

Newham Council response to IN2: Inspector's Further Preliminary Questions to the Council

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

Council Response:

Yes, the Plan was prepared in accordance with Newham local development scheme 2022 and its subsequent replacement versions (2024 and 2025). Together these documents set out the timetable of the main stages in the preparation of Newham Local Plan up to the likely timeframe for examination and adoption which are still to be confirmed.

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?

Council Response:

There were no representations made under Regulation 20 that directly raised concerns about the consultation carried out during the preparation of the Local Plan failing to comply with the Statement of Community Involvement (SCI).

However, several residents did express concerns about a lack of engagement with local stakeholders, including community groups, community leaders, residents and landowners for Abbey Mills (petition style responses) They concluded that the Plan failed to comply with the Duty to Cooperate.

For Regulation 19 consultation Newham Council carried out community events and drop-in sessions. In the community events we discussed key issues and the requirements of the Regulation 19 consultation with community groups. The drop-in sessions invited residents to view and comment on the Draft Submission Local Plan and its evidence base, as well as supporting materials such as the Main Changes Summaries, all this is set out and evidenced in the Regulation 22 Statement.

The Council consider that we have complied with all the requirements in the Statement of Community Involvement, following on from the consultation we have agreed with Abbey Mills developers that they complete a community engagement strategy for further engagement with the community regarding any master-planning of their site. Please also see our response in PQ4.

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?

Council Response:

The Council is of the view that it has taken all reasonable steps to meet its Public Sector Equality Duty through the preparation of the Local Plan.

An assessment of how the consultation process has facilitated opportunities for engagement for a range of people is included in Newham Local Plan Refresh Regulation 22 Consultation Statement (SD017 – Appendix 1, section 3.5, and Appendix 2 section 3.9). We note a resident has positively commented at Regulation 19/20 that the Council's approach to the consultation demonstrated a desire to reach out to Newham's diverse communities.

Following comments received at Regulation 18 (SD047) about the comprehensiveness of the Equalities Impact Assessment (EQIA) prepared at that stage, Planning Policy Officers worked with the Council's Inclusion Officers to adapt the corporate Equalities Impact Assessment (EQIA) process in a meaningful and appropriate way for the Local Plan. A range of data sources have been used that provide data on the specific needs and challenges of specific sections of the population that share protected characteristics, including from Newham's Population Surveys, the Census 2021, as well as relevant consultation responses received at Regulation 18. The information has informed the EQIA (Appendix J to the Integrated Impact Assessment, SD007) which in turn has informed the Integrated Impact Assessment (IIA) (SD006, sections 4.6 and 5.11).

The Council believe our approach to the IIA and EQIA assessments is proportionate and effective for plan-making purposes and demonstrates that the Council has had due regard to the Public Sector Equality Duty. No instances have been identified where the content of policies, applied as a whole, would give rise to adverse effects on people who share protected characteristics and no groups are disproportionately affected by the policies in the Local Plan. Overall, the IIA and EQIA broadly show likely positive impacts on a range of groups of people sharing protected characteristics.

Nevertheless, there have been representations made under Regulation 19/20 by several residents that made claims relevant to the Local Plan's impact on 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. These are summarised in the table below, together with relevant sections of the IIA and EQIA.

Issue raised	IIA and EQIA conclusions
<p>A number of residents raised concerns that the lack of specific support for a large scale mosque on the Abbey Mills site allocation may lead to adverse impacts on the muslim community, and that policies SI1, SI2 and SI3 do not help meet the muslim communities' needs for faith-based facilities, including for Islamic education, that reflect the specific accessibility and inclusion needs of women, children, elderly and those with disabilities.</p>	<p>IIA (SD006) paragraph 5.11.5 provides a summary of how the Plan has been identified to benefit protected characteristic groups, including on the basis of age (older people, children and young people), those with a disability, and those practicing religion, particularly those practicing Islam.</p> <p>EQIA assessment of the Social Infrastructure chapter concluded that the policies all work to increase the quality and range of social infrastructure within Newham, which would support health and wellbeing across all protected characteristic groups and also improve the amenity and design of such facilities within Newham. Positive effects are anticipated upon children and young people (SI4, SI3), the elderly (SI1, SI2), disabled people (SI1, SI2, SI4), socio-economically deprived communities (SI2, SI1, SI4), women (SI3), those from Black, Asian, and Other White ethnicities (SI3), and those who belong to religious groups (SI1, SI2, SI5). The combination of social infrastructure policies are all likely to improve the physical health and mental wellbeing of those in Newham.</p>
<p>A resident argued that policy GWS5 does not promote significant improvements in play space, especially for over 8-year-olds. She further stated that there is no recreational and sports activities for young people and teenagers, despite a significant proportion of the population being under the age of 25.</p>	<p>The IIA paragraph 5.11.5 noted positive effects are anticipated for younger people, through improved quantity and quality of open and play space provisions across developments, providing spaces for play and socialisation.</p> <p>EQIA assessment of the Green and Water Spaces chapter concluded that the policies are likely to have a positive impact upon a range of protected characteristic groups, including young people benefiting from the provisions of policy GWS5.</p>

	<p>The EQIA assessment of the Design chapter concluded that Policy D2, which includes promoting active travel and play space in the public realm, will contribute to improving physical activity with likely positive effects for children.</p> <p>The EQIA assessment of the Social Infrastructure chapter concluded that Policy SI3, promoting the development of sports and recreation facilities, is particularly likely to benefit young people, those who are socio-economically deprived, and children.</p>
<p>A resident argued as part of response to policy T2 that the Local plan should have a commitment to the inter-connection of services, such that the chain of responsibility for transport accessibility is not broken by the different responsible service providers, as required by the Disability Discrimination Act 1995, and giving an example of an inaccessible bus stop outside 206 High Street North, in East Ham.</p>	<p>The IIA paragraph 5.11.5 noted that particularly people with a variety of disabilities will benefit from a more accessible environment. The Local Plan includes policies which support inclusive design which will help to improve connectivity and function, benefiting users with mobility limitations.</p> <p>EQIA assessment of the Transport chapter concluded that policies T1 and T2, which promote a network of well-connected neighbourhoods, are likely to result in positive effects upon elderly, young, and disabled people who rely on local proximity to services and facilities.</p>
<p>A resident has argued that the housing strategy set out in the Local Plan is not ambitious enough to address the significant need for social housing in the borough, which will adversely impact on people who are socio-economically disadvantaged. He further queried whether the broad scope of the EQIA supporting the Local Plan is sufficient to ensure future planning applications approved would be appropriately scrutinised for their individual potential equality impacts.</p>	<p>We note that Socio-economic inequality is not a protected characteristic recognised by the Equalities Act 2010, but it is one that the Council itself has adopted as part of its Duty.</p> <p>Both the IIA (paragraph 5.11.5) and the EQIA assessment of Homes chapter concluded that those experiencing socio-economic deprivation are most likely to experience positive effects as a result of policies H1 and H3 due to improvements in the quantity and quality of housing within Newham and the provision of affordable housing.</p> <p>Equalities considerations are also part of the development management process.</p>

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?

