



Examination of Newham Local Plan

Inspector: William Fieldhouse BA (Hons) MA MRTPI

Programme Officer: Charlotte Glancy

Tel: 07519 628064

Email: bankssolutionsuk@gmail.com

Examination website: [Local Plan Examination Overview – Newham Local Plan Examination – Newham Council](#)

IN3: Inspector's matters, issues and questions; written statements; and hearings programme

Introduction

This note sets out:

- The matters, issues and questions that will be the focus of the examination (**Annex 3**).
- Advice about, and deadlines for, submitting written statements in response to the matters, issues and questions (**Annex 1**).
- A draft programme for the hearing sessions (**Annex 2**).
- A deadline of **midday on Thursday 24 October 2025** to inform the Programme Officer if you wish to participate at one or more of the hearing sessions.

Council's responses to Preliminary Questions

I published Preliminary Questions, Further Preliminary Questions and Supplementary Questions on 10 and 11 September and 1 October 2025 respectively¹. The Council's responses were published on 30 September and 7 October 2025². Where relevant, I refer to those responses in my matters, issues and questions.

Matters, issues and questions

My matters, issues and questions, which will be the focus of the examination, are set out in **Annex 3** to this note.

Written statements

The Council should produce a statement for every matter in Annex 3.

Any representor may submit statements answering questions that relate to their original representations. Statements should set out the key points from the original representation against the relevant questions.

¹ IN2 and IN2.1.

² ED001 to ED003 and ED004.

Written statements (one paper copy, as well as Word or PDF by email) must be received by the Programme Officer by the following deadlines:

- Midday on **Thursday 6 November 2025** – statements for **matters 1 to 4**.
- Midday on **Thursday 27 November 2025** – statements for **matters 5 to 15**.

Information about the format, content and length of written statements is set out in **Annex 1**. I may not consider statements that do not follow the advice in Annex 1.

Hearings programme

The hearings will be held at:

- Newham Council Office, 1000 Dockside Road, London E16 2QU

and take place over a total of 12 days between:

- Tuesday 2 December 2025 and Thursday 5 February 2026.

Hearing sessions will start at **9.30 am** on each sitting day.

A provisional hearings programme is set out in **Annex 2**. I will review this when I have read the written statements and considered the request to participate in the hearings (see below); any changes will be announced on the examination website.

Participating in the hearings

If you made a representation under regulation 20 seeking to change a relevant part of the Plan and wish to participate at the hearing session when that issue is being considered, you should inform the Programme Officer by **midday on Wednesday 23 October**. If you do not respond by that time, it will be assumed that you do not wish to participate, irrespective of what you may have indicated in your regulation 20 representation. When responding, please specify which matter(s) and issue(s) that you wish to participate in.

Further information

Further information about the examination procedures is set out in my Guidance Note published on 20 August 2025³. Any queries about the examination should be taken up with the Programme Officer.

William Fieldhouse

9 October 2025

³ IN1.

Written statements

The Council should produce a statement for every matter in Annex 3. Any representor may submit statements answering questions that relate to their original representations. Statements should set out the key points from the original representation against the relevant questions.

Length of statements

All statements should be concise and focussed on the questions, and in any event must contain no more than **3,000 words** for each matter.

Because the Council should answer every question, it may in some cases be necessary to exceed the limit of 3,000 words per matter. However, the Council's statements need not repeat the answers it has provided to my Preliminary, Further Preliminary or Supplementary Questions or parts of the Plan or evidence documents. Rather, they should refer to specific parts of the Plan's reasoned justification if that adequately answers the question, and/or briefly summarise relevant parts of an evidence document.

Artificial intelligence

If you use artificial intelligence (AI) to create or alter any part of your statement you should make this clear and follow the Planning Inspectorate's guidance

<https://www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence>

Evidence

Written statements are not the opportunity to introduce new evidence. Rather, they should refer to relevant evidence on the examination website including that which was submitted with representations made under regulation 20. Reference should be made to particular parts of that evidence (with document title, reference number and page and paragraph numbers), with a clear explanation of how it relates to my question.

Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework published in December 2023 ("NPPF")⁴ (paragraph numbers) and associated Planning Practice Guidance ("PPG") (eg ID: 61-001-20190315) with an explanation of why you think the policy in question is consistent or inconsistent with it. However, there is no need to quote extensive parts of the NPPF or PPG.

If the Council or any representor considers that there is evidence that it is essential to refer to in order to answer one of my questions, but which is not on the examination website, please check with the Programme Officer before submitting it. I will consider any such request having regard to the relevance of the evidence and the reason why it had not been submitted earlier. If I decide to accept it, it will be published in the examination library.

⁴ The transitional arrangements in paragraphs 234 to 236 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.

Modifications to the Plan

If your response to one of my questions concludes that the relevant part of the Plan is not sound, please set out how you think it should be modified to ensure that it is.

Submitting statements

All statements must include your name and representor reference number in the top right corner of each page. One paper copy, as well as Word or PDF format by email, must be received by the Programme Officer by the following deadlines:

- Midday on **Thursday 6 November 2025** – statements for **matters 1 to 4**.
- Midday on **Thursday 27 November 2025** – statements for **matters 5 to 15**.

Written statements will be published on the examination website as soon as possible after the deadline so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be posted or emailed directly to participants. Anyone who is unable to access them on the website should contact the Programme Officer.

Once the date for submitting written statements has passed, no other written evidence should be submitted, unless I specifically request it.

Further information

Any queries about how to prepare or submit written statements should be taken up with the Programme Officer.

End of Annex 1

Provisional hearings programme

Week One

Tuesday 2 December 2025

M1. Legal, procedural and other general matters

- Duty to cooperate
- Public consultation
- Equalities
- Superseded policies in adopted plans
- Strategic policies
- Plan policies, reasoned justification and other parts
- Information requirements for applicants
- Integrated impact appraisal
- Habitat regulations assessment
- Viability

M2. Amount of development required in the plan period

- Plan period
- Housing requirement
- Industrial and office floorspace requirements

Wednesday 3 December 2025

M3. Spatial strategy

- Spatial strategy (BFN1)
- Tall buildings (D4)
- Neighbourhood enhance areas (D3 part 5)

M4. Neighbourhoods and allocations (general issues and N17)

- Site allocations – capacity and trajectories
- Site allocations and flood risk

Royal Docks and Beckton Riverside Opportunity Area

- N17 Gallions Reach (1 allocation)

Thursday 4 December 2025

M4. Neighbourhoods and allocations (N1 to N5)

Royal Docks and Beckton Riverside Opportunity Area

- N1 North Woolwich (2 allocations)
- N2 Royal Victoria (5 allocations)

- N3 Royal Albers North (1 allocation)
- N4 Canning Town (5 allocations)
- N5 Custom House (4 allocations)

Week Two

Tuesday 9 December 2025

M4. Neighbourhoods and allocations (N8)

- N8 Stratford and Maryland (10 allocations)

Wednesday 10 December 2025

M4. Neighbourhoods and allocations (N6 and N7)

Poplar Riverside Opportunity Area

- N6 Manor Road (0 allocations)
- N7 Three Mills (3 allocations)

Thursday 11 December 2025

M4. Neighbourhoods and allocations (N9 to N16)

- N9 West Ham (1 allocation)
- N10 Plaistow (4 allocations)
- N11 Beckton (3 allocations)
- N12 East Ham South (0 allocations)
- N13 East Ham (3 allocations)
- N14 Green Street (1 allocation)
- N15 Forest Gate (2 allocations)
- N16 Manor Park and Little Ilford (0 allocations)

Week Three

Tuesday 20 January 2026

M5. Housing land supply

- Housing land supply for plan period
- Five year housing land supply following adoption

M7. Gypsy and Traveller accommodation

- Need for additional Gypsy and Traveller accommodation
- Sites for additional Gypsy and Traveller accommodation

Wednesday 21 January 2026

M6. Housing development management policies

- H2 Protecting and improving existing housing
- H3 Affordable housing
- H4 Housing mix
- H5 Build to rent
- H6 Supported and specialist housing
- H7 Specialist housing for older people
- H8 Purpose built student accommodation
- H9 Houses in multiple occupation and large scale purpose built shared living
- H11 Housing design and quality

Thursday 22 January 2026

M8. Economic development

- J1 Employment and growth
- J2 New employment floorspace
- J3 Protecting employment floorspace
- J4 Community Wealth Building and Inclusive Growth
- Industrial floorspace supply
- Office floorspace supply

M9. Town centres

- HS1 Town centre network
- HS2 Managing new and existing town centres
- HS3 Edge of centre and out of centre development
- HS4 Markets and events
- HS5 Visitor evening and night time economy
- HS6 Health and wellbeing on the high street
- HS7 Delivery-led businesses
- HS8 Visitor accommodation

Week Four

Tuesday 3 February 2026

M10. Design

- BFN2 Co-designed masterplanning
- D1 Design standards
- D2 Public realm net gain
- D5 Shopfronts and advertising
- D6 Neighbourliness
- D7 Conservation areas and areas of townscape value
- D8 Archaeological priority areas
- D9 Designated and non-designated heritage assets

M11. Climate Emergency

- CE1 Environmental design
- CE2 Zero carbon development
- CE3 Embodied carbon and the circular economy
- CE4 Overheating
- CE5 Retrofit and circular economy
- CE6 Air quality
- CE7 Flood risk
- CE8 Sustainable drainage

Wednesday 4 February 2026

M12. Green and Water Spaces

- GWS1 Green spaces
- GWS2 Water spaces
- GWS3 Biodiversity, urban greening and access to nature
- GWS4 Trees and hedgerows
- GWS5 Play and informal recreation for all ages

M13. Social Infrastructure

- BFN3 Social value and health impact assessments
- SI1 Existing community facilities and health facilities
- SI2 New and re-provided community facilities
- SI3 Cultural facilities and sport and recreation facilities
- SI4 Education and childcare facilities
- SI5 Burial space and related facilities

M15. Waste management

- W1 Waste management capacity
- W2 New or improved waste sites
- W3 Waste management in developments

Thursday 5 February 2026

M14. Transport and infrastructure

- T1 Strategic transport
- T2 Local transport
- T3 Transport behaviour change
- T4 Servicing development
- T5 Airport
- W4 Utilities and digital connectivity infrastructure
- BFN4 Developer contributions and infrastructure delivery

M16. Other soundness and legal compliance issues

General conformity with London Plan

Next steps in the examination

End of Annex 2

Matters, Issues and Questions

I will consider the following matters, issues and questions to help decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is. My introduction to each issue refers, where relevant, to the Council's responses to my Preliminary and Further Preliminary Questions⁵.

M1. Legal and procedural requirements and other general matters

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.

The Council's response to PQ4 advises that no local planning authorities or other prescribed bodies have claimed that the duty to cooperate has not been complied with.

The Council's responses to PQ6 and PQ7 advise that it expects to finalise statements of common ground with the Mayor of London by 21 November 2025 and Thames Water by 14 November 2025 following further discussions about housing delivery and evidence relating to odour from Beckton Sewage Works respectively.

Q1.1. Is there any substantive evidence to indicate that the Council failed to comply with the duty to cooperate during the preparation of the Plan up until the date on which it was submitted for examination?

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 2022⁸.

Q1.2 Was the consultation carried out by the Council during the preparation of the Plan in compliance with the statement of community involvement and relevant legal requirements?

⁵ ED001 to ED005.

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].

⁸ SD017 section 1.

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 characteristic⁹ 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 Assessment¹⁰. 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.

Notwithstanding that, the Council's response to PQ3 summarises a number of concerns raised in representations made under regulation 20 about the impact of the Plan on persons who share relevant protected characteristics. I will consider those issues under subsequent matters as part of my assessment of the soundness of relevant policies.

Q1.3 Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

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.

The Council's response to PQ7 advises that it disagrees with the Mayor's opinion that the Plan is not in general conformity with the London Plan, and sets out its reasons why in relation to both issues. The response goes on to advise that, if necessary, main modifications can be made to local plans to bring them into general conformity (citing the examples of Waltham Forest and Richmond).

I will return to the question of general conformity later in the examination when I have considered my other matters, issues and questions, including those relating to housing targets and supply, and affordable housing.

Superseded policies

⁹ Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

¹⁰ SD06.

