

Newham Draft Local Plan

Site Allocation and Housing Trajectory Methodology Note

December 2022

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1. Introduction

- 1.1. This Site Allocation and Housing Trajectory Methodology Note sets out the methodology used for the identification, assessment and allocation of sites in Section 4 of the draft Newham Local Plan. It sets out how capacity testing was undertaken to inform both the site allocations and the housing trajectory. It also sets out the position on the draft Local Plan housing trajectory and 5 year housing land supply.
- 1.2. This note should be read alongside the site allocations in Section 4 of the Local Plan and Local Plan policy H1.

2. Site Allocation Methodology

2.1. Introduction

2.1.1. This section sets out the methodology used for identifying, assessing and allocating sites in the Draft Local Plan. It provides an overview of the policy context for allocating sites and the assessment undertaken to identify land uses for different sites.

2.2. Policy context

National policy and guidance

2.2.1. The National Planning Policy Framework 2021 (NPPF) requires Local Plans to promote a sustainable pattern of development that seeks to meet the development needs of their area and, as a minimum, provide for objectively assessed needs for housing and other uses. The NPPF (paragraph 20) requires that Local Plan make sufficient provision for:

- housing, employment, retail, leisure and other commercial development;
- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy;
- community facilities, such as health, education and cultural infrastructure;
- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.2.2. With regards to housing the NPPF 2021 requires that the Local Plan should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address the objectively assessed needs for housing and different uses. This includes planning for and allocating sufficient sites to deliver the strategic priorities of the area, except where these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies (paragraph 23).

2.2.3. The Council is required (paragraph 68) to have a clear understanding of the land available for housing in the borough and to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The Local Plan should identify a supply of specific, deliverable sites for years one to five of the plan period and specific, developable sites or broad locations for years 6 – 10 and, where possible, for years 11 – 15 of the plan.

2.2.4. In addition to housing, the NPPF 2021 requires the Local Plan to:

- set criteria, or identify strategic sites, for local and inward investment to match the economic vision and strategy and to meet anticipated needs over the plan period (paragraph 82);
- allocate a range of suitable sites in town centres to meet the scale and type of development needed for retail, leisure, officer and other main town centre uses (paragraph 86);
- plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) (paragraph 93);
- take a proactive, positive and collaborative approach to ensuring a sufficient choice of school places is available to meet the needs of existing and new communities (paragraph 95);
- seek to accommodate the need for open space, sport and recreational provision (paragraph 98);
- identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development (paragraph 106);
- support development that makes efficient use of land, taking into account:
 - the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - local market conditions and viability;
 - the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change;
 - the importance of securing well-designed, attractive and healthy places (paragraph 124).
- at the most appropriate level, set out a clear design vision and expectations so that applicants have as much certainty as possible about what is likely to be acceptable (paragraph 127);
- take a sequential, risk-based approach to the location of development, taking into account all sources of flood risk, and the current and future impacts of climate change (paragraph 161); and
- prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability (paragraph 174).

2.2.5. The Planning Practice Guidance (001 Reference ID: 3-001-20190722) sets out that an assessment of land availability can be used to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. It does not determine whether a site should be allocated for development

but provides information on the range of sites which are available to meet the council's needs. The assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability)

Regional policy and guidance

2.2.6. The London Plan 2021 (policy GG2) requires the best use of land by through:

- enabling development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, sites within and on the edge of town centres, as well as utilising small sites;
- prioritising sites which are well-connected by existing or planned public transport;
- proactively exploring the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- applying a design-led approach to determine the optimum development capacity of sites
- understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character;
- protecting and enhancing London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible;
- planning for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth; and
- maximising opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

2.2.7. The London Plan 2021 (policy D1) also requires boroughs to follow the design-led approach to establish optimised site capacities for site allocations and boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different uses. Optimising site capacity is defined (policy D3) as ensuring that development is of the most appropriate form and land use for the site and the design-led approach requires consideration of design options to determine the most appropriate

form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity.

- 2.2.8. In February 2022 the GLA published the draft Optimising Site Capacity: A Design-led Approach London Plan Guidance. This draft guidance sets out the process of setting site-specific design parameters and codes for development sites and should be used to determine the most appropriate form of development on a site.