Council Response:

There have not been any issues raised by statutory consultees and other duty to cooperate bodies about Newham’s engagement and ability to meet the duty to cooperate. Newham have been proactive in engaging with all consultees as part of the development of the new Local Plan, as set out in the Duty to Cooperate Statement (2024) and Addendum (2025).

We note a few residents have raised their perceived consultation issues as a failure of the duty to cooperate. However, public engagement does not fall under section 33A of the 2004 Act. Please see our response to PQ3 regarding our compliance with requirements for community engagement.

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?

Council Response:

(a) Newham has continuously engaged with the GLA as part of the preparation of the Local Plan. We are currently working with the GLA to try to resolve the housing delivery issues that the GLA have raised, as set out in further details in our responses to PQ7

(b) We expect to be able to finalise the statement of common ground with the GLA weekending 21st November 2025

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?

Council Response:

(a) Newham approached Thames Water to discuss progressing a statement of common ground in February 2025, after reviewing comments submitted by Thames Water at Regulation 19. The email exchange helped update Thames Water's position with regards to water and wastewater infrastructure requirements for specific site allocations, which resulted in proposed modifications submitted with the Plan for examination. Nevertheless, it was agreed that it would be more helpful for the statement of common ground process to be paused until the independent review of the odour reports for Beckton Sewage Works was completed and all parties had had an opportunity to review it. Comments from Thames Water on the first draft of the Cogan Odour Report informed an updated version, which has been shared with Thames Water recently as part of the re-commenced process of preparing the statement of common ground.

(b) We expect this process to be completed weekending 14th November 2025.

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

(i) any relevant 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.

Council Response:

(a) We disagree with the Mayor's opinion that the plan is not in general conformity with the London Plan, a local plan can be found not to be in conformity with the London Plan, as demonstrated by cases where the Mayor of London has raised concerns or objections to draft local plans, such as the Wandsworth or Waltham Forest local plans in the past. Planning authority can make modifications to align their plan with the London Plan's strategic policies before it can be adopted.

(b) Policy H1.A of the London Plan sets out the ten-year targets for net housing completions that each local planning authority should plan for. Part B of the policy sets out expectations of steps boroughs should take to achieve the ten-year targets. We consider we have met these policy expectations and have set out a positive approach to resolving our housing capacity shortfall; however, we maintain that is fundamental that our housing target is justified and effective as per the requirements of the NPPF. It is our view that the need to not revisit these figures through the plan making process (as recommended in London Plan paragraph 0.0.21) overlooks the clear delivery challenges that London has faced since the publication of the 2017 SHLAA, namely as a result of poor economic conditions. These challenges are acknowledged by the GLA in the published [London Housing Delivery Taskforce - Joint Position Statement](#).

As per paragraph 4.1.10 of the London Plan, we have sought to work closely with the GLA to advise them of our delivery challenges throughout the preparation of the Local Plan. The draft Statement of Common Ground we are working with the GLA to produce highlights the various ways in which Newham has sought to optimise housing delivery in recent years. These have been acknowledged by the GLA and include:

- Continued engagement with the GLA, TfL and Homes England to facilitate the delivery of Beckton Riverside, the borough's largest site allocation. This includes addressing the complex infrastructure requirements for the site, helping to ensure the coordination required to optimise and deliver the site as quickly as possible.
- Working with the London Legacy Development Corporation (LLDC), Network Rail and Transport for London (TfL) to develop the Strategic Outline Business Case (SOBC) for the long-term redevelopment of Stratford station and the surrounding area to address capacity and connectivity issues. Early agreement on funding improvements will help unlock and accelerate development in the wider area.
- Offering dedicated planning officers, as part of the Planning Performance Agreement offer, on strategic sites.
- Funding a dedicated transition project officer and two planning officers to support the transition of planning powers from the London Legacy Development Corporation (LLDC), ensuring timely support for the delivery of sites, through the discharge of conditions and delivery of obligations as well as sufficient resource to manage the large remaining workload of new sites and applications transferring from the LLDC.

Alongside the housing delivery being enabled by the planning service, the Council is actively engaged in delivering three significant estate regeneration schemes: at Carpenters, Canning Town, and Custom House, including undertaking CPOs where required. This is alongside a pipeline of new housing sites and smaller infill schemes.

We also think it is important to stress that delays to delivery do not mean that our housing capacity has reduced. Indeed, once we are able to meet the London Plan housing target (which we currently anticipate being met in 2033/34), we are able to deliver additional capacity above this figure of at least 17,240 units over the course of the plan period.

In reference to the affordable housing policy H3, 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 (6,980 as of March 2025). 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.

We also note that Policy H5 of the London Plan includes a provision at part C3, where those applications that are designed to meet the Fast Track Route must "meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant". Therefore, our view is that there is flexibility in the policy wording to allow for boroughs to set additional policy requirements beyond the standardised London approach to requiring viability assessments.

Examples of London boroughs that had a Local Plan found sound by the Planning Inspectorate despite not initially being in general conformity with the London Plan are Waltham Forest and Richmond. London Borough of Waltham Forest agreed a statement of common ground with the GLA in March 2022, which outlined the necessary modifications to the Waltham Forest Local Plan Part 1 to bring it into general conformity with the London Plan.

In the case of Richmond, the Statement of Common Ground did not put forward modifications to resolve the non-conformity issues raised by the GLA, including on affordable housing policy, which then were subject to further discussion at the examination Hearings. Modifications then followed as set out in London Borough of Richmond's 'Position Statement on Updates to Policy 11 Affordable Housing' (November 2024). The respective Inspectors reviewed the modifications and finding them sufficient concluded that, with these changes, the Plans were in general conformity with the London Plan, sound and legally compliant.

As set out in PQ5, we are actively working with the GLA, as part of the Statement of Common Ground, on resolving issues as much as possible ahead of the examination Hearings.

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?

Council Response:

The Council specified in para i.4 that the submission version will be our new Local Plan for Newham. A modification was proposed (MO2.1) to give further clarification stating that the emerging Local Plan will replace the Newham Local Plan 2018, the Newham Gypsy and Traveller Development Plan Document 2017 and the London Legacy Development Corporation Local Plan 2020. The Council consider that the existing wording in para i.4 and the proposed modification (MO2.1) set out in sd004- Schedule of proposed modifications, will ensure that the plan is compliant with regulation 8(5).

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?