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. The Council's response to PQ8 proposes a main modification to the Introduction to the Plan to add the following sentence:

"This Local Plan replaces the following Development Plan documents for Newham: the Newham Local Plan 2018, the Newham Gypsy and Traveller Development Plan Document 2017 and the London Legacy Development Corporation Local Plan 2020".

Q1.4 Will the Council's proposed main modification be effective in ensuring compliance 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.

The Council's response to PQ9 lists the policies in the Plan that are 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.

I will consider soundness issues associated with those policies under subsequent matters.

Strategic priorities

Local plans are required by section 19(1B) of the 2004 Act to identify the local planning authority's strategic priorities for the development and use of land in the their area. The Council's response to PQ10 advises that the strategic priorities are set out in the Vision and Objectives section of the Plan which informed the strategic policies.

I will consider soundness issues associated with the Plan's policies under subsequent matters.

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 relevant to determining whether local plan policies should be defined as "strategic".

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

The Council's response to PQ16 explains why it considers all of the strategic policies to meet the relevant criteria in the NPPF and PPG.

Q1.5 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?

The Plan's policies, reasoned justification and other parts

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 policy¹¹. A local plan must contain a reasoned justification of the policies contained in it¹².

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.

The Council's response to PQ12 advises that the policies in part 1 of the Plan are contained in:

- The coloured boxes with a heading such as BFN1 spatial strategy, including any Tables within those boxes (eg the text in Table 1 Tall Building Zones).

None of the other text in part 1 of the Plan (including the statements under the heading Planning obligations and in the Implementation boxes) is intended to be "policy".

The Council's response to PQ14 advises that the following in part 2 of the Plan are intended to be policies for the purposes of section 17 of the 2004 Act:

- Policies N1 to N17 in the coloured boxes which state "The vision for ... will be achieved by ..." followed by a numbered list of statements and requirements.
- Site allocation boxes setting out factual information (site address, site area, PTAL, flood risk, etc).
- Site allocation boxes setting out development principles, design principles, infrastructure requirements and information about phasing and implementation.

None of the other text in part 2 of the Plan is intended to be "policy".

The Council's responses to PQ14 and PQ15 clarify that the site allocation maps are not intended to be policy. They are intended to provide an indicative visual representation of how the design and development principles outlined in the site allocation policies could potentially be achieved. The optimal design and layout for each site will be discussed and agreed at the design stage through masterplanning and the planning application process.

Q1.6 (a) Does the Plan need to be modified to clarify (i) which parts are policies for the purposes of section 17 of the 2004 Act, and/or (ii) the purpose / status of the site allocation maps?

¹¹ Section 17 of the 2004 Act.

¹² Regulation 8.

(b) Are the site allocation boxes in Part 2 of the Plan setting out factual information (site address, site area, PTAL, flood risk, etc) “policy”?

Local plans should be succinct, focussed, concise, accessible as possible and serve a clear purpose; they should contain policies that are clearly written and unambiguous¹³.

Supplementary planning documents can be used to build upon and provide more detailed advice or guidance on policies in an adopted local plan¹⁴.

The Council’s responses to PQ11 and PQ13 set out why the Council considers the Plan to be succinct, focussed, concise and accessible, and why it contains Implementation sections for each policy in part 1.

Throughout the examination, my assessment of soundness will focus on the wording of the policies, rather than the wording of the other parts of the Plan. This is reflected in my issues and questions set out under subsequent matters. It is not my role to “improve” the Plan, for example by adding or changing detailed wording in the reasoned justification, implementation guidance or text that is not policy, unless that is essential for soundness.

Information requirements for planning applications

Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every two years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question¹⁵.

Various policies and other parts of the Plan require applicants for planning permission to provide particular types of information (assessments, strategies, evidence to demonstrate compliance with specified guidance or standards, etc).

The Council’s response to FPQ1 lists all of the information requirements set out in policies in the Plan - around 60 different items in total. The Council’s response also indicates how, in some cases, these could be integrated into another document such as a Planning Statement, Design and Access Statement, Environmental Impact Statement, Transport Assessment, etc. The response explains why the Council considers it necessary to include them in Plan policies, rather than on a published list which the Council would review at least every two years.

Q1.7 Is the approach of specifying in the Plan’s policies particular information requirements for applicants consistent with national policy and will it be effective and up to date over the lifetime of the Plan?

Glossary and abbreviations

¹³ NPPF 15 and 16, and PPG ID: 61-002-20190315.

¹⁴ PPG ID: 61-008-20190315.

¹⁵ NPPF 44.

Appendix 1 contains a glossary of terms and abbreviations used in the Plan. The Council's response to PQ41 advises that these are all consistent with Annex 2 to the NPPF with 8 exceptions relating to:

- Affordable home ownership
- Affordable housing
- Affordable rent housing
- Open space
- Self-build and custom build housing
- SUDS
- Town centres

Where relevant, I consider whether those differences to national policy definitions affect the soundness of the Plan under subsequent matters and issues.

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 pursued¹⁶.

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 soundness¹⁷. The reasonable alternatives should take account of the objectives and geographical scope of the plan¹⁸.

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 2025¹⁹.

Paragraphs 4.3.3 to 4.3.36 of the Integrated Impact Assessment (pages 42 to 49) and Appendix E of the Integrated Impact Assessment (pages 115 to 261) describe 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.

The Council's response to PQ17 advises that no representations made under regulation 20 claim that the Integrated Impact Assessment failed to identify reasonable alternatives to the Plan.

Where relevant, I will consider the findings of the Integrated Impact Assessment as part of my assessment of soundness under subsequent matters.

¹⁶ NPPF 32.

¹⁷ NPPF 35b and The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

¹⁸ SEA Regulation 12(2).

¹⁹ SD006.

Q1.8 Is there any substantive evidence to indicate that the Integrated Impact Assessment fails to meet relevant legal requirements?

Habitat Regulations Assessment

A Habitat Regulations Assessment was carried out to inform the Plan²⁰. The screening found that significant effects are not likely on the following sites due to their distance from the Borough and the absence of reasonable pathways: Lee Valley SPA; Lee Valley Ramsar; Wimbledon Common SAC; Richmond Park SAC; Thames Estuary and Marshes SPA; and Thames Estuary and Marshes Ramsar. However, significant effects could not be excluded for the Epping Forest SAC in terms of air quality and recreational pressure.

An appropriate assessment was therefore undertaken in relation to Epping Forest SAC. This found that, subject to the mitigation measures that are required by policies in the Plan (including T3 transport behaviour change and GWS3 part 7 relating to Epping Forest SAC), there would be no adverse impacts on the integrity of the SAC.

Natural England agree with the findings of the Habitat Regulations Assessment, subject to a modification to the wording of policy GWS3 part 7 and the associated implementation guidance²¹. I will consider those proposed modifications under matter 12.

Q1.8 Is there any substantive evidence to indicate that the Habitat Regulations Assessment fails to meet relevant legal requirements?

Viability

Local plans should be informed by a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy and section 106. The assessment should demonstrate that the total cumulative cost of all relevant policies will not undermine deliverability²².

The Council's Local Plan Viability Assessment (April 2024)²³ tested the impact of the main policies which may have an impact on viability using a residual land value and development typology approach.

Tables 6.60.4, 6.60.5 and 6.60.6 set out the cumulative impact of the Plan's policy requirements, including 60% affordable housing, for all of the typologies on three benchmark land values (secondary offices £6.3m per hectare; secondary industrial £5.3m per hectare; and cleared/undeveloped land £0.5m per hectare). Paragraph 6.60 explains that the "baseline" residual land value in the tables includes employment and training contributions, s106 contributions, s278 contributions, CIL, electric vehicle charging, SAMM contributions, and (where relevant) site specific infrastructure costs.

Q1.9 Does the viability evidence make reasonable assumptions, including about:

²⁰ SD008.

²¹ Statement of Common Ground SD056.

²² PPG ID:10 (2019).

²³ EB099.

- (a) The cost of meeting all of the policy requirements included in the Plan along with any other relevant national standards.
- (b) The value of development.
- (c) Benchmark land values (the price a willing landowner would be likely to sell their land for).

Q1.10 Does the viability evidence indicate that the total cumulative cost of all relevant policies will not undermine the viability of the development that the Plan assumes will take place during the plan period, including on each of the site allocations?

M2. Amount of development required in the plan period

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 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.

Notwithstanding that, the Council’s response to PQ19 advises that it considers that the Plan could be adopted with a shorter than 15-year period (for the reasons set out in paragraph i.10). However, the response goes on to state that if that is not possible the relevant evidence base projections that look to 2038 could be updated to 2042 and this would not result in any significant changes affecting the soundness of the plan.

The Council’s response to PQ19 also includes further information about the implications of extending the plan period to 2042 for the housing and employment land requirements in policies H1 and J1 which I consider below. Q2.1 is about the principle of adopting a plan with strategic policies that look ahead 11 years from adoption.

Q2.1 (a) Are the reasons given by the Council sufficient justification for the strategic policies in the Plan looking ahead 11 years from adoption? (b) If not, should the Plan be modified so that the strategic policies look ahead to 2042?

Housing requirement in the submitted plan for 2023 to 2038

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 Council's response to PQ20(a) suggests a modification to paragraph 3.174 intended to clarify that the Plan's minimum housing requirement is 51,425 (which is the bottom of the range referred to in policy H1 and the total of the annual delivery targets in the Table following paragraph 3.174).

The Council's response to PQ20(b) advises that the purpose of policy H1 referring to a net increase of between 51,425 and 53,745 homes is to reflect an approach intended to optimise capacity on site allocations (and specific information relating to a number of sites that indicates the potential for the delivery of more homes than assumed in the minimum requirement figure of 51,425).

Paragraph 3.174 explains that the range target is capacity-derived based on:

- Approved planning permission figures.
- Design-led capacity testing of site allocations.
- Capacity assumptions from the GLA 2017 Strategic Housing Land Availability Assessment.
- Capacity assumptions from lapsed application sites.
- Capacity assumptions on small sites set out in the London Plan.

The Table following paragraph 3.174 sets out a stepped trajectory with different annual delivery targets for the periods 2023-2028, 2028-2033, and 2033 to 2038. Paragraph 3.175 explains that the targets for those periods reflect the expected trajectories for the sites in the identified housing land supply.

The Council's response to PQ19 seems to suggest that, as the Plan's housing requirement is capacity-derived, the requirement for an extended plan period to 2042 would be increased to reflect:

- Additional capacity on some of the larger site allocations where development is expected to continue after 2038.
- Rolling forward the capacity assumptions for small sites in the London Plan.

I will consider the housing land supply identified in the Plan, and whether the capacity assumptions are justified, under matter 4. I am not, therefore, considering under this matter whether the actual figures in policy H1 or the targets for the different five year periods are justified. The following questions relate to the principle of the approach in the Plan to setting a housing requirement.

Q2.2 (a) Does policy H1 and/or the reasoned justification need to be modified to clarify what the Plan's minimum housing requirement is (irrespective of the specific figure)? (b) Is the approach of basing the housing requirement (irrespective of the specific figure) on capacity, rather than need, justified and consistent with the London Plan? (c) Is the reference to a target range justified and does it provide an effective and unambiguous approach (irrespective of the specific figures)?
--

- (d) Is the inclusion of a stepped requirement (irrespective of the specific figures) consistent with national policy and guidance²⁴?
- (e) If a stepped trajectory is justified (irrespective of the specific figures), does the Plan need to be modified to include it in policy H1 rather than in the reasoned justification to be consistent with national policy and guidance?

London Plan target 2019 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 2029.²⁵ 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 2025²⁶ 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 homes²⁷ compared to the London Plan target taking into account the shortfall in completions between 2019 and 2023.

As the targets in the Plan for the period 2023 to 2029 (and the rest of the plan period) are capacity-derived, I will consider whether they are justified in those terms under matter 4. The following question is about the principle of whether the Plan should refer to the London Plan target.

Q2.3 To be consistent with the London Plan, does policy H1 and/or the reasoned justification need to be modified to include reference to the London Plan target of 47,600 homes for 2019 to 2029 and/or to a residual target of 35,954 homes for 2023 to 2029²⁸ (irrespective of whether the evidence demonstrates that actual delivery will be lower in those periods)?

Industrial and office floorspace requirements

²⁴ PPG ID:68-021-20190722.