Local policy and guidance

- 2.2.9. The Newham Local Plan Refresh is a tool to deliver the Council's core strategies. These include:

- Building a Fairer Newham Strategy (2022)
- Newham Sparks (2021 and 2022)
- Building Newham's Creative Future (2022)
- Children and Young Persons Charter (2022)
- Towards a Better Newham: COVID-19 Recovery and Reorientation Strategy (2021)
- Tackling Racism, Inequality and Disproportionality (2021)
- Climate Emergency Action Plan (2020)
- 50 steps to a Healthier Newham (2020)
- Social Integration Strategy (2020)

- 2.2.10. Building a Fairer Newham 2022 underpins the objectives and policies in the draft Local Plan and all development in the borough is expected to support and contribute to the delivery of these objectives:

- A healthier Newham and ageing well;
- An inclusive economy to support people in these hard times;
- People-friendly neighbourhoods with green and clean streets;
- Safer Newham where no-one feels at risk of harm;
- Homes for residents;
- Supporting young people to have the best start in life and reach their potential; and
- People powered Newham and widening participation in the life of the borough and the work the Council does

- 2.2.11. The approach to considering the appropriate approach to site allocations, including the proposed uses and capacity testing, incorporated the delivery of these objectives, including delivering 15 minute neighbourhood principles, increasing access to open space and healthy food environments, maintaining space for businesses and increasing access to public facilities.

2.3. Methodology

2.3.1. The approach to site allocations in the Local Plan Refresh has followed the guidance in the NPPG (see paragraph 2.2.5). Stages one and two identified and assessed sites' development potential by assessing their suitability, availability and achievability. This assessment was used during stage 3 to make a decision on whether a site should be allocated in the draft Local Plan and for which uses. Sites were then subject to capacity testing. This capacity testing informed the housing trajectory and the drafting of design principles for the site allocations at stage 4 of the process. This is set out in Figure 1 and set out in more detail in the subsequent sections of this methodology note. Further detail on the capacity testing is set out in Chapter 3 and on the housing trajectory in Chapter 4.

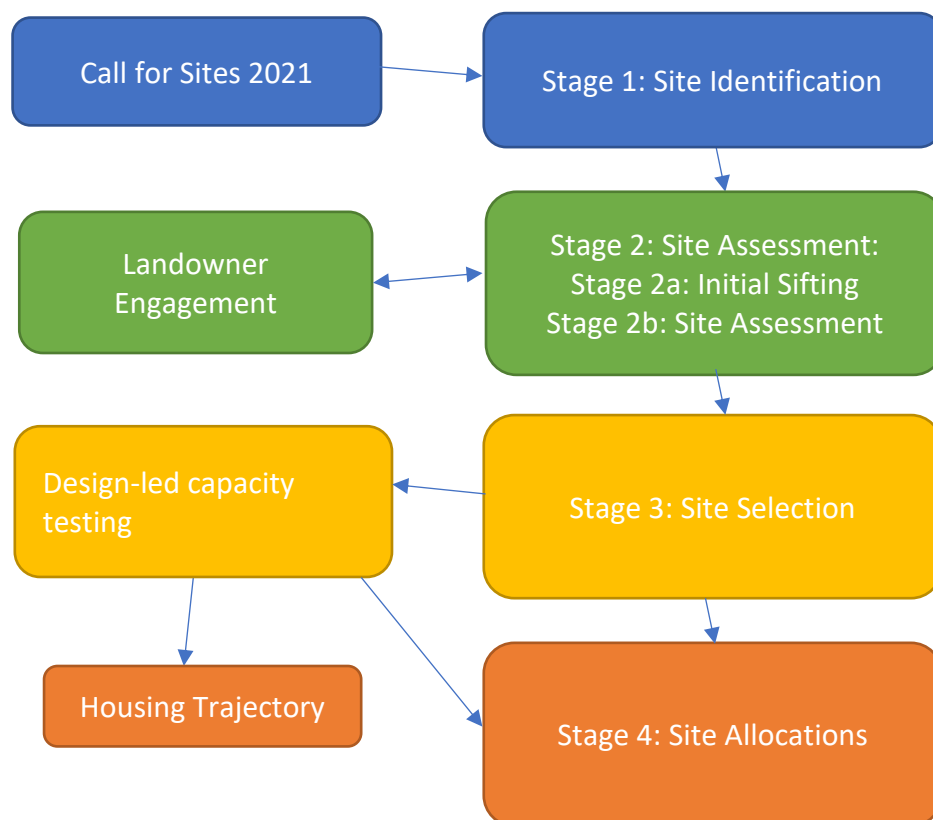


Figure 1 Site Allocation Process

2.4. Stage 1: Site identification

2.4.1. The first stage of the process was the site identification process. This brought together a long list of approximately 380 potential sites from a range of sources. When duplicate sites were removed this left approximately 300 sites to be sifted. The sources for these sites are set out in Table 1.