Council Response:

The policies designed to secure mitigation of, and adaptation to, climate change are:

- GWS1: Green spaces
- GWS2: Water spaces
- GWS3: Biodiversity, urban greening, and access to nature
- GWS4: Trees and hedgerows
- CE1: Environmental design and delivery
- CE2: Zero Carbon development
- CE3: Embodied Carbon and the circular economy
- CE4: Overheating
- CE5: Retrofit and the circular economy
- CE6: Air quality
- CE7: Managing flood risk
- CE8: Sustainable drainage
- T1: Strategic transport
- T2: Local transport
- T3: Transport behaviour change.
- W1: Waste management capacity
- W2: New or improved waste sites
- W3: Waste management in developments

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?

Council Response:

The part of the Plan that identifies the Council's strategic priorities for the development and use of land in the Borough as required by section 19(1B) are set out in the overarching Vision and Objectives for the borough, which outline how the land in the borough should be used and developed to achieve the council's aspirations over the plan's period. The vision and objectives then informed the Strategic Policies, including the Neighbourhoods Policies and Site Allocations, which are together summarised in policy BFN1: Spatial Strategy. As stated above, the Council's strategic priorities are identified in the:

- Strategic Policies which address the main priorities for the borough. All policies in the Plan (stated in page 14) are considered strategic policies, with the exception of the following which are considered non-strategic policies:
 - BFN3: Social Value and Health Impact Assessment- delivering social value, health and wellbeing
 - D5: Shopfronts and advertising
 - HS6: Health and wellbeing on the high street
 - T4: Servicing a development
- Detailed Policies that provide more spatial context and direction for specific land use decisions, thereby ensuring strategic priorities are met effectively, are set out in our Neighbourhood policies and Site Allocations.

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

Council Response:

Yes, the Council considers that the Plan is succinct, focussed, concise and accessible. The structure of the Plan clearly distinguishes strategic policies from non-strategic policies and uses clear use of headings and formatting to organise information effectively.

The Plan is succinct and focused; it sets out a clear and locally specific vision for Newham's future that is both aspirational and realistic. The Plan's vision is a positive and justified response to the Newham context and the issues identified at the beginning of the Plan (All About Newham). The Plan provides a realistic understanding of the borough's current situation and future needs; this then forms the basis for the Plan's vision and strategic measurable objectives, which are consistently addressed throughout the Plan and its policies. The Plan's vision and objectives establish the framework upon which the Plan's policies and proposals are built, with an integrated sustainability appraisal (IIA) throughout, supported by a relevant and robust evidence base to justify the chosen policies, ensuring it is deliverable, viable and supported by the necessary infrastructure.

The Plan's justification text is intended to provide transparency, allowing the public, developers and Planning Inspectors to understand the reasoning behind decisions, and ensure that policies are robust and deliverable.

The structure of the Plan includes an 'Implementation' section for each policy. This is intended to give a clear explanation of how the policies should be applied. This implementation text ensures the Plan is as accessible as possible, especially for smaller developers, residents and other users that are less familiar with the planning system.

Overall the Plan is concise and seeks to avoid repetition and has been presented using plain English wherever possible and visual aids like maps, infographics, and images to improve understanding. It follows a logical structure, using themes and subheadings, and cross-references effectively. The Council also utilised digital format for our Policies Map to enhance accessibility for developers and communities.

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”?

Council Response:

(a) Yes, the tables, including detailed information and principles within some of the policy boxes, are intended to be “policies” for the purposes of section 17 of the 2004 Act. These tables include the policy-specific details that the London Plan requires boroughs to include in their development plans. The Council consider that all detailed information and principles within the policy boxes are an intrinsic part of the policy itself and can be interpreted as policy under the Act.

(b) No, the statements under the heading “Planning Obligations” are not intended to be “policies” for the purposes of section 17 of the 2004 Act. They are meant to give transparent guidance and advice on how planning obligations might be applied.

(c) No, the statements under the heading “Implementation” are not intended to be “policies” for the purposes of section 17 of the 2004 Act. They are intended to give guidance and advice on how the policies can be implemented, to avoid ambiguity and support applicants, development management officers and other readers.

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

Council Response:

The Council approach for including statements in the implementation box was to address a corporate priority (objective 7) of *People powered Newham and widening participation in the life of the borough and the work that the Council does*. In this way, we believe we have made a Plan that is as accessible as possible to smaller developers, residents and other users that are less familiar with the planning system, by ensuring that we not only include policies but also statements on how they should be implemented. We have aimed to keep the sections as succinct as possible, including by referring to the NPPF or the London Plan approach where relevant.

Consultation feedback received on Regulation 18 of the Plan from consultees such as LLDC, developers, residents and statutory bodies welcomed the clarity that the implementation sections provided and recommended/requested additional wording to explain how some of the policies can be implemented. Therefore, the Regulation 19 structure is justified by how effectively it responds to the feedback from consultations as well as the key corporate objective of widening participation.

While regulations do not mandate that a local plan include implementation guidance, the legal framework, particularly Section 19 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012, requires local plans to be “sound” and compliant with the National Planning Policy Framework (NPPF). The NPPF’s principles, and the broader need for plans to be effective and positively shape communities, create a strong practical imperative for including implementation guidance to ensure policies are clear, understandable, and effectively deliverable in practice from the time of adoption. This approach is also effective in streamlining the planning process for applicants’, by providing up-front information about the Council’s approach and expectations.

The approach to provide associated guidance on how the policy should be implemented follows a similar format to the London Plan (2021), which also provides implementation information, not just justifications for the policies. The adopted Newham Local Plan (2018) has included the same approach and has worked effectively, without needing to be supplemented by further SPDs. Other London borough’s recent Local

Plans that include implementation guidance include the emerging City of London City Plan 2040 (under examination), the Old Oak and Park Royal Local Plan (2022) and Islington Local Plan (2023), amongst others. While many of these plans do not clearly separate implementation guidance from justification paragraphs, we have chosen to be clear in this regard.

Further, we note the Government has published its response to the proposed plan-making reforms: consultation on implementation, in February 2025, in which they set out they intend to proceed with removing the existing Supplementary Planning Documents framework in favour of Supplementary Plans that have the same statutory weight as Local Plans. The approach taken as part of the Newham Local Plan therefore aligns with the national direction of travel, and provides a single, accessible, easy to understand Local Plan.

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?

Council Response:

For the Neighbourhoods section (Part 2) policies for the purposes of Section 17 of the 2004 Act are in the policy box for:

- N1 North Woolwich
- N2 Royal Victoria
- N3 Royal Albert North
- N4 Canning Town
- N5 Custom House
- N6 Manor Road
- N7 Three Mills
- N8 Stratford and Maryland
- N9 West Ham
- N10 Plaistow
- N11 Beckton
- N12 East Ham South
- N13 East Ham
- N14 Green Street
- N15 Forest Gate
- N16 Manor Park and Little Ilford
- N17 Gallions Reach

These policy boxes (for the purposes of Section 17 of the 2004 Act) contain for e.g. “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). The neighbourhood policies provide the design and development principles which will inform and guide development in each neighbourhood in order to achieve its vision over the plan period. For the purposes of Part 2, all applications will be assessed against the relevant neighbourhood policy and, where applicable, the site allocations in that neighbourhood.