²⁵ $2,974 \times 5 = 14,870$. $14,870 + 3,836 = 18,706$.

²⁶ EB058.

²⁷ $7,394 + 9,854 = 17,248$.

²⁸ $47,600 - 11,646$ (completions 2019 to 2023) = 35,954

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

The Council's response to PQ19 advises that the industrial floorspace target is based on a past trend in job delivery 2009-2019 and therefore this could be extended forward to 2042 on a pro rata basis.

The Council's response to PQ19 advises that the office floorspace target, which is based on an economic forecast, could be extended to 2042. However, national policy expects planning policies to look ahead at least ten years when considering the need for office and other main town centre uses²⁹.

Q2.4 Are the identified requirements for industrial and office floorspace in policy J1 justified? If the Plan needed to be modified to look ahead to 2042, how, if at all, would those requirements need to be modified?

M3. Spatial strategy

This matter is concerned with the Plan's spatial strategy which is set out in policy BFN1. However, there are also other policies in the Plan, particularly D4 (tall building zones) and D3 (neighbourhood enhancement areas), that are significant to the spatial strategy. The expression of the spatial strategy through the 17 neighbourhood and 45 site allocation policies in part 2 of the Plan is considered under matter 4.

BFN1 Spatial strategy

The Council identified and appraised four reasonable alternative spatial strategies during the preparation of the Plan³⁰:

- The spatial strategy set out in policy BFN1.
- The Arc of Opportunity and Urban Newham approach set out in the adopted Local Plan.
- Direct significant levels of growth at high density to all neighbourhoods.
- Direct significant levels of growth to Stratford as Metropolitan Centre and to Opportunity Areas only.

Q3.1 Does policy BFN1 set out an appropriate spatial strategy, taking account of reasonable alternatives, in the context of the London Plan? In particular:

a) Directing significant levels of growth to the six neighbourhoods (N1, N2, N3, N4, N5 and N17) in the Royal Docks and Beckton Riverside Opportunity Area; two neighbourhoods (N6 and N7) in the Poplar Riverside Opportunity Area; and the N8 Stratford and Maryland neighbourhood?

b) Supporting incremental change in all of the other neighbourhoods (N9 to N16)?

Tall Building Zones

²⁹ NPPF 90(d).

³⁰ IIA 4.3.12 and Appendix E section 5.2 (SD006 and SD007).

Policy BNF1 part 2(b) supports tall buildings (over 21 metres) in the borough's Tall Building Zones. Policy D4 states that tall buildings will only be acceptable in the 22 designated Tall Building Zones which are listed in Table 1, indicated on a map in the Plan, and designated on the policies map. Table 1 specifies a "height range maximum" for each Zone, expressed in terms of metres (and approximate number of storeys). These are reflected in the policies for the neighbourhoods and site allocations in part 2 of the Plan.

The Newham Characterisation Study 2024, and in particular the Tall Buildings Annex 2024³¹, seem to provide the main evidence.

National policy expects planning policies to support development that makes efficient use of land and optimises densities whilst taking account of the identified need for different types of housing and other development; local market conditions and viability; the availability and capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of creating well designed places³².

Q3.2 Are the Tall Building Zones listed in policy D4 Table 1 and designated on the policies map, and the "height range maximum" for each, justified and will they be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

Neighbourhood "enhance" areas

Various neighbourhood policies support a moderate uplift in density in "enhance" areas. This seems to be in accordance with policy D3 part 5. Implementation box D3.4, D3.5 and D3.6 advises that "enhance" areas are areas of mixed quality where new developments can provide positive enhancements to the overall character. The Characterisation Study chapter 7 advises that the majority of the Borough is an enhance area, and includes a map indicating its geographical extent. Chapter 8 includes more detailed maps for each neighbourhood³³.

National policy states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that developments make optimal use of the potential of each site. Planning policies should include the use of minimum density standards³⁴. Policy D3 sets out a design-led approach to optimising site capacity.

Q3.3 Is policy D3 justified and will the support for a moderate uplift in density in "enhance areas" be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

Q3.4 For policy D3 and relevant N policies to be effective:

- a) Should part 2 of the Plan explain / describe where the "enhance" areas are in each neighbourhood?
- b) Should the policies map illustrate geographically the "enhance" areas?

³¹ EB023 to EB027.

³² NPPF 128.

³³ EB014 to EB018.

³⁴ NPPF 129 and 130.

M4. Neighbourhood policies and allocations

This matter considers the expression of the spatial strategy through the 17 neighbourhood policies and all of the site allocations in part 2 of the Plan.

The Council's response to PQ14 advises that the following in part 2 of the Plan are intended to be policies for the purposes of section 17 of the 2004 Act:

- Policies N1 to N17 in the coloured boxes which state "The vision for ... will be achieved by ..." followed by a numbered list of statements and requirements.
- Site allocation boxes setting out factual information (site address, site area, PTAL, flood risk, etc).
- Site allocation boxes setting out development principles, design principles, infrastructure requirements and information about phasing and implementation.

None of the other text in part 2 of the Plan is intended to be "policy".

The Council's responses to PQ14 and PQ15 clarify that the site allocation maps are not intended to be policy. They are intended to provide an indicative visual representation of how the design and development principles outlined in the site allocation policies could potentially be achieved. The optimal design and layout for each site will be discussed and agreed at the design stage through masterplanning and the planning application process.

Whether the Plan needs to be modified to clarify the above was considered under matter 1.

Before considering the neighbourhood and site allocation policies, there are two issues that are relevant to all or most of the allocations.

Site allocations – capacity and trajectory

The allocation policies in the Plan indicate the types of development proposed on the site and when that is expected to take place expressed in terms of short, medium and long term. Based on the delivery periods for the stepped housing trajectory set out in paragraph 3.174, those periods are 2023-2028, 2028-2033 and 2033-2038.

However, the submitted Plan does not identify how many homes and square metres of non-residential development it assumes will be provided on each site. Nor does it set out a housing trajectory illustrating the expected rate of housing delivery over the plan period as referred to in NPPF 75.

The Council's response to PQ23 advises that in total the allocations in the Plan are expected to accommodate a total of 38,094 homes between 2023 and 2038. The response to PQ24 includes a Table setting out the number of homes assumed on each allocation that add up to 38,094. A housing trajectory for each allocation (based on the information available when the Plan was prepared) is set out in a spreadsheet provided as part of the response to PQ24. Those trajectories indicate that the vast majority of allocations are expected to contribute to meeting the five year requirement following adoption (ie during the period 1 April 2037 to 31 March 2032 – which includes the last year of "short term" and the first four years of "medium term").

The Council's Site Capacity Testing Summary Report published on 30 September 2025 provides information upon which the capacity and trajectory for each allocation is based³⁵.

The Council's response to PQ27 advises that it expects to publish updated housing land supply evidence relating to 1 April 2025 by 21 November 2025.

I may publish supplementary questions about the capacity assumptions and trajectories for the site allocations, and other aspects of housing land supply, when I have considered the updated housing land supply information after 21 November 2025 (see matter 5).

Site allocations and flood risk

Many of the allocations are at medium or high risk of flooding, due to being in flood zone 2 or 3 and/or if the Thames were to breach its bank and defences fail and/or from surface water flooding. The Council's evidence advises that all of the site allocations included in the Plan satisfy the sequential and exception tests³⁶. The Statement of Common Ground with the Environment Agency indicates they are in agreement with that conclusion.

Q4.1 Are all of the allocations in the Plan justified and consistent with national policy relating to flood risk, and will development on each be safe for its lifetime?

N17 Gallions Reach

The Gallions Reach neighbourhood is in the south east of the Borough bounded by the A13 to the north, Royal Docks Road to the west, River Roding to the east, and River Thames to the south. The area includes the large Beckton Sewage Treatment Works and is mainly industrial and commercial in character although also contains large areas of open land with significant biodiversity value. Housing is being developed around the Docklands Light Railway (DLR) station, along with a new local centre although there are few community facilities. Much of the neighbourhood has poor public transport accessibility.

Policy BFN1 states that significant levels of growth will be directed to N17 Gallions Reach as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N17 aims to transform Gallions Reach into a new neighbourhood, with a large number of new homes, new and intensified employment uses and the creation of a new town centre and neighbourhood parade, through the delivery of an extended DLR line and a new DLR station (or similarly transformative public transport improvements).

Policy HS1 part 1 proposes a new district level town centre in Gallions Reach through re-configuring and capitalising on the trade draw of the out-of-centre retail park and part 2 sets out a number of principles for how that should be achieved.

Allocation N17.SA1 Beckton Riverside is a 85 hectare site comprising the existing Gallions Reach retail park, the Beckton DLR depot, a disused gas works, industrial uses designated

³⁵ ED003.

³⁶ Site Allocations Sequential Test (EB090).

as SIL, and areas of greenspace including designated SINC. The site is in flood zones 2 and 3, and at high risk if the Thames were to breach its bank and defences. Around 3,000 homes are expected to be built on the allocation in the plan period.

Q4.2 Are policies N17 and N17.SA1 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Gallions Reach neighbourhood? In particular:

- a) The dependence on an extension to the DLR and the creation of a new DLR station, or a similarly transformative public transport intervention (such as a new river crossing).
- b) The requirements relating to the scale, location, type and timing of development in relation to the provision of improved public transport infrastructure.
- c) The requirements relating to the creation of a new town centre and development at the existing Gallions Reach shopping park in N17 part 5, N17.SA1 and HS1 part 2.
- d) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- e) The requirement for development to deliver an automated vacuum waste collection system.
- f) The requirements relating to the mitigation of odour impacts from the Beckton Sewage Treatment Works.
- g) The assumption that around 3,000 homes will be built on site allocation N17.SA1 between 2028 and 2038.

N1 North Woolwich

The North Woolwich neighbourhood is located in the south east of the borough and is bounded by Royal Albert Dock to the north and the River Thames to the south. Albert Road, the DLR and Elizabeth Line cross the neighbourhood, which includes London City Airport, a number of industrial estates designated as SIL, residential areas and a local centre. There are two DLR stations, but public transport accessibility is generally poor.

Policy BFN1 directs significant levels of growth to N1 North Woolwich as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N1 aims to achieve incremental change across the neighbourhood through a moderate uplift in density in “enhance” areas along with the transformation of N1.SA1 North Woolwich Gateway and N1.SA2 Rymill Street.

Allocation N1.SA1 is a 2.5 hectare site which includes the North Woolwich Ferry Bus Stand, a former railway station and vacant brownfield land.

Allocation N1.SA2 is a 0.6 hectare site which comprises a former temporary school and vacant land.

A total of around 490 homes are expected to be built on the two allocations in the neighbourhood during the plan period.

Q4.3 Are policies N1, N1.SA1 and N1.SA2 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the North Woolwich neighbourhood? In particular:

- a) The proposals for improvements to public transport, walking and cycling infrastructure.
- b) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- c) The assumption that around 350 homes will be built on N1.SA1 between 2027 and 2029.
- d) The assumption that around 140 homes will be built on N1.SA2 between 2028 and 2033.

N2 Royal Victoria

The Royal Victoria neighbourhood is located in the south west of the borough and is bounded by Victoria Dock Road to the north and the River Thames to the south. North Woolwich Road, Connaught Bridge and the DLR cut across the neighbourhood which includes the Royal Victoria Dock, Pontoon Dock, the Excel conference centre and a variety of residential, commercial and industrial areas (including SIL). There are DLR and Elizabeth Line stations, but public transport accessibility is generally poor.

Policy BFN1 directs significant levels of growth to N2 Royal Victoria as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N2 aims to create a unique, cohesive and lively city neighbourhood that benefits from a high level of growth delivered through the transformation of key sites at N2.SA1 Silvertown Quays, N2.SA2 Lyle Park West, N2.SA3 Connaught Riverside and N2.SA4 Thameside West.

N2.SA1 Silvertown Quays is a 21 hectare site comprising vacant land, vacant heritage assets and waste management sites.

N2.SA2 Lyle Park West is a 7.8 hectare site including a DLR station, employment, residential and waste management uses.

N2.SA3 Connaught Riverside is a 12.9 hectare site including residential, employment and waste management uses.