Table 1 Sources of sites

Source	Explanation
Call for Sites	Sites were submitted via a Call for Sites exercise which took place in October – December 2021 alongside the Issues and Options Local Plan consultation. It provided an opportunity for members of the public, developers and landowners to submit sites for consideration. 90 sites were submitted during this exercise.
Site Allocations in the adopted Newham Local Plan.	Newham Local Plan 2018 includes strategic and non-strategic site allocations. These were added to the long list of potential sites so their delivery to date could be assessed during Stage Two.
Site Allocations in the adopted LLDC Local Plan.	The LLDC Local Plan 2020 includes some site allocations that are in the Newham boundary. These were added to the long list of potential sites so their delivery to date and likely delivery prior to the end of 2024 (the LLDC transition deadline) could be assessed during Stage Two.
London Strategic Housing Land Availability Assessment 2017	The London Strategic Housing Land Availability Assessment (SHLAA) determines the quantity and suitability of land potentially available for housing as part of the preparation of the London Plan. This exercise was last completed in 2017 to inform the London Plan 2021. Sites categorised as ‘low probability’ and ‘excluded’ were added to the long list of potential sites so any change of status which meant they were now available or suitable could be assessed during Stage Two.
Brownfield Land Register	To identify any further available sites that are not allocated in the adopted Local Plan and have not yet been delivered.
Current planning applications and pre-applications	To identify any known pre-applications or planning applications which are not already allocated in the Local Plan and where a site allocation may benefit delivery of the site.
Evidence base documents	Sites identified through evidence base such as the Newham Employment Land Review or the East London Joint Waste Plan evidence base.
Other sources of sites	Any other known sites via council teams’ intelligence.

2.5. Stage 2: Site Assessment:

2.5.1. The site sifting stage took place in two stages. Stage One was the initial sifting of sites and Stage Two was a detailed assessment of sites.

2.6. Stage 2a: Initial Sifting:

2.6.1. The purpose of this stage was to make an initial judgement on whether a site is suitable, available and achievable for housing and economic development over the plan period and whether the site should be taken forward for a more detailed site assessment. It was a desk-top exercise to identify any 'showstoppers' and whether these could be mitigated as well as to identify any constraints that need to be considered further during the more detailed assessment.

2.6.2. Table 2 sets out the criteria used, the considerations and the assessment undertaken. This assessment resulted in one of the following conclusions:

- This site is suitable, available and achievable. Site is taken forward.
- This site is potentially suitable, available and achievable. Site is taken forward.
- This site is not suitable, available or achievable. Site not taken forward.

Table 2 Site sifting criteria

Criteria	Considerations	Assessment
Suitability		
Site size	Is the site smaller than 0.25ha?	<p>Sites smaller than 0.25ha taken forward where it is considered an allocation is necessary to achieve the vision for the neighbourhood. Factors considered:</p> <ul style="list-style-type: none"> • Is it the only developable site in the neighbourhood? • Could it help deliver the vision for the neighbourhood? • Could it help overcome a key challenge for the neighbourhood? <p>Small sites are defined as being smaller than 0.25ha by the London Plan (policy H2). Small sites have a role to play in</p>

Criteria	Considerations	Assessment
		meeting Newham's housing needs, meeting targets on the number of sites delivered on small sites and spreading the benefits of growth across all of Newham's 16 neighbourhoods.
<i>Environmental</i>		
Open space	Is the site Metropolitan Green Belt, Metropolitan Open Land or Protected Green Space? Is the site in an area of open space deficiency?	<p>Sites designated as Metropolitan Green Belt, Metropolitan Open Land or protected green space are not taken forward.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to protect open space.</p> <p>This will reviewed following the completion of the Metropolitan Open Land review in the Green Infrastructure Study, which will identify whether there is likely to be a case for exceptional circumstances for changes to the Metropolitan Open Land boundary.</p>
Trees	Does the site have protected trees on the site?	<p>Sites where the impact on protected trees on the site pose a significant constraint to the site, which cannot be mitigated, are not taken forward.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to protect trees because of their contribution to character of neighbourhoods and to protect green infrastructure.</p>
Air quality	Is the site in one of the borough's five Air Quality	Identify whether site is in air quality focus area and/or source of air

Criteria	Considerations	Assessment
	Focus Areas? Is the site in an area exceeding air quality limits?	<p>pollution and implications for uses and mitigation.</p> <p>This is consistent with national, London Plan and existing and emerging Local Plan policies to mitigate the impacts of poor air quality, particularly on vulnerable users, and to identify opportunities to improve air quality.</p>
Other sources of pollution	Does the site experience other forms of pollution such as noise or smell?	<p>Identify source of pollution and implications for uses and mitigation.</p> <p>This is consistent with national, London Plan, existing and emerging Local Plan to mitigate the impact of source of pollution on residents and users, including through the agent of change principle.</p>
Flood Risk	Is the site in Flood Zone 2 or 3? Is the site at risk from other sources of flooding? Are there historic flooding issues on this site?	<p>Identify whether source of flood risk and/or historic flooding issues and implications for uses and mitigation.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to take a sequential approach to flood risk and ensure appropriate uses are located on sites at risk of flooding, taking into account their flood risk vulnerability category in the NPPF.</p>
Biodiversity	Is the site a Site of Importance for Nature Conservation?	<p>Sites designated wholly as a Site of Importance for Nature Conservation are not take forward due to the impact on species and habitats.</p> <p>This is consistent with the national, London Plan and existing and</p>