The site allocations contains a box for each site with a heading, for e.g. N1.SA1 North Woolwich Gateway, with factual information (address, site area, heritage designations, existing uses, etc) and a box setting out development principles, design principles, infrastructure requirements and information about phasing and implementation, these are all considered policies for the purposes of Section 17 of the 2004 Act.

The site allocation maps which show the red line boundary and other information relating to design, layout, landscaping and access are not considered policy. These are indicative diagrams to show a visual representation of the design and development principles outlined in the site allocation policy.

The other information in Part 2 of the Plan is supporting information and are not intended to be policies these includes:

- Map of the neighbourhoods.
- Justification, implementation and evidence base section
- The neighbourhood profiles
- The Visions

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?

Council Response:

The intended purpose of the maps of the site allocations is to show the red line boundary and provide a visual representation of the design and development principles outlined in the site allocation policy. We acknowledge that these site parameters can come forward following different iterations and that the optimal layout and masterplan for the site will be discussed and agreed at the design stage through master-planning and the planning application process. Please also see our response in PQ14

The policies map displays land use designations and shows the locations of the site allocations illustrated by a red line boundary, while the site allocation diagrams illustrate the design principles for each site and how they could potentially be delivered.

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?

Council Response:

Yes, all policies identified as strategic in the box on page 14 of the Plan meet one or more of the relevant NPPF/PPG criteria to be identified as such, as explained further below.

Policies that set out an **overarching direction or objective:**

- BFN1 sets out the overarching spatial strategy.
- HS1 set out the approach to protecting, adapting and growing the vitality and viability of Newham’s town centres and neighbourhood parade designations.
- J1 sets out how employment floorspace will be protected and promoted.
- H1 sets out how the Plan will meet housing need over the plan period.
- GWS1, GWS2 set out how green spaces and water spaces will be protected, enhanced and managed.
- CE1 sets out climate emergency adaption and mitigation objectives.
- T1 sets out how strategic transport infrastructure will be protected, enhanced and/or delivered.

Policies that seek to **shape the broad characteristics of development:**

- BFN2 sets our masterplanning and co-design criteria in order to make best use of available land and help meet Plan objectives.
- D1, D2, D3 and D4 policies cumulatively set out principles, standards and other criteria for assessing the broad characteristics of quality of design.
- D7, D8 and D9 policies shape development that affect heritage assets and conservation areas, including their settings
- HS2, HS4 and HS5 policies sets out how market trends for main town centre uses will be managed
- J2 sets out principles, standards and other criteria for developments providing employment floorspace

- GWS4, GWS5 provide principles and standards for the inclusion/management of trees and hedgerows and play and informal recreation in developments
- CE1 provides the framework for environmental design
- CE5 provides the framework for supporting retrofit and the circular economy
- T2 and T3 provide principles and standards to support active travel and sustainable public transport.
- W1, W3 and W4 provide principles, standards and other criteria for ensuring that waste, utilities and digital connectivity infrastructure are appropriately integrated into developments

Policies that **set a framework for decisions on how competing priorities** should be balanced:

- BFN4 sets out how planning obligations and infrastructure will be prioritised
- D6 sets out how agent of change principles will be applied in the context of Newham's vision for growth set out in the Plan.
- D9 sets out how designated and non-designated heritage assets will be protected from harm and provides guidance on how exceptional circumstances justified by substantial public benefit will be considered.
- HS1 sets out how the growth of the network of town centres will be managed to balance the overall function of the network.
- HS3 sets out how the sequential test and impact test will apply in Newham, including exceptions to the sequential test.
- HS5 and HS7 sets out how growth of the evening and night time visitor economy and the delivery-led business sector will be balanced against amenity and transport impacts.
- HS8, set out how the need for housing will be balanced against the demand for visitor accommodation.
- SI1, SI2, SI3 set out how demand for social infrastructure within neighbourhoods will be balanced against the town centre first principle.
- J3 seeks to protect against the net loss of employment capacity.
- H2, H5, H6, H7, H8, H9, H10 set out how different types of housing needs will be met, including through protecting existing housing.
- CE4, CE6, CE7 and CE8 set out how the need for development is balanced against need to manage overheating risk, air quality and flood risk.
- T5 sets out how the impacts of London City Airport will be managed.
- W2 sets out principles and criteria for how new and improved waste sites will be supported to balance environmental and economic needs with amenity and transport impacts.

Policies that set a **standard or other requirement** that is essential to achieving the wider vision and aspirations in the local plan or spatial development strategy:

- BFN2 sets our essential masterplanning and co-design criteria in order to make best use of available land and help meet Plan objectives.
- D4 sets out standards and requirements for tall buildings
- D6 sets out how good amenity standards will be achieved and maintained.
- SI1, SI2, SI3, SI4 and SI5 set out how social infrastructure will be delivered to meet locally-specific needs.
- J4 sets out how development will contribute towards delivering Community Wealth Building and inclusive growth
- H3, H4 set out targets/thresholds for affordable housing and housing mix.
- H11 sets housing design standards across different typologies.
- GWS3 sets out biodiversity net gain and urban greening factor targets
- CE2, CE3 set out carbon reduction requirements
- T3 sets Transport Assessment and Travel Plan requirements

The delivery of the neighbourhood policies and site allocations identified in Part 2 of the plan are central to achieving the vision and aspirations of the Local Plan and spatial development strategy, as they provide the

key mechanism to delivering on the needs identified in the evidence base supporting the Local Plan, including housing and a range of infrastructure types.

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

Council Response:

No representations made under regulation 20 claim that the Integrated Impact Assessment failed to identify reasonable alternatives to the Plan.

A summary of responses to the Integrated Impact Assessment at all consultation stages can be found in Appendix B of the Integrated Impact Assessment Appendices (SD007 pages 10 to 37).

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 of London 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?

Council Response:

The Integrated Impact Assessment paragraphs 4.35 to 4.3.10 (SD006 pages 71 to 73) details this.

"Typically, for a Local Plan, reasonable alternatives will include options regarding the amount of growth, the spatial strategy, individual site allocations as well as the policies to manage and plan positively for growth.

The potential to consider reasonable alternatives is, however, limited by the London Plan with which the Local Plan must be in conformity [...] In consequence, as the London Plan 2021 includes an annual housing target for the borough the SA has not considered reasonable alternatives for the scale, broad locations and planning policy associated with housing provision."

This approach is corroborated by the Inspectors Report on the Local Plan for the London Borough of Hounslow (31st July 2015), which is detailed at 4.3.8 and 4.3.9 (SD006 pages 71 to 73).

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?

Council Response:

The Council consider that the Local Plan could be adopted with a shorter than 15-year period reflecting the likely need to undertake a further refresh at the 5-year review point to address the new plan making requirements and updates to the London Plan. However, if this is not possible the Council consider that, although some evidence base projections are to 2038, a quick update to 2042 of these documents will not result in any significant changes that will affect the soundness of the plan.