N2.SA4 Thameside West is an 18.8 hectare site including employment and waste management uses and a mooring point for the Riverbus Service. Part of the site is within the Silvertown Tunnel safeguarded area, and it is within the cable car protection zone.

N2.SA5 Excel Western Entrance is a 3.5 hectare site including the main entrance to the conference centre, open space, a nursery, offices and residential accommodation.

A total of around 7,660 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.4 Are policies N2, N2.SA1, N2.SA2, N2.SA3, N2.SA4 and N2.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Victoria neighbourhood? In particular:

- a) The requirements relating to exiting and improved transport infrastructure on site N2.SA1.
- b) The requirements relating to the location and design of employment uses on sites N2.SA2, N2.SA3 and N2.SA4 and the relationship with the adjoining existing industrial uses including SIL.
- c) The requirements relating to tall buildings.
- d) The assumption that around 2,900 homes will be built on N2.SA1 between 2028 and 2038.
- e) The assumption that around 800 homes will be built on N2.SA2 between 2028 and 2033.
- f) The assumption that around 1,380 homes will be built on N2.SA3 between 2028 and 2034.
- g) The assumption that around 2,400 homes will be built on N2.SA4 between 2026 and 2038.
- h) The assumption that around 140 homes will be built on N2.SA5 between 2028 and 2033.

N3 Royal Albert North

The Royal Albert North neighbourhood located in the south east of the borough is bounded by Royal Albert Way to the north, Royal Albert Dock to the south, Connaught roundabout to the west and River Thames to the east. There are a mix of uses including housing, hotels, offices (many vacant), a university campus, and an emerging marine-based industrial uses on Albert Island. There are three DLR stations, but public transport accessibility is generally poor.

Policy BFN1 directs significant levels of growth to N3 Royal Albert North as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N3 aims to create a vibrant and cohesive neighbourhood, home to new high quality employment uses, higher-education campus and residential developments supported by a new neighbourhood parade through the transformation of allocation N3.SA1 and completion of other developments underway.

N3.SA1 is a 29.8 hectare site containing, water sports centre, restaurant and gym, offices, a college, car parking, open space, a temporary energy centre, a listed public house and other heritage assets. A total of around 1,920 homes are expected to be built on the allocation in the plan period.

Q4.5 Are policies N3 and N3.SA1 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Albert North neighbourhood? In particular:

- a) The proposed realignment of Royal Albert Way and northern Connaught roundabout.
- b) The requirements relating to tall buildings, having regard to constraints associated with London City Airport.
- c) The assumption that around 1,920 homes will be built on N3.SA1 between 2025 and 2038.

N4 Canning Town

The Canning Town neighbourhood is in the west of the borough and is crossed by Barking Road, Newham Way and Silvertown Way. The area is predominantly residential but includes the Canning Town district centre, industrial and mixed use employment areas, and many greenspaces including part of the Lee Valley Regional Park in the south west. Public transport accessibility varies across the neighbourhood with the highest levels around Canning Town Station and the district centre.

Policy BFN1 directs significant levels of growth to N4 Canning Town as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N4 aims to deliver improvements to the district centre and high levels of growth through a moderate uplift in density in “enhance” areas along with the transformation of sites N4.SA1 Canning Town East, N4.SA2 Silvertown Way East, N4.SA3 Canning Town Holiday Inn, N4.SA4 Limmo and N4.SA5 Canning Town Riverside.

N4.SA1 is a 9.74 hectare site including housing, open space, a hostel and community facilities.

N4.SA2 is a 0.8 hectare site including industrial uses and a gym and boxing club.

N4.SA3 is a 0.7 hectare site comprising a hotel, associated car parking and a range of employment uses.

N4.SA4 is a 6.7 hectare site containing Canning Town railway and bus station, buildings and infrastructure associated with the Elizabeth Line, and vacant land.

N4.SA5 is a 4.4 hectare site containing industrial and waste management uses.

A total of around 3,340 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.6 Are policies N4, N4.SA1, N4.SA2, N4.SA3, N4.SA4 and N4.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in Canning Town neighbourhood? In particular:

- a) The requirements for the provision of employment uses, including B class, on site N4.SA3.
- b) The safeguarding of land for a bridge landing point on site N4.SA5.
- c) The requirements relating to waste management uses on site N4.SA5.
- d) The assumption that around 1,390 homes will be built on N4.SA1 between 2028 and 2038.
- e) The assumption that around 170 homes will be built on N4.SA2 between 2028 and 2033.
- f) The assumption that around 220 homes will be built on N4.SA1 between 2028 and 2033.
- g) The assumption that around 700 homes will be built on N4.SA4 between 2028 and 2038.

- h) The assumption that around 870 homes will be built on N4.SA5 between 2027 and 2033.

N5 Custom House

The Custom House neighbourhood is in the west of the borough and is crossed by Newham Way, Freemasons Road, Prince Regent Lane and Stansfield Road. It is predominantly residential but contains a local centre, a neighbourhood parade and green spaces. Public transport accessibility in the east of the neighbourhood is poor, with the highest levels around the DLR and Custom House stations.

Policy BFN1 directs significant levels of growth to N5 Custom House as one of the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N5 aims to regenerate the Custom House neighbourhood through the provision of new homes, improved public transport, a renewed local centre, a moderate uplift in density in “enhance” areas, and the transformation of allocations N5.SA1 Custom House land surrounding Freemasons Road and N5.SA2 Custom House Coolfin North.

N5.SA1 Custom House land surrounding Freemasons Road is a 4.2 hectare site comprising housing, Custom House local centre, a local growing space and a disused public house.

N5.SA2 Custom House Coolfin North is an 8 hectare site comprising housing, a school and open space.

N5.SA3 Custom House Land between Russell Road and Maplin Road is a 1.4 hectare site comprising houses and a shop.

N5.SA4 Royal Road is a 1.6 hectare site comprising fenced greenspace inaccessible to the public.

A total of around 1,170 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.7 Are policies N5, N5.SA1, N5.SA2, N5.SA3 and N5.SA4 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Custom House neighbourhood? In particular:

- a) The assumption that around 590 homes will be built on N5.SA1 between 2025 and 2029.
- b) The assumption that around 380 homes will be built on N5.SA2 between 2033 and 2038.
- c) The assumption that around 80 homes will be built on N5.SA3 between 2033 and 2038.
- d) The assumption that around 120 homes will be built on N5.SA4 between 2025 and 2026.

N6 Manor Road

The Manor Road neighbourhood is in the west of the borough and is bounded by the River Lea to the west and by train tracks and Manor Road to the east. It is in a variety of mainly industrial and storage uses (designated SIL), along with a few greenspaces.

Policy BFN1 directs significant levels of growth to N6 Manor Road as one of the two neighbourhoods in the Poplar Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N6 aims to create a successful employment focussed neighbourhood with improved connections to Tower Hamlets via new bridges over the River Lea and improved permeability and connectivity to surrounding areas. Growth is expected to be delivered through optimisation and intensification of industrial land for modern industrial uses.

There are no site allocations in the Manor Road neighbourhood.

Q4.8 Is policy N6 justified, consistent with the London Plan, and will it be effective in helping to encourage significant levels of growth and achieve sustainable development in the Manor Road neighbourhood?

N7 Three Mills

The Three Mills neighbourhood is located in the west of the borough. It is bounded by the High Street and the Greenway to the north, Manor Road to the east, Twelvetrees Crescent to the south and the River Lea to the west. It has mix of rich industrial heritage, industrial uses and housing and includes two conservation areas, various listed buildings, and green and water spaces (including part of the Lee Valley Regional Park).

Policy BFN1 directs significant levels of growth to N7 Three Mills as one of the two neighbourhoods in the Poplar Riverside Opportunity Area (which is in the Thames Estuary Growth Corridor identified in the London Plan).

Policy N7 aims to conserve and enhance the Three Mills neighbourhood's heritage and historic identity whilst delivering a high level of growth through a moderate uplift in density in "enhance" areas along with the transformation of N7.SA1 Abbey Mills, N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks and N7.SA3 Sugar House Island.

N7.SA1 Abbey Mills is a 7 hectare site including a temporary community facility, open space and vacant land.

N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks is a 20 hectare site comprising former gasholders and associated infrastructure, scrubland and hardstanding along with housing and mixed use areas.

N7.SA3 Sugar House Island is a 10 hectare site comprising vacant, cleared land and recently completed residential, employment, retail and education development.

A total of around 6,330 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.9 Are policies N7, N7.SA1, N7.SA2, and N7.SA3 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Three Mills neighbourhood? In particular:

- a) The requirements relating to existing and new community facilities on site N7.SA1 and whether they will be effective in meeting the particular needs of the local community.
- b) The requirements relating to open space and greenspace on site N7.SA1.
- c) The requirements relating to the establishment of a network of streets on, and routes to and from, site N7.SA1.
- d) The requirements relating to access and capacity improvements at West Ham and/or Abbey Road stations on site N7.SA1.
- e) The layout of development illustrated on the site maps.
- f) Whether the detailed policy requirements are consistent with extant planning permissions.
- g) The assumption that around 600 homes will be built on N7.SA1 between 2028 and 2033.
- h) The assumption that around 4,880 homes will be built on N7.SA2 between 2024 and 2038.
- i) The assumption that around 850 homes will be built on N7.SA3 between 2023 and 2033.

N8 Stratford and Maryland

Stratford and Maryland neighbourhood is an important economic centre for East London. It is bounded by the A12 to the north, the River Lea to the west and Stratford High Street / Greenway to the south and includes Stratford Town Centre, many office-based businesses, significant community and cultural facilities, established and recently developed residential areas, and many historic assets. The neighbourhood includes part of the former London Legacy Development Corporation area, and part of the Lee Valley Regional Park. The majority of the area has excellent public transport accessibility but severance is caused by the complex river, road and rail infrastructure network.

Policy BFN1 directs significant levels of growth to the N8 Stratford and Maryland neighbourhood which is part of the Olympics Legacy Opportunity Area and Elizabeth Line Growth Corridor identified in the London Plan.

Policy N8 aims to ensure that the neighbourhood continues to benefit from a high level of growth in terms of new housing, employment uses, shops, and leisure, community, cultural and higher educational facilities through a moderate uplift in density in “enhance areas” and transformation of ten site allocations (N8.SA1 to N8.SA10). This growth will enable the evolution of Stratford Town Centre to an international town centre and will be supported by significant improvements at Stratford Station.

N8.SA1 Stratford Central covers 21 hectares of the Town Centre including Stratford Shopping Centre and Cultural Quarter.

N8.SA2 Stratford Station covers 11.7 hectares including the train and bus stations and surrounding land and buildings.

N8.SA3 Greater Carpenters District covers 10.8 hectares of the Carpenter Estate to the south of the town centre and includes residential, employment, community facilities, education, retail and open space uses.

N8.SA4 Stratford High Street Bingo Hall is a 0.6 hectare site to the south of the town centre comprising an existing building and car park.

N8.SA5 Stratford Town Centre West covers 34.5 hectares including Stratford International Station, Stratford City Bus Station, Westfield Shopping Centre, and adjoining land and buildings.

N8.SA6 Stratford Waterfront South covers 5.8 hectares including part of the UCL campus and vacant land to the south west of the town centre.

N8.SA7 Rick Roberts Way is a 4.3 hectare site including a temporary community facility, gasholder infrastructure, storage use and vacant land.

N8.SA8 Bridgewater Road is a 4.01 hectare site including open space, allotments and vacant land.

N8.SA9 Pudding Mill covers 15.7 hectares to south of the Olympic Park including a DLR station, residential, industrial, employment, utilities infrastructure and waste management uses, vacant land and a temporary leisure and hotel use.

N8.SA10 Chobham Farm North is a 1.5 hectare site in the north of the neighbourhood that comprises employment uses and yard space.

A total of around 10,630 homes are expected to be built on the allocations in the neighbourhood during the plan period.

- Q4.10 Are policies N8, and N8.SA1 to N8.SA10 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Stratford and Maryland neighbourhood? In particular:
- a) The support in policy N7 part 1 for a moderate uplift in density in “enhance” areas.
 - b) The requirements relating to tall buildings, including in terms of viability and the effect on heritage assets.
 - c) The layout of development illustrated on the site maps.
 - d) Whether the detailed policy requirements are consistent with extant planning permissions.
 - e) The assumption that around 1,200 homes will be built on N8.SA1 between 2025 and 2038.
 - f) The assumption that around 1,310 homes will be built on N8.SA2 between 2025 and 2038.
 - g) The assumption that around 1,310 homes will be built on N8.SA3 between 2028 and 2038.
 - h) The assumption that around 150 homes will be built on N8.SA4 between 2028 and 2033.
 - i) The assumption that around 2,780 homes will be built on N8.SA5 between 2023 and 2038.