Criteria	Considerations	Assessment
		emerging policies to protect Sites of Importance for Nature Conservation and to avoid harm to protected or priority species and habitats.
Contamination	Does the site have issues of land contamination from previous uses?	<p>Identify whether source of contamination and implications for uses and mitigation. Consideration should be given to viability and cost implications of mitigating contamination.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to mitigate historic contamination.</p>
<i>Design/heritage</i>		
Heritage	Does the site include heritage assets? Is the site in a conservation area or adjacent to heritage assets?	<p>Identify heritage designation or asset. Consideration of potential harm to asset and implications for uses, layout and mitigation.</p> <p>This is consistent with the national, London Plan and existing and emerging policies to conserve and enhance the historic environment.</p>
<i>Alternative designations</i>		
Industrial land	Is the site designated industrial or employment land?	<p>Designated industrial or employment land not identified suitable for mixed-use (Strategic Industrial Land and Local Industrial Land) are not taken forward. Other sites to be assessed against the findings of the Employment Land Review.</p> <p>This is consistent with the protection of industrial land in both the London</p>

Criteria	Considerations	Assessment
		Plan and existing and emerging Local Plan policies.
Waste	Is the site a designated waste sites?	<p>Waste designation to be identified. The safeguarding of waste sites will be considered through the update to the East London Joint Waste Plan rather than taken forward through the site allocation process at this stage.</p> <p>This is consistent with the protection of waste sites in both the London Plan, East London Waste Plan and existing and emerging Local Plan policies.</p>
Infrastructure	Does the site include strategic infrastructure such as transport, public safety (e.g. fire or police stations) utilities or flood defences? Is the site safeguarded for strategic infrastructure? Does the site include any community facilities as defined by the Local Plan?	<p>Sites including strategic infrastructure in active use or safeguarded for such uses are not to be taken forward unless the site is part of an agreed disposal strategy or feasible colocation is proposed. Community facilities to be considered where they can be re-provided as part of mixed-use development.</p> <p>This is consistent with the national, London Plan and existing and emerging Local Plan policies on protecting strategic infrastructure and community facilities.</p>
<i>Transport</i>		
Public Transport Accessibility	What is the site's current PTAL and what is the site's future (2031) PTAL rating?	Identify site's current and future PTAL rating, including any variations in PTAL across the site. This is consistent with the national, London Plan and existing and emerging Local Plan policies on directing development to the most accessible locations.

Criteria	Considerations	Assessment
Highways	Would development on this site cause unacceptable impact on highway safety or significant impact on the transport network (in terms of capacity or congestion)? Can safe and suitable access be achieved for all users?	Identification of potential highways or transport network impacts. To be reviewed on completion on Transport Strategy.
Availability		
Availability	<p>Is the site considered available for development during the plan period? Do we have information that the landowner has intentions to develop the site? Are there any known land ownership or legal issues that would prevent the site from coming forward?</p> <p>For existing site allocations this includes an assessment of whether the site has been delivered, has commenced, whether there are any known constraints preventing the site coming forward and whether it is still likely to come forward during the plan period.</p>	If a site was submitted via the Call for Sites process or is going through the pre-application or application process it is considered available. Existing site allocations are not taken forward if they have been fully delivered. Identify whether further land owner engagement is needed to assess availability if site has not yet been delivered and/or we do not have any information on landowner's aspirations.
Achievability		
Achievability	Is there a reasonable prospect the site will be developed during the plan period, taking account any viability issues and the capacity of the	Identify any known viability issues at this stage such as information known by development management or through landowner engagement.

Criteria	Considerations	Assessment
	landowner to bring forward and develop the site?	

2.6.3. At the end of this sifting exercise sites were discounted for the following reasons:

Table 3 Reasons sites were discounted during sifting

Criteria	Number of sites discounted
Site size	3
Open space	9
Other sources of pollution	3
Biodiversity	2
Heritage	3
Waste	6
Industrial	19
Infrastructure	90
Availability – under construction, have permission and will be delivered or have been delivered	18
Availability – landowner complexity	2
Availability – not enough certainty about availability to conclude site will come forward for development to be a site allocation	56

2.7. Stage 2b: Site Assessment

2.7.1. The sites shortlisted from the site sifting exercise underwent a detailed site assessment. The purpose of this exercise was to consider the site in more detail and to identify any constraints and opportunities that would need to be addressed through development and

design principles in any site allocation. The conclusions of the site assessment would also inform land use selection and capacity testing. Factors considered are set out in table 3.