For Policy J1, the target for office and industrial floorspace can be pushed forward further by assuming the Plan base date will remain 2021. For office floorspace, which is based on an economic forecast, we can extend the end date to 2041 which happens to be the end date in the Experian base data forecast (Dec 2021), and then we can forecast the trend forward to 2042. For industrial, which is based on a past trend in job delivery 2009-2019, we can move this on the three years until 2042. This approach is based on advice provided by our Employment Land Review consultant.

For Policy H1, 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 including the extended plan period to 2042) therefore these sites are already identified and are not new. There will also be a rolling forward of the housing capacity assumptions applied in the London Plan for small sites.

The information covering extended plan period to 2042 can be sent to the Inspector along with the signed GLA SoCG by weekending 21st November 2025. The Council requests that the Inspector recommends any modifications to the plan to cover the extended plan period.

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?

Council Response:

(a) We would support a minor modification to Policy H1's justification text to clarify that housing delivery will be measured against the lower range target, as follows:

[Paragraph 3.174] Supply will be measured through a stepped trajectory, based on the lower range housing target of 51,425, with a different target for every five year phase of the Plan, as follows:

(b) The range target reflects the approach we have taken to optimising capacity through design-led capacity testing on site allocations. On four site allocations we are aware that revised schemes for sites with planning permission are likely to come forward. In these instances, we have used both approved permission figures and design-led capacity testing to inform the housing trajectory (with the higher figure informing the higher range target, and the smaller figure informing the lower range target).

We also have two sites that include options for higher capacity that have been identified for potential infrastructure improvements (Royal Albert North and Stratford Station). As there currently isn't secured funding for these improvements, we have included lower capacity options if these infrastructure aspirations are not delivered.

One site contains a lower capacity option for a smaller boundary, if the site is unable to be comprehensively masterplanned (Canning Town Holiday Inn). Finally, East Beckton Town Centre includes an option to deliver additional sports and recreation leisure floorspace, which would result in a lower capacity residential option for the site. This additional leisure is required should the preferred leisure site for the Beckton catchment area not come forward, as evidenced through the Built Leisure Needs Assessment.

The purpose of the higher range trajectory is to set out our aspirations for optimising site allocations across the borough and positively plan for these outcomes through the site allocation requirements. However, the purpose of the lower range trajectory seeks to ensure the plan's housing target is justified and can be effectively delivered, recognising that some sites are not progressed to a significant stage (e.g. secured new planning permissions or the secured funding of infrastructure) to fully rely on higher capacity housing assumptions.

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)?

Council Response:

Yes, we agree these figures are correct.

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)?

Council Response:

Yes, this is correct.

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?

Council Response:

We project the following delivery on each of these categories:

- a. Allocations: 38,094
- b. Small sites: 5,700
- c. Windfalls (2017 GLA SHLAA sites and lapsed permissions): 3,270
- d. Any other sources:
 - a. Approvals and resolution to grants on sites outside of site allocations: 6,720

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)?

Council Response:

(a) Yes, the Plan allocates every site that the Council considers to be suitable and available for development.

(b) All site allocations considered suitable for developments and that have been included in the Plan have been capacity tested as part of the development of the Characterisation Study in order to consistently inform design policies as well as the design principles for site allocations, and to provide a housing capacity figure to inform the housing trajectory. The only two allocations that were not capacity tested were the Carpenters Estate and Stratford Waterfront South, due to the former's extensive co-designed masterplan, and the latter's delivery of a higher education campus and student housing.

The methodology used for the capacity testing is explained in detail in Chapter 3 in the [Site Allocation and Housing Trajectory Methodology \(2025\)](#). The methodology approach used for the capacity testing is in line with the London Plan 2021 policies - including Policy D3 Optimising site capacity through the design-led approach - and follows the methodology that is set out in the London Plan Guidance Optimising site capacity: A design-led approach.

The capacity modelling and the figures arising from that work (now shown in the Topic Paper on Site Capacity Study) have not been published during consultation on a site-by-site basis because it represents one way of optimising the capacity of a site. The Council consider that the exact scale of housing

development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the Local Plan.

The site allocations within the Neighbourhood section of the Plan took into account constraints and other policies, including relating to industrial land, environmental assets etc. They also contain development principles, design principles, and infrastructure requirements aimed at achieving the optimisation of the sites. The design principles of each site allocation are drawn from the neighbourhood vision set out in the Newham Characterisation Study (2024) and from the design principles finalised in the design-led capacity testing. The design requirements include the principles for movement routes through the site, the road hierarchy, the scale of development and how this should relate to any sensitive context, and how it should deliver green infrastructure. While the Council recognises that the development of each site could be delivered through different site layouts and building typologies, the design principles and the infrastructure requirements ensure that every proposal will reflect the Council's wider vision and objectives. The optimisation of the sites is also supported by Local Plan policies D3 (Design-led site capacity optimisation) and BFN2 (Co-designed masterplanning), which require the optimisation of sites in relation to the strengths and opportunities of the site and its neighbourhood as delivered through effective, collaborative masterplanning.

(c) We have attached the trajectory that includes the information that informed the Regulation 19 housing target (see attached 'Housing Trajectory FY2022.23 REGULATION 19 PINS'). You can search for the capacity associated with each site allocation by searching the site allocation reference (e.g. N1.SA1) in the 'Reference' column of the spreadsheet (column A). In some instances, capacity is informed by both design-led capacity testing and planning permissions. The tab 'Range trajectory' shows the lower range capacity estimates for a small number of sites; these informed the lower range trajectory target.

A summary of the capacity of each site, using the data in the housing trajectory, is provided below. This table includes the capacity for the submitted plan (see attached 'Housing Trajectory FY2022.23 REGULATION 19 PINS'), and the capacity reflecting the data in document EB058 (the Site Allocation and Housing Trajectory Methodology Note).