- j) The assumption that around 500 homes will be built on N8.SA6 between 2031 and 2032.
- k) The assumption that around 390 homes will be built on N8.SA7 between 2028 and 2033.
- l) The assumption that around 680 homes will be built on N8.SA8 between 2028 and 2033.
- m) The assumption that around 2,110 homes will be built on N8.SA9 between 2023 and 2033.
- n) The assumption that around 210 homes will be built on N8.SA10 between 2028 and 2033.

N9 West Ham

West Ham is a predominantly residential neighbourhood, with four local centres, in the north west of the Borough. Public transport accessibility levels are variable, being highest in the west near Plaistow and Stratford stations.

Policy BFN1 supports incremental change in the N9 West Ham neighbourhood.

Policy N9 aims to achieve growth through moderate uplifts in density in “enhance” areas, expanding Plaistow North Local Centre, and transformation of site allocation NS9.SA1 Plaistow North which is a 1.8 hectare vacant site partially within the local centre. Around 320 homes are expected to be built on the allocation during the plan period.

Q4.11 Are policies N9 and N9.SA1 justified and will they be effective in helping to achieve sustainable development in the West Ham neighbourhood? In particular:

- a) The requirement for a pedestrian bridge over the rail tracks onto the southern corner of the site.
- b) The assumption that around 320 homes will be built on N9.SA1 between 2028 and 2033.

N10 Plaistow

Plaistow is a mainly residential neighbourhood in the centre of the Borough. There are two local centres, numerous community facilities and localised industrial and mixed use areas. The neighbourhood generally has good public transport accessibility.

Policy BFN1 supports incremental change in the N10 Plaistow neighbourhood.

Policy N10 aims to achieve growth through moderate uplifts in density in “enhance” areas and development on four site allocations (N10.SA1 to N10.SA4).

N10.SA1 Balaam Leisure Centre is a 0.4 hectare vacant site.

N10.SA2 Newham 6th Form College is a 1.6 hectare site comprising education buildings, a car park and open space.

N10.SA3 Newham Leisure Centre is a 7.7 hectare site including the existing building, car park and outside sports facilities.

N10.SA4 Balaam Street Health Complex is a 0.4 hectare site comprising an existing health centre complex.

A total of around 440 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.12 Are policies N10 and N10.SA1 to N10.SA4 justified and will they be effective in helping to achieve sustainable development in the Plaistow neighbourhood? In particular:

- a) The assumption that around 40 homes will be built on N10.SA1 between 2033 and 2038.
- b) The assumption that around 200 homes will be built on N10.SA2 between 2028 and 2033.
- c) The assumption that around 140 homes will be built on N10.SA3 between 2033 and 2038.
- d) The assumption that around 50 homes will be built on N10.SA4 between 2028 and 2033.

N11 Beckton

Beckton neighbourhood and includes late 20th century residential areas, a district centre, out of town retail parks, industrial areas designated as SIL, and a network of open spaces. Public transport accessibility is low in much of the area, being highest in the east towards Beckton and Gallions Reach DLR stations.

Policy BFN1 supports incremental change in the N11 Beckton neighbourhood.

Policy N11 aims to achieve growth through a moderate uplift in density in “enhance” areas, intensified use of retail parks and industrial areas, and development on three site allocations (N11.SA1 to N11.SA3).

N11.SA1 East Beckton Town Centre covers 5.4 hectares including the primary shopping area, car parks and community facilities.

N11.SA2 Cyprus is 1 hectare of inaccessible greenspace.

N11.SA3 Alpine Way is a 5.3 hectare site comprising an existing retail park.

A total of around 2,080 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.13 Are policies N11 and N11.SA1 to N11.SA3 justified and will they be effective in helping to achieve sustainable development in the Beckton neighbourhood? In particular:

- a) The requirement relating to the layout and design of industrial development on site N11.SA3.
- b) The requirement in N11 part 12 relating to mitigating odour impacts from Beckton sewage treatment works in relation to allocation N11.SA3.
- c) The assumption that around 1,160 homes will be built on N11.SA1 between 2028 and 2038.
- d) The assumption that around 215 homes will be built on N11.SA2 between 2027 and 2028.

- e) The assumption that around 700 homes will be built on N11.SA3 between 2028 and 2038.

N12 East Ham South

East Ham South is a predominantly residential neighbourhood with two local centres and varied levels of public transport accessibility.

Policy BFN1 supports incremental change in the N12 East Ham South neighbourhood.

Policy N12 supports a moderate uplift in density in “enhance” areas. There are no site allocations in the neighbourhood.

Q4.14 Is policy N12 justified and will it be effective in helping to achieve sustainable development in the East Ham South neighbourhood?

N13 East Ham

East Ham is a predominantly residential neighbourhood with a Major Town Centre and varied levels of public transport accessibility.

Policy BFN1 supports incremental change in the N13 East Ham neighbourhood.

Policy N13 supports a moderate uplift in density in “enhance” areas and development of three site allocations (N13.SA1 to N13.SA3).

N13.SA1 East Ham Western Gateway is a 0.7 hectare site including community facilities, retail, residential and car parking.

N13.SA2 East Ham Primark is a 0.5 hectare site comprising an existing retail store and service yard.

N13.SA3 Former East Ham Gasworks is a 10.3 hectare site including former gasholders and open space including a disused sports pitch currently inaccessible to the public.

A total of around 470 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.15 Are policies N13 and N13.SA1 to N13.SA3 justified and will they be effective in helping to achieve sustainable development in the East Ham neighbourhood? In particular:

- a) Whether up to date, adequate evidence demonstrates that site N13.SA3 passes the sequential and exceptions test and the policy requirements will ensure that the development proposed will be safe from flooding for its lifetime.
- b) The assumption that around 140 homes will be built on N13.SA1 between 2033 and 2038.
- c) The assumption that around 85 homes will be built on N13.SA2 between 2028 and 2033.
- d) The assumption that around 250 homes will be built on N13.SA3 between 2028 and 2038.

N14 Green Street

Green Street is a predominantly residential neighbourhood in the centre of the Borough with a District Centre and moderate levels of public transport accessibility.

Policy BFN1 supports incremental change in the N14 Green Street neighbourhood.

Policy N14 supports a moderate uplift in density in “enhance” areas and development of one site allocation N14.SA1 Shrewsbury Road health complex which is a 0.73 hectare site expected to deliver around 40 homes by the end of the plan period.

Q4.16 Are policies N14 and N14.SA1 justified and will they be effective in helping to achieve sustainable development in the Green Street neighbourhood? In particular, the assumption that around 40 homes will be built on N14.SA1 between 2028 and 2033.

N15 Forest Gate

Forest Gate is a predominantly residential neighbourhood in the north of the Borough with a District Centre and moderate levels of public transport accessibility.

Policy BFN1 supports incremental change in the N15 Forest Gate neighbourhood.

Policy N15 supports a moderate uplift in density in “enhance” areas and development of two site allocations (N15.SA1 and N15.SA2).

N15.SA1 Lord Lister Health Centre is 0.2 hectare site comprising the existing community facility.

N15.SA2 Woodgrange Road West is a 0.5 hectare site including retail, residential and community uses and a postal sorting office.

A total of around 190 homes are expected to be built on the allocations in the neighbourhood during the plan period.

Q4.17 Are policies N15, N15.SA1 and N15.SA2 justified and will they be effective in helping to achieve sustainable development in the Forest Gate neighbourhood? In particular:

- a) The assumption that around 40 homes will be built on N15.SA1 between 2028 and 2033.
- b) The assumption that around 160 homes will be built on N15.SA2 between 2025 and 2038.

N16 Manor Park and Little Ilford

The Manor Park and Little Ilford neighbourhood in the north east of the Borough is predominantly residential with a local centre and varied levels of public transport accessibility.

Policy BFN1 supports incremental change in the N16 Manor Park and Little Ilford neighbourhood.

Policy N16 supports a moderate uplift in density in “enhance” areas, improved retail and leisure offer in the primary shopping area, and new and intensified development in existing industrial areas. There are no site allocations.

Q4.18 Is policy N16 justified and will it be effective in helping to achieve sustainable development in the Manor Park and Little Ilford neighbourhood?

M5. Housing land supply

This matter considers the housing land supply over the plan period, and for the five years following adoption.

The housing land supply assumptions in the submitted Plan relate to a base date of 1 April 2023.

However, the Council’s response to PQ27 advises that it expects to publish updated housing land supply evidence relating to 1 April 2025 by 21 November 2025. I will publish further questions relating to this matter when I have considered that updated evidence (see below).

Housing supply for the plan period 2023 to 2038

Policy H1 indicates that the housing requirement (51,425 to 53,784 homes) will be met through:

- Majority of new homes being on site allocations
- Optimisation of housing delivery on small sites (<0.25 hectares)
- Windfalls

The Council’s response to PQ23 advises that the following number of new homes are expected from the following sources between 2023 and 2038:

• Allocations	38,094
• Small sites	5,700
• Windfalls	3,270
• Permissions (and resolutions to grant)*	6,720
• Total	53,784

* On sites not allocated in the Plan.

The following question is about the principle of clarifying the housing land supply assumed in the Plan, irrespective of the actual figures.

Q5.1 Does the Plan need to be modified to clarify the contributions from different sources of land supply that are expected to meet the housing requirement (irrespective of what the figures for each of those sources are)?

Site allocations

The Council's response to PQ24 advises that the Plan allocates every site that it considers to be suitable and available for development and assumes that the number of homes built on the allocations will be optimised as explained in the Site Allocations and Housing Trajectory Methodology 2025³⁷.

However, the submitted Plan does not identify how many homes it assumes will be built on each site or include a housing trajectory illustrating the expected rate of housing delivery over the plan period as referred to in NPPF 75.

The response to PQ24 explains that the capacity modelling and figures for each allocation are not included in the Plan because it represents one way of optimising the capacity of a site, whereas the exact scale of housing development will depend on further detailed design work through the planning application process. The response goes on to provide the capacity figures for the allocations (that collectively are assumed to contribute a total of 38,094 homes) and a housing trajectory for each allocation (based on the information available when the Plan was prepared).

The Council's Site Capacity Testing Summary Report published on 30 September 2025 provides information upon which the capacity and trajectory for each allocation is based³⁸.

I considered the site allocations in the Plan, including the capacity assumptions based on the information available when the Plan was prepared, under matter 4.

Q5.2 If the plan period were to be extended to 2042, which of the site allocations would have increased total capacity as a result of development continuing after 2038?

If I have any further questions about the capacities and trajectories for the site allocations when I have considered the Council's updated housing land supply information relating to 1 April 2025 I will publish these after 21 November 2025.

The following question is about the principle of modifying the Plan to include indicative capacities for site allocations, irrespective of the actual figures for each.

Q5.3 Does the Plan need to be modified to include indicative capacities (numbers of homes) for each site allocation, along with an explanation of how they have been calculated and that they are subject to detailed design through masterplanning and planning application processes?

Windfalls

National policy states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

³⁷ EB058.

³⁸ ED003.

The Council's response to SPQ23.1(a) clarifies that the Plan includes a total windfall allowance of 8,970 for the period 2023 to 2038 (5,700 small site allowance plus 3,270 other windfalls). That represents an average windfall allowance of 598 per year³⁹.

The Council's responses to SPQ23.1(b) and (c) provide the following figures for completions on small sites and other windfalls between 2014 and 2024:

	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	23/24	24/25
Small	146	527	566	314	335	213	156	297	158	474
Other	350	1062	30	22	125	192	481	194	9	155

Those figures indicate that the average completion rate on small sites was 319 homes per year and on other windfalls 262 homes per year. In other words, total windfalls averaged 581 homes per year between 2014 and 2024.

Q5.4 Are the assumptions in the Plan about small site and other windfalls justified and consistent with national policy?