Table 4 Site Assessment Criteria

Site constraints and opportunities	
Category	Consideration
Site boundary	Assessment of land ownership, existing delivery, site constraints and the character of the surrounding area to consider a suitable site boundary.
Land ownership	Assessment of known information from landowner including land uses aspirations, constraints (including legal) and phasing of site coming forward for development to inform availability and achievability as well as the potential boundary, uses, infrastructure requirements, design principles and phasing.
Planning history	Assessment of the planning history to inform the potential boundary, phasing, uses, infrastructure requirements and/or design principles.
Existing use	Assessment of existing use to inform uses, infrastructure requirements and/or design principles. Consideration of whether the existing uses need to be replaced and whether it has any specific requirements that have land use or design implications.
Designations	Assessment of existing and emerging Local Plan designations to inform potential uses, infrastructure requirements and/or design principles. This includes consideration of existing town centre, industrial, and community facility designations and informed by evidence base documents including Newham Retail and Leisure Study, Newham Employment Land Review and the Newham Community Facilities Needs Assessment.
Character of the site and surrounding area	Assessment of the character of the site and surrounding area, informed by the Characterisation Study, to inform potential design principles.

Open space, trees and biodiversity	Assessment of existing open space and trees on site and need identified via the emerging Green Infrastructure Study to inform potential uses and/or design principles.
Flood risk	Assessment of flood risk on and adjacent to the site to inform potential uses and design principles, particularly the location of uses across a site.
Other environmental constraints	Assessment of land contamination, noise, smell and air quality on potential uses and design principles, particularly the location of uses across a site.
Heritage	Assessment of heritage designations on and adjacent site, informed by the Characterisation Study, to inform potential design principles.
Public transport, walking and cycling and highway	Assessment of PTAL and walking, cycling and highway routes to inform potential uses, infrastructure requirements and design principles with a focus on routes and access. To be further informed by the Sustainable Transport Strategy.
Neighbourhood vision	Assessment of the vision and categorisation of the site (conserve, enhance and transform) in the Characterisation study to inform potential design principles and to assess the site's role in achieving the neighbourhood vision.
Spatial strategy	Assessment of the site's role in achieving the spatial strategy and implications of this for uses, infrastructure requirements and design principles.
Future potential	
Tall buildings	Assessment of the suitability for tall buildings, informed by the Characterisation Study, to inform potential design principles on building heights.
Uses	Assessment of the potential uses that should be allocated on this site taking into account land use designations, emerging Local Plan policies, landowner aspirations and Local Plan evidence base. Further detail on land use selection is set out below.

Infrastructure requirements	Assessment of the potential infrastructure requirements that should be allocated on this site taking into account existing uses and known infrastructure requirements. Further detail on infrastructure requirements is set out below.
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2.8. Landowner Engagement

- 2.8.1. Engagement with land owners took place throughout the site allocation identification and assessment process. This commenced with the Call for Sites exercise in October 2021. These submissions and any representations received by landowners as part of the Issues and Options consultation were considered as part of the site sifting and site assessment.
- 2.8.2. Searches were completed via Land Registry to understand any factors that may impact on a site's deliverability or availability. Letters were sent to landowners where the Council held no information about a landowner's aspirations for their site. Positive landowner engagement fed into the assessment of the suitability and availability of the site. The landowners of sites considered suitable for allocation were also contacted to provide any additional design work to that provided at Call for Sites or through recent pre-application or applications so that it could be considered as part of the capacity testing and site allocation drafting.

2.9. Land use selection and infrastructure requirements

- 2.9.1. To select land uses for different sites the following considerations were made. This involved internal workshops and discussions with infrastructure providers such as the NHS.

Housing

- 2.9.2. All sites shortlisted are considered suitable for housing.

Employment and Industrial uses

- 2.9.3. The identification of sites suitable for industrial and employment uses was informed by the Newham Employment Land Review, landowner aspirations and the assumption that existing uses on the site would be re-provided, as informed by the draft Local Plan policy and the ELR. This exercise identified where particular sectors and uses should be located in the borough and which sites were suitable for different uses to meet those requirements.

Town Centres – retail and leisure

2.9.4. The identification of sites suitable for town centre uses, retail and leisure uses in particular, was informed by the Newham Retail and Leisure Study, landowner aspirations and existing and emerging designations, particularly for new local centres. This exercise identified where particular types of retail and uses should be located in the borough and which sites were suitable for different uses and scale of uses to meet those requirements. This included information from Public Health about food deserts in the borough.

Community facilities

2.9.5. The identification of sites suitable for community facilities was informed by the Newham Community Facilities Needs Assessment and existing uses. An assumption was also made that sites within town centres would be suitable for community facilities, as informed by draft Local Plan policy.