Site Allocation	Indicative capacity (net additional homes) based on higher range trajectory	
	Submitted Plan	EB058
N1.SA1 North Woolwich Gateway	350	350
N1.SA2 Rymill Street	143	143
N2.SA1 Silvertown Quays	2,931	2,800
N2.SA2 Lyle Park West	810	810
N2.SA3 Connaught Riverside	1,384	1,384
N2.SA4 Thameside West	2,400	2,200
N2.SA5 Excel Western Entrance	136	136
N3.SA1 Royal Albert North	1,919	1,830
N4.SA1 Canning Town East	1,388	1,230
N4.SA2 Silvertown Way East	168	168
N4.SA3 Canning Town Holiday Inn	216	223

N4.SA4 Limmo	697	655
N4.SA5 Canning Town Riverside	871	871
N5.SA1 Custom House Land surrounding Freemasons Road	593	593
N5.SA2 Custom House Coolfin North	381	381
N5.SA3 Custom House Land between Russel Road and Maplin Road	77	77
N5.SA4 Royal Road	116	116
N7.SA1 Abbey Mills	596	596
N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks	4,882	5,142
N7.SA3 Sugar House Island	853	831
N8.SA1 Stratford Central	1,195	703
N8.SA2 Stratford Station	1,311	1,311
N8.SA3 Greater Carpenters District	1,311	1,445
N8.SA4 Stratford High Street Bingo Hall	153	153
N8.SA5 Stratford Town Centre West	2,776	4,580
N8.SA6 Stratford Waterfront South	500	500
N8.SA7 Rick Roberts Way	389	391
N8.SA8 Bridgewater Road	677	677
N8.SA9 Pudding Mill	2,108	2,315
N8.SA10 Chobham Farm North	208	208
N9.SA1 Plaistow North	319	319
N10.SA1 Balaam Leisure Centre	44	44
N10.SA2 Newham Sixth Form College	201	201
N10.SA3 Newham Leisure Centre	141	141
N10.SA4 Balaam Street Health Complex	51	51
N11.SA1 East Beckton Town Centre	1,160	984
N11.SA2 Cyprus	215	215

N11.SA3 Alpine Way	707	636
N13.SA1 East Ham Western Gateway	138	63
N13.SA2 East Ham Primark	85	85
N13.SA3 Former East Ham Gasworks	246	221
N14.SA1 Shrewsbury Road Health Complex	43	43
N15.SA1 Lord Lister Health Centre	37	37
N15.SA2 Woodgrange Road West	157	157
N17.SA1 Beckton Riverside	3,011	2,610
Total	38,094	38,626

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?

Council Response:

We project the following delivery on each of these categories:

- a. Allocations: 38,626
- b. Small sites: 5,746
- c. Windfalls (2017 GLA SHLAA sites and lapsed permissions): 3,331
- d. Any other sources:
 - a. Approvals, resolution to grants and completions on sites outside of site allocations: 7,273

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

Council Response:

We have attached the trajectory that includes the information that informed the Submission plan housing target ('Housing Trajectory FY2023.24 SUBMISSION PINS'). You can search for the capacity associated with each site allocation by searching the site allocation reference (e.g. N1.SA1) in the 'Reference' column of the spreadsheet (column A). Attached, is the Topic paper on Site Capacity Study of the allocated site. In some instances, capacity is informed by both design-led capacity testing and planning permissions. The tab 'Range trajectory' shows the lower range capacity estimates for a small number of sites; these informed the lower range trajectory target.

A summary of the capacity of each site, using the data in the housing trajectory ('Housing Trajectory FY2023.24 SUBMISSION PINS'), is provided above in response to PQ24. Please see the column labelled EB058 in the table.

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?

Council Response:

(a) We anticipate finalising our land supply information in the housing trajectory, following the close of the 2024/25 Starts and Completions exercise by weekending 21st November 2025, when we anticipate agreeing the SOCG with the GLA. See response to PQ31(b) for further information on this process.

(b) This updated trajectory will report completions to 31 March 2025.

(c) It will contain comprehensive information on planning permissions till 1 April 2025.

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?

Council Response: We agree this period is appropriate for the five-year land supply.

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?

Council Response: Yes, we agree those figures are correct.

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?

Council Response:

We have attached the trajectory that includes information that informed the Submission housing target ('Housing Trajectory FY2022.23 REGULATION 19 PINS'). This includes the sites and capacity expectations that have informed capacity assumptions between financial year 27/28 and 31/32. Of the total units identified across these 5 years (18,642), 9,976 benefit from planning permission or a resolution to grant planning permission. The remaining capacity is from small sites (using the GLA assumption of 380 units on small sites per year), and from site allocations that have received landowner engagement (either via Call for Sites proformas or subsequent developer engagement) suggesting they will be delivered in the medium term of the plan period (2028/29 – 2032/33). There are a small number of sites without positive landowner engagement that have been phased in the medium term, namely where there are a small number of units being delivered on the site and there are no complex infrastructure delivery requirements.

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?

Council Response:

(a) We have attached the trajectory that includes information that informed the Submission housing target ('Housing Trajectory FY2023.24 SUBMISSION PINS'). This includes the sites and capacity expectations that have informed capacity assumptions between financial year 27/28 and 31/32. Of the total units identified across these 5 years (20,981) 14,173 benefit from planning permission or a resolution to grant planning permission. The remaining capacity is from small sites (using the GLA assumption of 380 units on small sites per year), and from site allocations that have received landowner engagement (either via Call for Sites proformas or subsequent developer engagement) suggesting they will be delivered in the medium term of the plan period (2028/29 – 2032/33). There are a small number of sites without positive landowner engagement that have been phased in the medium term, namely where there are a small number of units being delivered on the site and there are no complex infrastructure delivery requirements.

(b) We are in the process of undertaking the starts and completions exercise for financial year 2024/25, so there should be an update to completions and site phasing by weekending 21st November 2025, when we anticipate agreeing the SOCG with the GLA.

We are currently also in the process of agreeing a Statement of Common Ground with the GLA. While we have sought through the preparation of the plan to demonstrate a deliverable housing requirement figure, we have discussed providing a second housing trajectory option to the GLA that assumes a more optimistic phasing approach, based on published information from developers about their delivery timescales (even if this means a high delivery rate of over 200 homes per annum on some sites). We would aim to meet the aforementioned 5-year supply target plus the 20% buffer figure of 21,982 homes.

The options we present to the GLA would mean delivering previous years' shortfall against the London Plan target over the course of Newham's emerging Local Plan period.

Our intention is to present these options to the GLA (using the Regulation 19 Submission Local Plan phasing and the more optimistic developer-specified phasing) to determine which is their preferred approach. Once we have reached agreement with the GLA as part of the SOCG we will present this to Inspector for your consideration.

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

Council Response:

(a) Yes. The Gypsy and Traveller Accommodation Assessment 2022 (GTAA) evidence base methodology covers Gypsy and Traveller need across the years 2022 to 2038.

As per paragraph 7.33, of the Newham GTAA, most of the need for Gypsy and Traveller accommodation stemmed directly from needs of the existing community in the borough, as ascertained through detailed surveys. The remaining 8 pitches needed were a result of new household formation assumptions, calculated using data on the demographics of the existing residents (discussed in paragraph 7.12 of the GTAA) including an assumption that that 50% of households likely to form will stay in the area, based on evidence from GTAA's the consultants have undertaken across the country. Need was phased accordingly across the study period (see paragraph 7.15 of the GTAA). Noting the study data on need was primarily

derived from detailed surveys with existing residents of pitches in the borough, the Council does not envisage that previously assumed demographic growth will have changed significantly since the site surveys took place in 2022.