Q5.5 If the plan period were to be extended to 2042, how, if at all, should the small site and windfall allowances be modified?

Sites with planning permission or resolution to grant for residential development

The Council's response to PQ23 advises that a total of 6,720 new homes are expected to be built between 2023 and 2038 on sites that had planning permission or a resolution to grant on 1 April 2023.

Q5.6 Are the assumptions in the Plan about the contribution from sites with planning permission, or a resolution to grant permission, to meeting the housing requirement over the plan period justified? In particular, should a lapse rate be applied?

Q5.7 If the plan period were to be extended to 2042, which, if any, of the sites with planning permission or resolution to grant would have increased total capacity as a result of development continuing after 2038?

I may publish further questions about the housing land supply from sites with planning permission, or a resolution to grant permission, over the plan period when I have considered the updated and additional information from the Council after 21 November 2025.

Five year requirement 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).

³⁹ 8,970 / 15 = 598.

The Council's response to PQ28 advises that the relevant 5 year period is 1 April 2027 to 31 March 2032.

The Council's response to PQ29 advises that, based on the housing requirement in the Plan (51,425 homes) and stepped trajectory, the requirement for that five year period (including a 20% buffer) is 21,982 homes.

Q5.8 (a) Is the relevant period for considering five year supply following the intended date of adoption 1 April 2027 to 31 March 2032? (b) Based on the housing requirement in the Plan (51,425 homes) and stepped trajectory, is the requirement for that five year period (including an appropriate buffer) 21,982 homes?

Five year supply following adoption

The Council's responses to PQ30 and SPQ30.1 advise that, based on the evidence that informed the housing figures in the submitted Plan, the capacity of specific, deliverable sites for the period 1 April 2027 to 31 March 2032 is 18,642 homes, including a small site allowance of 1,900 (380 homes per year). The supply for that period comprises:

• Allocations	15,565
• Small sites	1,900
• Other windfalls	0
• Permissions (and resolutions to grant)*	1,177
• Total	18,642

* On sites not allocated in the Plan.

The site allocation trajectories provided in response to PQ24 indicate that the vast majority of allocations are expected to contribute to meeting the five year requirement following adoption (which includes the last year of "short term" and the first four years of "medium term" as defined in the submitted Plan).

The Council's response to PQ27 advises that it expects to publish updated, comprehensive housing land supply information relating to a base date of 1 April 2025 by 21 November 2025. I have asked the Council to provide the following when that information is available⁴⁰:

A list of all of the sites that are assumed to contribute to the five year supply between 1 April 2027 and 31 March 2032 (based on the updated evidence relating to 1 April 2025) in the following categories with the number of homes expected to be completed on each site in each year of that period:

- Sites with detailed planning permission.
- Sites with outline planning permission for fewer than 10 homes.
- Sites with outline planning permission for 10 or more homes.
- Sites with a grant of permission in principle.
- Allocations in the Plan that do not fall into any of the above categories.

⁴⁰ IN2.2 SPQ30.2 and SPQ30.3 (1 October 2025).

A summary of the trajectory and relevant evidence based on the definitions of “deliverable” and “developable” in national policy and guidance using a standard template for:

- Every allocation in the Plan (that proposes residential development); and
- All other sites that are not allocations in the plan but are assumed to contribute towards the five year supply in the period 2027 to 2032.

I will publish questions about five year housing land supply when I have considered the updated and additional information from the Council after 21 November 2025.

M6. Housing development management policies

H2 Protecting and improving existing housing

Policy H2 states that all residential housing will be protected unless replaced with at least an equivalent level of overall residential floorspace.

Q6.1 Is policy H2 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for affordable, family and specialist housing?

H3 Affordable housing

The Council's response to PQ41 advises that the definitions of affordable housing affordable home ownership, and affordable rent housing differ from those in the NPPF but are in conformity with the London Plan.

The GLA's letter dated 30 August 2024 indicates that the approach to affordable housing in policy H3 is part of the reason why the Mayor considers that the Plan is not in general conformity with the London Plan. The concerns relate to the threshold being set at 60% and the tenure split between social rent (83%) and affordable home ownership (17%) which the Mayor considers will lead to fewer affordable homes being built in Newham than if the approach set out in London Plan policies H4 to H7 were applied.

The Council's response to PQ7 advises that policy H3 is justified by evidence relating to need, that it expects viability to improve over time, and that the policy allows for viability assessments to be submitted in support of planning applications that do not achieve the targets. The response also suggests that London Plan policy H5 part C3 allows for planning applications to follow the fast track route if they meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant.

Q6.2 Is policy H3 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for affordable homes? In particular:

- a) The requirement for proposals for ten or more homes to provide 50% of the total as social rent housing and 10% affordable ownership housing (unless a financial viability assessment demonstrates that the maximum viable mix will be delivered).
- b) The definitions of affordable housing, affordable home ownership, and affordable rent housing.

H4 Housing mix

Policy H4 states that all new residential developments should deliver a mix and balance of residential types and sizes.

Q6.3 Is policy H4 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for different types of housing? In particular:

The requirements for proposals for ten or more homes to deliver:

- a) 40% of the total as family housing with three or more bedrooms (unless a financial viability assessment demonstrates that the maximum viable mix will be delivered).
- b) No more than 15% of the total to be one bedroom, two person homes and no more than 5% of the total to be studio or one person homes.

And (c), the requirement for proposals on site allocations to provide at least 5% of homes as four or more bedroom family housing.

H5 Build to Rent housing

Build to Rent housing is purpose built housing designed for rent (rather than sale). Recent years have seen a significant increase in the private rented sector in the Borough⁴¹.

Q6.4 Is policy H5 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for rented housing? In particular:

- a) Are the criteria for defining Build to Rent set out in part 1 consistent with national guidance⁴² and London Plan policy H11?
- b) The requirements in parts 2, 3 and 4 relating to the provision of affordable housing in Build to Rent schemes.

H6 Supported and specialist housing

Policy H6 relates to proposals affecting existing specialist housing, and to proposals for new or expanded specialist housing.

Q6.5 Is policy H6 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for specialist housing?

H7 Specialist housing for older people

Policy H7 supports the provision of specialist housing for older people including sheltered housing, extra care/assisted living, and care homes.

Q6.6 Is policy H7 justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for specialist housing for older people? In particular:

- a) The locational requirements in part 1(b).
- b) The requirement in part 1(c) to provide affordable housing in accordance with policy H3 (other than in care home schemes).

⁴¹ Plan 3.183.

⁴² PPG ID:60 (2018).

H8 Purpose built student accommodation

In recent years, Newham has seen high levels of student accommodation permitted, particularly within Stratford and Maryland where over 3,600 bed spaces have been permitted or completed between 2019 and 2024. This equates to 10% of the identified need for purpose built student accommodation in London between 2019 and 2029, whereas Newham's local need for such accommodation represents only 4% of the annual need in London. Policy H8 therefore only allows the development of additional student accommodation in the borough in certain defined circumstances⁴³.

Q6.7 Is policy H8 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for purpose built student accommodation in appropriate locations? In particular:

- a) The requirements in part 1 relating to proposals in the Stratford and Maryland neighbourhood.
- b) The requirements in part 2 relating to proposals elsewhere in the borough.
- c) The requirement in part 3 for at least 60% affordable housing.
- d) The requirements in part 4 relating to nomination agreements.
- e) The requirement in part 5 for the provision of ancillary communal space and sporting facilities.

H9 Houses in multiple occupation and large-scale purpose built shared living

Policy H9 seeks to ensure that shared accommodation (for which there is growing demand, including from students) is delivered in suitable locations, is neighbourly and contributes to the supply of affordable accommodation within the borough⁴⁴.

Q6.8 Is policy H9 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for shared accommodation in appropriate locations? In particular:

- a) The requirements in part 3 making provision for affordable homes.
- b) The locational requirements in part 4.
- c) The requirement relating to the inclusion of main town centre uses and community facilities in part 6.

H11 Housing design quality

Policy H11 aims to ensure that housing developments are designed for long term comfort and flexibility, and ease of maintenance⁴⁵.

Q5.9 Is policy H11 justified, consistent with the London Plan and will it be effective in helping to achieve high quality, sustainable homes? In particular:

- a) The requirements in part 2(c) and (d) relating to dual-aspect general needs housing.
- b) The requirement in part 2(e) for any ground floor private amenity space to be located away from street-facing facades.

⁴³ Plan 3.188.

⁴⁴ Plan 3.191.

⁴⁵ Plan 3.197.

- c) The design requirements and standards for specialist and other non-general needs housing in part 3.
- d) The requirements in part 5 for shared amenity spaces, including play provision, in major residential developments.
- e) The requirement in part 7 relating to the building regulation standards M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings.

M7. 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 11-15⁴⁶.

The Gypsy and Traveller Accommodation Assessment (ORS, May 2022)⁴⁷ indicates that there is one traveller site in Newham, which is publicly owned, and identifies a need for a total of 23 additional 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 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 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 additional 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".

The Council's responses to PQ32 to PQ36 advise that:

⁴⁶ PPTS paragraphs 7, 9 and 10.

⁴⁷ EB057.

- The assessment of need (23 pitches) remains up to date because it was primarily derived from detailed surveys with existing residents of pitches in the borough and therefore the previously assumed demographic growth will not have changed significantly since 2022.
- The assessment of need is relevant to the PPTS 2024 definition of Gypsy and Traveller because the GTAA sought to capture need for accommodation for people outside of the 2015 PPTS definition.
- The GLA's assessment of need for Gypsy and Traveller accommodation across London is expected to be published in Autumn/Winter 2025.
- The Plan does not include any allocations for additional pitches because no deliverable sites have been identified (lack of landowner interest).
- The existing site that is safeguarded in the Plan (which has 15 pitches) could be extended to provide two new pitches.
- The Council is continuing to work to identify deliverable sites, including through assessing Council-owned small sites (which is an ongoing process following a corporate remit in May 2025)
- No additional pitches have been created or granted planning permission since the GTAA was carried out.

Q7.1. Is policy H10 justified and will it be effective? In particular:

- a) Is the assessment of need (23 additional pitches in the period 2022 to 2038) based on robust, up to date evidence?
- b) Will the proposed support for developments that include accommodation that meet the specified criteria be effective in ensuring that the need for additional pitches can be met, despite the lack of allocations?

M8. Economy

Newham is a strategically important economic location in London and has an important employment land resource. The four J policies in the Plan direct growth across the borough to areas which have the greatest economic potential⁴⁸.

The Plan's Glossary defines "employment use" as:

- Offices E(g)(i)
- Research and development E(g)(ii)
- Light industrial E(g)(iii)
- General industrial B2
- Storage or distribution B8 (including micro fulfilment and dark kitchen/shop)
- Industrial related sui generis uses (including waste, utilities including digital/data and transport depots)

The Plan's Glossary defines "industrial use" as:

- Light industrial E(g)(iii)
- General industrial B2

⁴⁸ Plan 3.149.

- Storage or distribution B8 (including micro fulfilment and dark kitchen/shop)
- Industrial related sui generis uses (including waste, utilities including digital/data and transport depots)

All my references to “employment” and “industrial” relate to those definitions (unless otherwise specified)⁴⁹.

J1 Employment and growth and J2 New employment floorspace

Locations and uses

Policy J1 parts 2(a) and (b) state that the development of industrial floorspace (and research and development E(g)(ii) uses) should be located on:

- Strategic Industrial Locations (SIL) or Local Industrial Locations (LIL) which are listed in Tables 6 and 7, indicated on a map in the Plan, and designated on the policies map.
- Retail and leisure parks with good accessibility to the strategic road network.

Policy J1 part 2(c) supports the following employment uses in Local Mixed Use Areas which are listed in Table 8, indicated on a map in the Plan, and designated on the policies map:

- Offices E(g)(i)
- Research and development E(g)(ii)
- Light industrial E(g)(iii)
- Storage or distribution B8

Policy J1 part 2(d) supports the following uses as part of employment led development in Micro Business Opportunity Areas which are listed in Table 9 indicated on a map in the Plan, and designated on the policies map:

- Offices E(g)(i)
- Research and development E(g)(ii)
- Light industrial E(g)(iii)

Policy J1 part 2(e) protects and supports office E(g)(i) floorspace in town centres as set out in Table 10 and in accordance with policies HS1 and HS2. Policy J2 part 4 states that all standalone office developments outside town centres will be subject to a sequential test and, for developments of more than 300 sqm, an impact assessment.