Education

2.9.6. The identification of sites for education uses was informed by on-going engagement with the Council's Education Access and Infrastructure team about the need for different types of school places in the borough and the Newham School Place Planning Strategy 2022 to 2027. This exercise identified which sites were suitable to accommodate different types of schools, with the assumption that any primary school site would also deliver early years provision. Engagement with the Best Start in Life team also identified parts of the borough that are deficient in childcare facilities as part of the Childcare Sufficiency Assessment 2021. This exercise identified sites providing community facilities that could accommodate this type of use.

Health

2.9.7. The identification of sites for education uses was informed by on-going engagement with the NHS and their need for different amounts of health centre floorspace in different parts of the borough. This exercise identified the sites suitable for accommodating this need identified through their Call for Sites submission. Where there were options on which sites this could be accommodated on, factors such as phasing of sites was considered.

Open space

2.9.8. The identification of sites for open space was informed by the Interim Newham Green and Water Spaces Infrastructure Strategy. This identified that Newham has an under provision of open space across the borough and there are particular wards where the need for open space is particularly acute, and by an assessment of how site allocations can contribute to meeting that need, particularly on sites with capacity to provide local parks.

Built leisure needs

2.9.9. The identification of sites suitable for new built leisure facilities was informed by the Interim Built Leisure Needs Assessment which identified areas of the borough where facilities were needed. Where there were options on which sites this could be accommodated on, factors such as phasing of sites and proximity to public transport and a town centre was considered.

Other infrastructure requirements

2.9.10. Other infrastructure requirements such as bridges, public transport improvements and gasholder infrastructure were informed by the current Local Plan requirements and engagement with infrastructure providers and landowner requirements.

2.10. Stage 3: Site Selection

2.10.1. Following the site assessment process and the consideration of the suitability of sites for different uses a final decision was made on which sites should be allocated in the Draft Local Plan. This included an assessment of whether:

1. The site is suitable, available and achievable.
2. The site contributes to the spatial strategy and/or is it necessary to deliver the neighbourhood vision.
3. The same outcomes could be achieved by other means.

2.10.2. To assess whether a site was suitable, available and achievable all of the information gathered about the site during site sifting, site assessment and landowner engagement was reviewed and a final conclusion made.

2.10.3. When considering whether a site contributes to the spatial strategy and/or whether it is necessary to deliver the neighbourhood vision, the assessment assessed the role of the site in delivering the spatial strategy in terms of type and quantum of uses and infrastructure as well as factors such as whether it is the only developable site in the neighbourhood, whether it would help deliver the vision for the neighbourhood or help overcome a key challenge for the neighbourhood.

2.10.4. When considering whether the same outcomes could be achieved by other means (as set out in paragraph 23 of the NPPF), the assessment considered whether the development outcomes could be achieved without allocating the site, such as through the application of Local Plan policies, design guidance, small sites guidance, the implementation of existing planning permissions or including the site on the Brownfield Land Register.

2.10.5. The site allocation identification, assessment and selection concluded with the identification of 44 potential site allocations to be included in the Draft Local Plan. Other sites were discounted for the following reasons:

Availability - no certainty about availability that site will come forward for development to be a site allocation	2
The same outcomes could be achieved by other means	38

2.10.6. The sites considered suitable for taking forward as site allocations were then capacity tested to inform both the design principles in the site allocations and the housing trajectory. Other suitable, available and achievable sites which didn't meet the criteria to be site allocations, such as those where the outcomes could be achieved by other means, are considered as part of the housing trajectory and small sites work. This is set out in Chapters 3 and 4.

3. Site capacity testing

3.1. Introduction

3.1.1. Maccreeanor Lavington were commissioned as part of the Newham Characterisation Study to capacity test sites to be included as site allocations in the draft Local Plan. This work provides design principles for site allocations and a housing capacity figure to inform the housing trajectory. The figures have also informed the typologies in the Local Plan viability appraisal. For three sites a bespoke approach was taken: Queen's Market, which is being informed by an ongoing detailed options appraisal led by the Council's regeneration team (the Queen's Market and Hamara Ghar Investment Strategy Study); Stratford Waterfront South due to the uses (a higher education campus and student housing) being delivered on this site; and Carpenters Estate, which has just completed an extensive co-produced masterplanning processes and so did not undergo capacity testing but design principles were developed to reflect the estate masterplan.

3.1.2. This section sets out the methodology used for the capacity testing. However the capacity testing and the figures arising from that work have not been published on a site by site basis. The exact scale of housing development which will come forward on each site allocation will depend on further detailed site design work undertaken through the application process. A range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the draft Local Plan. Section 4 of this note sets provides further detail about how the capacity figures were used in the housing trajectory.