(b) Yes. Although the study was undertaken while the 2015 Planning Policy for Traveller Sites (2015 PPTS) was still in use, the study sought to capture need for Gypsy and Traveller accommodation for communities whose needs fell outside of the 2015 PPTS definition of Gypsies and Travellers. Therefore, the study captures need which would now fall under 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?

Council Response: Latest information from the GLA says the emerging evidence base will be published in Autumn/Winter 2025.

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?

Council Response:

Newham's challenges with the allocation of pitches are set out in the Gypsy and Traveller Topic Paper (TP002) that accompanies the plan. In summary our key barrier to allocating new sites has been demonstrating that they are deliverable, given a lack of landowner interest in delivering pitches. Allocating sites without the certainty around deliverability would be a key soundness issue with the plan. Neighbouring boroughs have also not been able to help Newham in meeting its needs, as set out within Statements of Common Ground.

To clarify, the plan does identify one site, allocated in the policies map as a Gypsy and Traveller Site. This is an existing 15 pitch site in the borough but can deliver an extension through two new pitches to the south. It is officers' opinion that this could come forward in years 6-10 of the plan period, noting it forms part of the borough's small sites option appraisal (discussed in response to PQ35 below).

Although we have had challenges in identifying suitable sites through the plan, we are continuing to work with our colleagues in the Council's Asset's team to assess the suitability of Council-owned small sites for pitch delivery. This is discussed below in response to PQ35.

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

Council Response:

This is set out in sections 3.5 and 3.8 of the Gypsy and Traveller Topic Paper (TP002) that accompanies the plan.

In summary, since 2023 the Council has been conducting a comprehensive review of Council-owned assets, with the objective of making decisions on how best to use circa 300 sites to deliver Council objectives, such as for housing and community uses. A report on the programme was approved at Newham's cabinet in July 2023, and an options appraisal exercise subsequently took place. The options appraisal put forward future recommendations for each of these sites, with both first and second options and a lead individual/team identified to take each recommendation forward. This appraisal process included considering whether sites were suitable for Gypsy and Traveller pitches. Through this sifting exercise, two sites were identified as a priority for delivering Gypsy and Traveller pitches. These two sites were assessed

further from a planning perspective; as a result one of these sites was fully discounted for being located in Flood Zone 3, which is not considered to be suitable for permanent pitch provision as per national policy and guidance.

Other sites were also identified as potentially suitable for pitches, albeit these were lower priority options (e.g., they were identified as a priority for general needs housing or community assets). There is still potential to develop these sites for pitches, particularly where the viability of delivering their priority uses remains challenging. However, this will be subject to individual business cases for delivery, noting the unprecedented financial challenges the borough is facing as a result of the high number of people in the Council being housed in temporary accommodation.

The Council is currently progressing feasibility of several of its small sites over the 2025- 2027 period, which includes Gypsy & Traveller accommodation as an assessed category. Delivering new pitches to meet need is led by our Housing and Assets teams as part of the next stage of the Council owned small sites project delivery. A corporate remit was provided to officers in this team to progress this work in May 2025, a month following approval to submit the Local Plan by Full Council. Noting the relatively recent progress on this part of the project, the Planning team are now assisting with this workstream by undertaking an assessment of whether there are any planning constraints on these sites that may impact the delivery of new pitches.

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

Council Response:

No.

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

Council Response:

The Council clarifies that the leisure uses referred to in BFN1 Part 4 are those which fall under the definition of main town centre uses as set out in the NPPF (2023) glossary as related to leisure and entertainment (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, indoor bowling centres and bingo halls).

Policy BFN1 Part 4 excludes leisure centres (sports and recreation facilities). These uses are directed to specific locations through policy BFN1 Part 5. The floorspace requirements for sports and recreation facilities have been informed by the Built Leisure Needs Assessment (EB045) and in dialogue with Sport England. Where a need for sports or recreation has been identified on a site allocation, applicants should undertake a needs-based assessment at the time of delivery to ascertain the type of space required, as set out in Policy SI3.

The Community Facilities Needs Assessment (EB036) informed which of the site allocations should be providing community facility floorspace (including libraries, public halls or exhibition halls, pubs, music venues, dance hall, cinemas, theatres, galleries and museums). However, this study does not specify a floorspace requirement for these uses, rather it identifies where there is a deficit in access to community spaces. Where a need for a community facility has been identified on a site allocation, applicants should undertake a needs-based assessment at the time of delivery to ascertain the type of community floorspace required, as set out in Policy SI2/SI3.

The Retail and Leisure Study also does not provide a floorspace need for leisure uses, only for comparison and convenience retail. Chapter 13 of the Retail and Leisure Study (EB029) provides a qualitative assessment of the ability of the borough's town centres (district and above) to meet commercial leisure demands and makes recommendations about where certain types of leisure should be further encouraged

through policy, e.g. cinemas being encouraged in Beckton, Canning Town and the Royal Docks area. This is for two reasons.

Firstly, because the commercial leisure market is evolving, and flexibility is required to support the overall vitality and viability of town centres, in line with NPPF Para 90. We consider it would not be appropriate for the Local Plan to specify floorspace for uses such as cinemas, theatres, pubs etc., as operational models differ and being overly specific will not support the aims of the Local Plan to meet local needs, understood in terms of choice and access rather than floorspace.

Secondly, the introduction of Use Class E does not allow policy to control the mix and proportions of shops, cafes and restaurants within developments; with cafes and restaurants being the highest proportion of commercial leisure demand in Newham as identified by the Retail and Leisure Study. Well before Use Class E came into force, most major planning applications for main town centre uses have been approved with use class flexibility in mind, allowing delivered floorspace to come forward for flexible uses, for example the former A1/A2/A3/A4 and D2 use classes. It is therefore not possible to quantify specifically how much leisure floorspace will be delivered even as part of approved planning applications.

The Local Plan aims to respond to main town centre leisure uses needs, as well as retail needs, through a more flexible strategy which includes:

- Allocation of sites in the plan in existing town/local centres, expanding existing town/local centres, or creating new town/local centres, in line with NPPF Para 90 d). The methodology and resulting designations for directing the growth of the network is set out in the Town Centre Network Review Methodology Paper 2022 (EB033) and its 2024 update (EB034) and broadly reflect existing planning permissions as part of which local retail and leisure needs have been assessed in more detail.
- Policy HS1 provides masterplanning criteria, including requiring an impact assessment when creating new centres/parades to ensure the quantity and mix of floorspace responds to local needs and the overall network of centres remains well balanced.
- Policy HS2 provides the principles of how market trends will be managed, including through making use of tools such as requiring a marketing strategy as part of the planning process in order to identify commercial demand from a range of operator types (Policy HS2.7), which in turn will influence floorspace masterplanning for that planning application.
- Monitoring of the mix of uses in town and local centres through surveying every two years, and through future updates to the Retail and Leisure Study.

The Council believes this approach is positively prepared and justified, and there is no need for a quantitative approach to leisure delivery.

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?