Policy J1 part 2(f) states that certain employment uses will be supported on site allocations identified for mixed use or employment led development.

Policy J2 part 3 supports new employment floorspace outside the locations identified in policy J1 if one of three stated criteria are met.

⁴⁹ For succinctness, my further references to B8, and industrial related sui generis, do not repeat the references to micro fulfilment and dark kitchen/shop, or waste, utilities including digital/data and transport depots.

Q8.1 Is the locational approach to the different types of employment uses set out in policy J1 parts 2(a) to 2(f) and J2 part 3 justified and consistent with the London Plan and will it be effective in helping to meet the identified needs for different types of employment floorspace?

Intensification of SIL and LIL

Policy J2 part 1 states that all developments on SIL and LIL must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification format. Implementation box J2.1 refers to all industrial developments being expected to explore the scope for multi-deck as a priority followed by other formats (including, but not limited to, stacked units, higher plot ratios, or more intensive internal arrangements where appropriate).

It is not clear whether the requirement is intended to apply to other employment uses in addition to those defined as “industrial”.

Q8.2 Is the requirement for all industrial development on SIL and LIL to intensify the site use to deliver a net increase in industrial floorspace justified, consistent with the London Plan and will it be effective in allowing all businesses to grow and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances?

Co-location of employment and residential uses

Policy J2 part 2 states that co-location with residential development is only supported in the specific Local Mixed Use Areas and Micro Business Opportunity Areas identified in Tables 8 and 9 and on specific site allocations (which are listed in implementation box J2.2), and provided that three specified criteria are met.

It is not clear if the requirement is intended to apply to all employment uses or only those defined as “industrial”.

Uses falling with class E(g) are, by definition, those that can be carried out in any residential area without detriment to the amenity of that area.

Q8.3 Is the restriction on the co-location of employment and residential uses outside the specified areas and site allocations justified, consistent with the London Plan and will it be effective in helping to meet the identified needs for housing and employment developments?

Micro Business Opportunity Areas

Q8.4 Is the requirement in policy J2 part 5 for office, research and development, and light industrial developments in Micro Business Opportunity Areas to support workspaces for no more than ten employees justified and consistent with the London Plan?

Economic Strategies to support development proposals

Policy J1 part 3 requires all major developments incorporating employment floorspace to submit an Economic Strategy that details:

- a. how the proposed floorspace responds to the latest demand evidence and Newham's economic objectives; and
- b. market testing for the proposed type, scale and tenure of employment floorspace; and
- c. a phasing strategy for employment floorspace to maximise occupancy.

Q8.5 Is the requirement in policy J1 part 3 for all major developments incorporating employment floorspace to submit an Economic Strategy justified and consistent with the London Plan?

J3 Protecting employment floorspace

Policy J3 parts 1, 2, 3 and 5 seek to ensure that development does not lead to net loss of employment floorspace or yardspace on SIL, LIL, Local Mixed Use Areas, Micro Business Opportunity Areas or elsewhere unless certain specified criteria are met, including in relation to relocation of existing businesses. Part 4 requires development on relevant allocations to re-provide suitable floorspace for any existing businesses on the site or provide a suitable and robust relocation strategy.

Q8.6 Are the requirements relating to no net loss on employment floorspace and relocation in policy J3 justified, consistent with the London Plan and will they be effective in supporting economic development?

J4 Delivering Community Wealth Building and Inclusive Growth

Policy J4 seeks to tackle inequality and ensure that everyone, regardless of skills, experience or background, can meaningfully share and take an active part in Newham's economy.

Q8.7 Are the requirements of policy J4 justified and consistent with the London Plan and national policy and legislation relating to planning conditions and obligations? In particular:

- a) The requirement in part 1(b) for all developers proposing employment floorspace to work with the Council's recognised employment and training broker and/or education providers to maximise economic and training opportunities and improve skills.
- b) The requirement in part 1(c) for all major developments to provide a tariff-based contribution and an Employment Strategy which secures 35 per cent construction phase (all major developments) and 50 per cent end-user phase jobs (for all developments delivering employment floorspace) for Newham residents.
- c) The requirement in part 3 for all developers to "commit to supporting" certain specified outcomes.
- d) Whether part 4 is intended to require the provision of affordable workspace (rather than support proposals if the three stated criteria are met).

Office and industrial floorspace supply

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 (90,000 sqm).

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 (335,000 sqm). The industrial floorspace supply comprises:

- 23,820 sqm on sites with permission
- 95,500 sqm on sites with “industrial potential in planning”⁵⁰
- 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 SIL and LIL must intensify site use to deliver a net increase in industrial floorspace through the most appropriate intensification format. The Council’s response to PQ40 lists the areas of SIL and LIL that are identified as having potential for intensification to accommodate an additional 471,265 sqm of floorspace.

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.

Q8.8 Will policies J1 to J3 be effective in helping to meet the identified need for additional industrial floorspace over the plan period (335,000 sqm) primarily through the intensification of existing uses?

M9. Town centres

The following issues and questions relate to policies HS1 to HS8 and the overall approach to the development of main town centre uses.

Town centre network

Newham has six existing town centres: Stratford, East Ham, Green Street, Forest Gate, Canning Town and East Beckton along with numerous smaller local centres and neighbourhood parades all of which are listed in Table 3 and designated on the policies map. There are also two large scale retail parks in the Beckton and Gallions Reach neighbourhoods.

The Council’s response to PQ41 advises that the Plan’s definition of town centres differs from that in the NPPF but is in conformity with the London Plan. The Plan’s Glossary includes definitions of “town centre” and “town centre network”.

⁵⁰ Council response to PQ39 advises that there are two sites with industrial potential in planning: Albert Island (LIL) and G-Park (SIL).

Q9.1 Is the definition of town centre used in the Plan clear and is it justified? In particular, is the inclusion of neighbourhood parades in the town centre network consistent with national policy and/or the London Plan?

Q9.2 (a) Is the existing town centre network of metropolitan, major, district and local centres defined in policy HS1 Table 3 justified and consistent with the London Plan? (b) Is the geographical extent of each existing centre and, where relevant, the primary shopping area and frontages justified?

Q9.3 Are the changes to the existing town centre network proposed in policy HS1 justified, consistent with the London Plan and will they be effective in helping to meet identified needs for additional floorspace for main town centre uses? In particular:

- Transformation of Stratford from a metropolitan centre to an international centre (referred to in Table 3).
- Creation of a new district town centre through re-configuring and capitalising on the trade draw of Gallions Reach Shopping Centre⁵¹.
- Creation of four new local centres and expansion of three local centres on the site allocations specified in policy HS1 part 1(e).

Policy HS1 part 1 – new homes in relation to designated centres and parades

Policy HS1 part 1 states that all new homes should be within a maximum 400 metre radius of at least one designated centre or parade, or be within a 15 minutes walking distance of at least two designated centres or parades.

The Council's response to FPQ2 advises that the intention of that policy is to direct the location of main town centre uses so that the objective of all new homes being within those distances of town centres or parades is achieved (rather than prevent the building of new homes in certain parts of the borough).

The response advises that maps showing the relevant designated centres and parades along with the specified radii / distances from each are included in Appendix 5 of the Town Centres Network Review Methodology Paper Update 2024⁵². It goes on to advise that the maps indicate that, once the full network is delivered, there will only be three parts of the borough that are beyond 15 minutes walking distance of at least two designated centres or parades:

- MOL land in the east of the borough
- Beckton STW and industrial land at Jenkins Lane
- Existing houses north of Forest Gate town centre

Q9.4 Does policy HS1 and/or the reasoned justification need to be modified to clarify that it is not intended to prevent new homes being built in parts of the borough, but to direct the location of main town centre uses?

Requirements for development within town and local centres

⁵¹ This issue is covered in detail under matter 4 N17 Gallions Reach neighbourhood and N17.SA1 Beckton Riverside.

⁵² EB034.

Q9.5 Are the development requirements in policies HS1 and HS2 relating to development in town and local centres justified and consistent with national policy? In particular:

- a) The requirement in HS1 part 3 for development in new and expanded local centres to result in at least 20 non-residential units, the majority of between 80 sqm and 150 sqm floorspace, and continuous shopfront frontages in the primary shopping area.
- b) The requirement in HS1 part 4 for developments in neighbourhood parades (or new non-designated small scale shopfront unit groupings) to result in between five and ten non-residential units, each with floorspace between 80 sqm and 150 sqm, and for impact assessments for proposals resulting in more than 1,000 sqm floorspace.
- c) The requirements in HS2 part 2 relating to % of, and loss of, units in E class uses in primary shopping areas.
- d) The requirement in HS2 part 6 for developments proposing a net total of 1,000 sqm or more floorspace to deliver at least 10% of floorspace as E class uses in units of 80 to 150 sqm that will be marketed and maintained at discounted rent.
- e) The requirement in HS2 part 7 for proposals in town and local centres for 2,500 sqm or more floorspace in any main town centre uses to submit a marketing strategy demonstrating market demand for the type and range of units and uses proposed

Edge of centre and out of centre development

Q9.6 Are the requirements in policy HS3 relating to development outside town and local centres justified and consistent with national policy? In particular:

- a) The requirements in part 2 for a sequential test for proposals for new or retention, re-provision, or intensification of retail (Ea), restaurants and cafes (Eb) and services (Ec) uses.
- b) The requirement in part 3 for an impact assessment for proposals over 300 sqm floorspace for retail (Ea) and restaurants and cafes (Eb).
- c) The restriction on use classes in part 4 (which Implementation box HS3.4 states will be achieved by use of planning conditions).

Markets and events / pop-up spaces

Q9.7 Is policy HS4 relating to markets and events / pop-up spaces justified and consistent with national policy and the London Plan?

Visitor evening and night time economy

Q9.8 Are the roles of the different town centres proposed in policy HS5 and Table 4, and the “less prominent” role for local centres proposed in part 3, justified, consistent with the London Plan and will they be effective in supporting the visitor evening and night time economy?

Health and wellbeing on the High Street

Q9.9 Is policy HS6 relating to health and wellbeing on the High Street justified and consistent with the London Plan? In particular:

- a) The spatial restrictions on gambling premises and hot food takeaways in part 1.

- b) The requirement for operators to comply with various standards set out in parts 2, 3 and 4.

Delivery-led businesses

Q9.10 Are the requirements in policy HS7 relating to proposals for dark kitchens / dark shops and micro fulfilment centres justified, consistent with the London Plan and effective?

Visitor accommodation

Q9.11 Is policy HS8 relating to hotels and other forms of visitor accommodation justified and consistent with national policy and the London Plan?

Retail and leisure floorspace supply

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.

The Council's response to PQ38 explains that the neighbourhoods policies, together with policies HS1 and HS2, support delivery of convenience retail floorspace across the network of town and local centres to meet local needs. The 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 Sites Capacity Testing Summary Report⁵³ includes schedules that indicate which uses have been modelled in each site allocation and their cumulative floorspace. 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.

Q9.12 Will the Plan be effective in ensuring that the need for additional retail and leisure floorspace can be met in a way that is consistent with the London Plan and national policy?

M10. Design

This matter considers policies BFN2, D1, D2 and D5 to D9. Policies D3 and D4 were considered under matter 3 (spatial strategy).

BFN2 Co-designed masterplanning

⁵³ ED003.

Q10.1 Is policy BFN2 justified and consistent with national policy and the London Plan? In particular:

- a) The requirement for a Meanwhile Use Strategy in part 4.
- b) The requirement for post occupancy surveys in part 5.

D1 Design standards

Q10.2 Is policy D1 justified and consistent with national policy and the London Plan? In particular:

- a) The reference to “Council-led” design guidance in part 1(a)
- b) The requirement for major developments to achieve Secured by Design Silver Award in part 3.
- c) The requirements relating to temporary buildings in part 4.
- d) The requirement for certain applications to be assessed by the Newham Design Panel and any community and/or youth design review panel appointed by the Council in part 4.

D2 Public realm net gain

Q10.3 Is policy D2 justified and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 3 for major developments referable to the Mayor to make proportionate contributions towards public realm enhancement and maintenance beyond the site.
- b) The requirement in part 5 for a Public Realm Management Plans.