3.2. Methodology

3.2.1. In February 2022, the GLA Good Quality Homes for all Londoners (Modules A to D) was superseded by the following draft London Plan Guidance (LPG):

- Characterisation and Growth Strategy
- Housing Design Standards
- Optimising site capacity: A design-led approach
- Small Site Design Codes

3.2.2. The methodology approach takes account of the draft London Plan Guidance to ensure the approach is consistent with the London Plan 2021 and takes account of the Optimising Site Capacity in particular. In addition, the methodology draws on and is consistent with the following relevant policy and guidance:

- a. National Planning Policy Framework (NPPF) (July 2021), including Sections 3 (Plan-making), (Delivering a sufficient supply of homes), (Building a strong, competitive economy), 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe

communities), 9 (Promoting sustainable transport) 11 (Making effective use of land), 12 (Achieving well-designed places), 14 (Meeting the challenges of climate change, flooding and coastal change), 15 (Conserving and enhancing the natural environment) and 16 (Conserving and enhancing the historic environment). The National Design Guide (2021) and National Model Design Code (2021) are also relevant.

b. London Plan (March 2021), including Policies GG2 (Making the best use of land), D1 (London’s form, character and capacity for growth), D2 (Infrastructure requirements for sustainable densities), D3 (Optimising site capacity through the design-led approach), D4 (Delivering good design), D5 (Inclusive design), D6 (Housing quality and standards), D7 (Accessible housing), D9 (Tall buildings), D8 (Public realm), D13 (Agent of change), D14 (Noise) H1 (Increasing housing supply), H2 (Small sites), H4 (Delivering affordable housing), H6 (Affordable housing tenure), H19 Housing size mix) E7 (Industrial intensification, co-location and substitution), HC1 (Heritage conservation and growth), G4 (Open space), G5 (Urban greening), G6 (Biodiversity and access to nature), G7 (Trees and woodlands, SI 1 (improving air quality), SI 12 (Flood risk management), SI 13 (Sustainable drainage), S4 (Play and informal recreation), T2 (Healthy streets), T3 (Transport capacity, connectivity and safeguarding), T5 (Cycling), T6 (Car parking), T6.1 (Residential parking), T6.3 (Office parking), T6.3 (Retail parking), T6.4 (Hotel and leisure uses parking), T6.5 (Non-residential disabled persons parking) and T8 (Aviation)

c. London Plan Guidance (LPG), including the following:

- Draft Air Quality Neutral (November 2021);
- Draft Air Quality Positive (November 2021);
- Draft Urban Greening Factor (September 2021);
- Draft Large-scale Purpose-built Shared Living (January 2022);
- Draft Royal Docks and Beckton Riverside OAPF (February 2022);
- Draft Characterisation and Growth Strategy (Feb 2022);
- Draft Housing Design Standards (Feb 2022); and
- Draft Optimising site capacity: A design-led approach (Feb 2022).

d. Newham Local Plan Refresh and evidence base, including the following:

- LBN Characterisation Study 2022
- LBN Employment Land Review 2022
- LBN Retail and Leisure Assessment 2022
- LBN Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Needs Assessment 2022
- LBN Carbon Reduction Evidence Base 2022
- LBN Community Facilities Needs Assessment 2022
- LBN Built Leisure Needs Assessment 2022
- LBN Green and Infrastructure Study 2022

- Emerging Draft Local Plan policies
- Responses to the Call for Sites exercise (November & December 2021);

e. Newham SPD and other guidance, including:

- LBN Parks and Open Spaces Design Guide;
- LBN Sustainable Drainage Design & Evaluation Guide; and
- LBN Conservation Area Appraisal and Management Plans and Design Guides (where relevant).

3.2.3. Using this guidance, a proportionate approach was taken to developing design work to inform the assessment of potential capacity of sites. It was based on available information, drawing on the Characterisation Study and, where necessary, additional site-specific information provided to Maccreevor Lavington by council officers, including any information submitted via landowner engagement. It is not based on topographical or utilities surveys (topography is considered to be flat and only significant utilities such as overhead pylons have been taken in to account) or detailed site or building design layouts. As outlined below, the indicative capacity testing follows the methodology that is set out in Stages 2-4 of the draft London Plan Guidance Optimising site capacity: A design-led approach unless stated.