Council Response:

The Retail and Leisure Study 2022 found very limited unmet need for retail floorspace as related to the existing occupied developments in 2021 (EB029, Tables 12.5 and 12.14), and some higher need resulting from future development under the GLA population growth scenario (EB029, Tables Table 12.7 and 12.16) primarily for Stratford and Beckton areas. Given national trends and the range of masterplanning activity already underway on site allocations in the existing Local Plan (2018) and the LLDC Local Plan (2020), the Study concluded that there is no need for the Local Plan to designate sites in edge of centre or out of centre locations to address the identified comparison retail needs (EB029, recommendation LBN1).

In respect of convenience retail, the study recommended that the Plan should set out preferred locations and sites to meet the needs arising, focusing on the network of town centres, planned new centres (including local centres and neighbourhood parades), Opportunity Areas and Strategic Site Allocations in

the first instance (EB029, recommendation LBN2). The approach taken in the Local Plan has been to direct new food stores to site allocations in areas less well served currently, and not always to the largest town centre servicing an area. The locations required to deliver a new small to medium food store (as defined in the Local Plan Glossary, SD002b) are:

- Site allocation N1.SA2 Rymill Street, as part of an extension to the existing North Woolwich Local Centre. No current planning permission.
- Site allocation N2.SA1 Silvertown Quays, as part of an extension to the recently delivered Silvertown Local Centre. Existing planning permission and revised masterplanning submitted for consideration.
- N2.SA3 Connaught Riverside, as part of a new local centre
- N15.SA2 Woodgrange Road West, within Forest Gate town centre. Planning application delivered in 2024.
- N17.SA1 Beckton Riverside, as part of a new town centre

The Neighbourhoods policies, together with policies HS1 and HS2, more broadly continue to support delivery of convenience retail floorspace across the network of town and local centres to meet local needs, including through the creation of new local centres/parades or through the management of floorspace in the existing designations. The approach is in line with the Retail and Leisure Study (EB029, recommendations LBN5 and LBN28).

As set out in our response to PQ37 above, the Local Plan takes a flexible approach to the delivery of leisure floorspace, as part of the wider mix of main town centre uses that have already been approved on sites or that are likely to come forward in the future. The Local Plan focuses on providing principles and processes by which the growth can be managed effectively at planning application stage.

The Council believes that the approach taken across the Plan for the delivery of retail and leisure, as summarised in policy BFN1 part 4, provides a positive approach to the growth, management and adaptation of every designation in the town centres network, which will overall deliver the retail needs and provide the leisure enhancement opportunities identified by the Retail and Leisure Study. This approach is in line with NPPF 90.

The Sites Capacity Testing Summary Report attached to this document illustrates how each site has been capacity tested prior to Regulation 18 and following Regulation 18 consultation. The capacity of each site allocation included in the document provides a uses schedule that indicates which uses have been modelled in each site and their cumulative floorspace (expressed in GEA). Main town centre uses, and primarily class E uses, have been modelled within town/local centre and neighbourhood parade boundaries and have been identified in the 3D model and in the schedule as 'commercial' uses.

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?

Council Response:

(a) Sites with "industrial potential in planning" are identified in the Employment Land Review 2022 (Table 5.16) (EB048). This includes two sites with permitted schemes for multi-storey industrial intensification, namely the Albert Island and the G-park site at Thameside West.

(b) In the Plan, Albert Island is designated as a Local Industrial Location (LIL) while the G-park site forms part of the designated Thameside West Strategic Industrial Location (SIL). These designations are set out in Tables 6 and 7 of the Plan and illustrated on the Policy Map. Both sites are required to deliver a net increase in industrial floorspace in line with Policy J2 part 1.

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

Council Response:

The Local Plan allocates a number of Strategic Sites that have scope for employment-led or mixed use development that involves the intensification and/or co-location of industrial uses but does not quantify land area or floorspace. In general, site allocations are required and assumed to deliver no net loss of existing industrial floorspace, through re-provision or relocation in line with Policy J3 part 4. In some cases, site allocations should deliver the same quantity of employment floorspace as the permitted scheme(s). This requirement is included in site allocations N2.SA4 Thameside West, N7.SA2 Twelvetrees Park and Former Bromley by Bow Gaswork, N7.SA3 Sugar House Island and N8.SA9 Pudding Mill.

Site allocations have undergone capacity testing as appropriate to explore potential employment floorspace capacity, including options for industrial stacking. However, as referred to in the property market assessment of the Employment Land Review (EB048), this can only realistically be done on a site-by-site basis in response to specific development opportunities, as are considered for G-Park at Thameside West and for Albert Island. To ensure the supply forecast in the Plan is realistic, the potential capacity at site allocations without planning permissions are not included in the pipeline supply calculation.

Industrial floorspace supply is assumed to be accommodated on the sites as listed in Table 13 of the Plan, which is broken down below (See Tables 4.5 and 5.16 of the Employment Land Review 2022):

	Gross Supply (sqm)
Planning permissions	23,820
SIL	3,204
LIL	2,948
LMUA	14,135
MBOA	110
Non-designated	3,423
Sites with industrial potential in planning	95,500
Albert Island	55,500
G-park	40,000
Sites with potential for intensification (Assuming existing coverage @65% and potential coverage @120%)	351,945
SIL:	
Bidder Street (LMUA to SIL)	175,945
London Industrial Park	12,815
Thameside East	66,000
Thameside West (Pinchins Wharf – Nuplex/Allnex)	27,500
Bow Goods Yard	25,630
	44,000
LIL:	
Stephenson Street (West Ham garage site)	176,000
Land East of City Airport	22,000
Folkestone Road Depot	38,500
Beckton Gateway (Jenkins Lane depot)	55,000
Grantham Road	55,000
	5,500
Total	471,265

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?

Council Response:

The majority of the definitions in the Plan's Glossary (Appendix 1) are consistent with national planning policy, both the glossary in the NPPF 2023 and the glossary in the NPPF 2025. However, the following definitions, listed below, do deviate from the text in the NPPF glossary (2023, 2025). The justification for this deviation has been set out in the table below.

Glossary Term	Justification
Affordable home ownership	Local Plan definition is in conformity with the London Plan (2021)
Affordable housing	Local Plan definition is in conformity with the London Plan (2021)
Affordable rent housing	Local Plan definition is in conformity with the London Plan (2021)
Open space	Local Plan definition is in conformity with the London Plan (2021)
Self-build and Custom build housing	Broadly aligns with the NPPF 2023 and NPPF 2025 glossary definitions.
Special Areas of Conservation (SAC)	Definition aligns with the EU Habitats Directive (Council Directive 92/43/EEC)
Sustainable Urban Drainage System (SuDS)	Not included in the NPPF 2023 glossary. The Local Plan definition is not identical to the NPPF 2025 term; however, the Local Plan definition is not contradictory to the NPPF 2025.
Town Centres	Local Plan definition is in conformity with the London Plan (2021)