D5 Shopfronts and advertising

Q10.4 Is policy D5 justified and consistent with national policy?

D6 Neighbourliness

Q10.5 Is policy D6 justified and consistent with national policy and the London Plan? In particular, the requirement for developments to seek compliance with the best practice standards and guidance set out in Table 2.

D7, D8 and D9 Designated and non-designated heritage assets

Policies D7, D8 and D9 relate to conservation areas, areas of townscape value, archaeological priority areas, and other designated and non-designated heritage assets.

Q10.6 Are policies D7, D8 and D9 justified and consistent with national policy and relevant legislation relating to heritage assets? In particular:

- a) Are the areas of townscape value listed in implementation box D7.2, illustrated on a map in the Plan and designated on the policies map justified?
- b) The reference in D7 part 3 to the loss of characteristics which contribute to the significance of conservation areas and areas of townscape value not being supported, without any reference to weighing any public benefits against the level of harm.
- c) Are the archaeological priority areas listed in implementation box D8.1, illustrated on a map in the Plan and designated on the policies map justified?

M11. Climate change

CE1 Environmental design and delivery

Q11.1 Is policy CE1 justified and consistent with national policy and the London Plan?

CE2 Zero carbon development

Q11.2 Is policy CE2 justified and consistent with national policy and the London Plan? In particular:

- a) Are the space heating demand standards in part 1 consistent with the written ministerial statement on local energy efficiency standards published on 13 December 2023 (WMS) having regard to viability and the way in which the standards are expressed (KWh/m²/yr)⁵⁴?
- b) Are the energy efficiency standards in part 3 consistent with the WMS having regard to viability and the way in which the targets are expressed (KWh/m²/yr)?
- c) The requirement in part 2 for development to not use fossil fuels.
- d) The requirements in part 4 to generate energy efficiency on site to specified standards.
- e) The requirements in part 5 relating to demonstrating operational performance.
- f) The effect of the requirements on energy intensive industries.

CE3 Embodied carbon and the circular economy

Q11.3 Is policy CE3 justified and consistent with national policy and the London Plan? In particular, the requirement for major developments to meet embodied carbon limits of less than 500kg/CO₂/m²?

CE4 Overheating

Building Regulation part O means that new residential buildings should be designed to reduce overheating. As this is mandatory, the Government does not expect local plan policies to duplicate the requirement⁵⁵.

Q11.4 Is policy CE4 justified and consistent with national policy and the London Plan? In particular:

- a) The requirements in parts 1 (a) and (b) for proposals for residential developers to submit a “Good Homes Alliance Early Stage Overheating Risk Tool” and to undertake overheating modelling in certain circumstances.
- b) The requirement in part 3 for applicants to submit proof of ability to meet a Building Regulation part O.

CE5 Retrofit and the circular economy

Q11.5 Is policy CE5 justified and consistent with national policy and the London Plan?

⁵⁴ Statement UIN HCWS123 13 December 2023.

⁵⁵ Statement UIN HCWS495 15 December 2021.

CE6 Air quality

Q11.6 Is policy CE6 justified and consistent with national policy and the London Plan and will it be effective? In particular, the requirement in part 2 for development along major roads or in other locations that experience poor air quality that cannot be mitigated through local measures to improve the dispersal of identified pollutants and reduce exposure to poor air quality.

CE7 Managing flood risk

Q11.7 Is policy CE7 justified and consistent with national policy and the London Plan? In particular:

- a) The 300 millimetre floor levels referred to in part 2.
- b) The 16 metre and 8 metre set back distances referred to in part 3.
- c) The requirement in part 4 for development to confirm that defence structures are in good condition and will provide protection for the lifetime of the development.

CE8 Sustainable drainage

Q11.8 Is policy CE8 justified and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 2(b) for site allocations in the N1 North Woolwich, N2 Royal Victoria, N3 Royal Albert North N4 Canning Town, N5 Custom House, N6 Manor Road and N17 Gallions Reach Neighbourhoods to implement blue-green infrastructure runoff reduction interventions or Sustainable Urban Drainage systems on 50% or more of the site area.
- b) The requirement in part 4 for major development and any new development falling within a Critical Drainage Area to reduce surface water run-off to greenfield run-off rates.

M12. Green and water spaces

GWS1 Green spaces

The implementation box to policy GWS states that green space includes all vegetated open space of public value irrespective of whether they are accessible to the public (including spaces not designated on the policies map).

Q12.1 Is policy GWS1 justified and consistent with national policy and the London Plan? In particular:

- a) Is the designation of each green space included on the policies map justified?
- b) Are the areas of Green Belt designated on the policies map consistent with the London Plan?
- c) Are the areas of Metropolitan Open Land designated on the policies map consistent with the London Plan?
- d) Is the application of policy GWS1 to land not designated as green space on the policies map justified and does that represent a clear unambiguous approach?
- e) Is the reference in part 3 to development on green space only being supported in exceptional circumstances justified?

f) Are the requirements in part 5 relating to future maintenance of new green space justified?

GWS2 Water spaces

Q12.2 Is policy GWS2 justified and consistent with national policy and the London Plan? In particular, the requirement in part 2 for development affecting and/or adjacent to water space to improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value.

GWS3 Biodiversity, urban greening and access to nature

The Habitat Regulations Assessment found that the Plan would not have adverse impacts on the integrity of the Epping Forest SAC subject to the mitigation measures that are required by policies in the Plan (including GWS3 part 7).

Natural England agree with the findings of the Habitat Regulations Assessment, subject to a modification to the wording of policy GWS3 part 7 and the associated implementation guidance. The modification would refer specifically to Newham's Epping Forest Special Area of Conservation Recreation Mitigation Strategy which was completed in 2025 (rather than the more general reference to provision of Suitable Alternative Natural Greenspace).

Q12.3 Is policy GWS3 justified and consistent with national policy, the London Plan and relevant legislation? In particular:

- a) Are the Sites of Importance for Nature Conservation designated on the policies map justified?
- b) The requirement in part 3 for development in areas deficient in access to nature to deliver new or improved green or water spaces that would qualify as a Site of Importance for Nature Conservation.
- c) The requirements in part 4 relating to biodiversity net gain.
- d) Do part 7, and the associated implementation guidance, need to be modified to ensure that it is effective in preventing adverse impacts on the integrity of the Epping Forest Special Area of Conservation?

GWS4 Trees and hedgerows

Q12.4 Is policy GWS4 justified and consistent with national policy and the London Plan?

GWS5 Play and informal recreation for all ages

Q12.5 Is policy GWS5 justified and consistent with national policy and the London Plan? In particular, will it be effective in helping to meet the particular needs for recreational space and sports facilities for young people and teenagers?

M13. Social infrastructure

BFN3 Social value and health impact assessments

Q13.1 Is policy BFN3 justified and consistent with national policy and guidance⁵⁶ and the London Plan?

SI1 Existing community facilities and health facilities

Q13.2 Is policy SI1 justified, effective and consistent with national policy and the London Plan? In particular, is the reference in part 2 (that if the loss of a facility can be demonstrated as being acceptable, then the preferred alternative use will be for the maximum viable amount of affordable housing) justified and will it be effective?

SI2 New and improved community facilities and health facilities

Q13.3 Is policy SI2 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 2c for community facilities that have 1,000 sqm or more floorspace or a user appeal beyond the local neighbourhood to be located within a town or local centre (unless part 2d is complied with in the case of main town centre use facilities).
- b) Part 4 which states that speculative social infrastructure development will not be supported.
- c) Whether the policy will provide an effective approach for proposals for large scale places of worship with specific characteristics (including for Islamic education, that reflect the specific accessibility and inclusion needs of women, children, elderly and those with disabilities).

SI3 Cultural facilities and sport and recreation facilities

Q13.4 Is policy SI3 justified, effective and consistent with national policy and the London Plan?

SI4 Education and childcare facilities

Q13.5 Is policy SI4 justified, effective and consistent with national policy and the London Plan? In particular, will it be effective in helping to ensure that the particular educational needs of all sectors of the community can be met?

SI5 Burial space and related facilities

Q13.6 Is policy SI5 justified, effective and consistent with national policy and the London Plan? In particular, will part 2 be effective in helping to meet the need for additional burial space and related facilities?

M14. Transport and infrastructure

This matter considers policies T1 to T5, W5 and BFN4.

T1 Strategic transport

⁵⁶ PPG ID:53

Q14.1 Is policy T1 justified, effective and consistent with national policy and the London Plan?

T2 Local transport

Q14.2 Is policy T2 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 2 for all major developments to provide or contribute to wayfinding, publicly accessible cycle hire provision and car clubs.
- b) Whether the policy will be effective in meeting the needs of people with disabilities, including through the inter-connection of services.

T3 Transport behaviour change

Q14.3 Is policy T3 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 1 for all new development to be car free (apart from the stated exceptions).
- b) The statement in part 2 that development that proposes a drive-through will not be supported.
- c) The requirement in part 4 (f) for all major employment development to include facilities for washing and changing.
- d) The requirement in part 6 (a) for any new development that includes parking to provide EVCP on residential spaces.
- e) The requirement in part 6 (c) for major developments with zero parking on site to provide contributions towards EVCPs in other parts of the borough.
- f) The thresholds for transport assessments in part 7 and Table 15 having regard to national planning guidance⁵⁷.

T4 Servicing and development

Q14.4 Is policy T4 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 4 for all development to be designed to enable and encourage servicing using sustainable means, such as using zero emission vehicles and/or cargo bikes.
- b) The requirement in part 5 for developments that service and/or deliver to other locations to ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for 'last mile' journeys.

T5 Airport

Q14.5 Is policy T5 justified, effective and consistent with national policy and the London Plan? In particular, will it be effective in supporting the operation of London City Airport and its contribution to the wider economy whilst having due regard to social and environmental factors?

⁵⁷ PPG ID:42-013-20140306.

W4 Utilities and digital connectivity infrastructure

Q14.5 Is policy W4 justified, effective and consistent with national policy and the London Plan? In particular:

- a) The requirement in part 1 (b) for all major developments to demonstrate that there is sufficient utility infrastructure capacity both on and off-site to meet the demand of development during the construction and operation phases, taking into consideration the cumulative impact of current and proposed development.
- b) The requirement in part 6 for all major developments to improve digital connectivity.

Policy BFN4 Developer contributions and infrastructure delivery

Q14.6 Is policy BFN4 justified, consistent with national policy and the London Plan, and will it be effective in helping to coordinate the provision of essential new and improved infrastructure with development? In particular:

- a) The prioritisation in part 3 of affordable and family housing; local access to employment and training; and then delivery of required infrastructure?
- b) The approach in part 5 to Vacant Building Credit⁵⁸?

M15. Waste management

The London Plan 2021 sets a target for Newham to manage an apportioned quantity of London's household, commercial and industrial waste: 383,000 tonnes by 2021 and 407,000 tonnes by 2041. The forthcoming update to the adopted Joint East London Waste Plan (2012) will set out which existing waste sites in Newham will be safeguarded to meet this target⁵⁹.

The purpose of policies W1 to W3 is to operate alongside the updated Joint Waste Plan to guide the management of waste in new developments and the operation of waste sites, and help ensure that waste is managed in a sustainable manner, reducing the amount of waste generated and minimising the environmental and amenity impacts of processing waste⁶⁰.

W1 Waste management capacity

Q15.1 Is policy W1 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan? In particular:

- a) The waste sites designated on the policies map
- b) The requirement in part 3 for all existing waste sites to be retained in waste management use.

W2 New or improved waste sites

Q15.2 Is policy W2 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan?

⁵⁸ NPPF 65 and PPG ID: 23b-026 to 028.

⁵⁹ Plan 3.349.

⁶⁰ Plan 3.350.

W3 Waste management in developments

Q15.3 Is policy W3 justified, effective and consistent with national policy, the adopted Joint East London Waste Plan and the London Plan? In particular:

- a) The requirement in part 3 for all major developments on site allocations to provide a well-managed re-use and circular economy room.
- b) The requirement in part 4 for all developments to provide only one waste management solution or technology on site.

M16. Other soundness legal compliance issues

Q16.1 Are there any other soundness or legal compliance issues that have not been addressed under matters 1 to 15?

End of Annex 3