3.3. Site analysis

3.3.1. The capacity testing draws on an analysis of site context and takes account of the following functional characteristics and urban morphology (as detailed in Chapters 3 and 4 of the Characterisation Study):

a. Site Context

- Site context (existing land uses/buildings/landscape on site and in surrounding area, access to public transport, location relative to town centres and 15-minute neighbourhood aspirations).

b. Planning policy, guidance and history

Capacity testing takes account of the following:

- Historic development patterns (from the Characterisation Study);
- Existing London Plan and emerging Local Plan policy designations;
- Extant planning permissions for the site; and
- Pre-application discussions on potential development opportunities.

c. Environmental and infrastructure opportunities and constraints

- Environmental and infrastructure opportunities and constraints (Sites of Importance for Nature Conservation, flood zones, tree canopy cover, air quality and noise); and

- Connectivity, permeability and access to local services (street hierarchy, major routes, highways, aerial roads, high streets, The Greenway, pedestrian routes, social and community facilities and key barriers to walkability).
- d. Built form and open spaces
 - Built form and open spaces (neighbourhood character, emerging context and access to parks).
- e. Heritage and placemaking
 - Heritage assets, placemaking and landmarks.
- f. Building height, layout and uses
 - Building height, layout and uses (surrounding building heights and analysis of suitability for change in the Characterisation Study and land uses).
- g. Infrastructure capacity analysis
 - Infrastructure capacity analysis (opportunities to incorporate necessary social and green infrastructure).

3.4. Design vision

- 3.4.1. Indicative capacity testing draws on and is consistent with the evidence and findings of the Characterisation Study, including the Neighbourhood Vision and Principles and Borough-Design Principles.

3.5. Design parameters

- 3.5.1. Indicative capacity testing is based on the following general and Newham-specific design parameters and suite of topics presented in the draft Optimising Site Capacity LPG:
- a. Required minimum non-residential floorspace (sqm GEA) for land uses and social and environmental infrastructure to deliver policy objectives and facilitate growth;
 - b. On-site social and green infrastructure located to take account of environmental constraints, including poor air quality, noise sources and overshadowing;
 - c. New streets and routes to maximise connectivity with routes, services and destinations in the surrounding area, with street widths generally of 12-18m (building face to building face), in line with the Design Principles in the Characterisation Study and general street sections referred to in the National Model Design Code (to safeguard privacy, daylight and sunlight);
 - d. All homes complying with the 'Private internal space standards', 'Private outside space standards' and accessible housing standards set out in London Plan Policies D6 & D7;
 - e. The maximisation of dual aspect homes, with minimisations of north-facing single-aspect homes and taking account of BRE Site Layout and Planning for Daylight and Sunlight: A Guide to Good Practice (BR209:2022);

- f. On-site public realm, communal amenity space and play space meet the requirements of London Plan Policies D4, D8 and S4;
- g. All sites meet Draft Local Plan policy requirements for 35% to 50% affordable housing by unit rather than habitable rooms (split 65:35 Low Cost Rent: Intermediate) and;
- h. All housing tenures fully integrated within the site, with shared communal and play space being shared by occupiers of all buildings that these spaces serve;
- i. On-site cycle parking in line with minimum standards in London Plan Policy T5;
- j. On-site residential car parking & non-residential car parking restricted to operational requirements and disabled persons parking only (10%) (as set out in London Plan Policies T6 and T6.1 to T6.5);
- k. All homes in Flood Risk Zones 2 and 3 are to have habitable rooms at first floor and above only (with residential lobbies and ancillary spaces only at ground floor level);
- l. No basement levels (on the basis that these are expensive/adversely affect viability, necessitate a significant amount of energy/carbon in their creation and, when providing car parking, discourage active travel);
- m. All roof space being optimised around the provision of mechanical plant, living roofs and PV arrays (no residential amenity or play space included);

3.6. Residential Building Types

- 3.6.1. The indicative capacity testing takes account of the model typologies that are included in the draft Optimising Site Capacity LPG (Appendix 1 - Indicative Site Capacity Toolkit – Residential types) but is the product of site-specific volumetric modelling undertaken by Maccreanor Lavington using BIM software.
- 3.6.2. The massing and layout of the residential types used for the site-specific modelling is slightly different from that in the Toolkit versions, to reflect the Newham-specific design parameters set out above and to take account of the bespoke indicative layouts for each site. However, block depths and proportions are based on the typologies as set out in the Toolkit in order to ensure consistency with the draft LPG's methodology and its Indicative Site Capacity Calculator. A further refinement of the Toolkit is that proposed non-residential floorspace has been specifically drawn and measured, rather than merely discounted through the Indicative Site Capacity Calculator.

3.7. Assumed dwelling mix & tenure

- 3.7.1. Taking account of the Newham Strategic Housing Market Assessment and Gypsy and Traveller Accommodation Needs Assessment 2022 and to inform viability testing scenarios the following dwelling mix scenarios were tested to establish the impact on site capacities:

%	All tenures (scenario 1)	All tenures (scenario 2)	All tenures (scenario 3)
1 bed	15%	15%	15%
2 bed	25%	35%	45%
3 bed	55%	45%	35%
4 bed	5%	5%	5%

3.7.2. The above dwelling mix has been incorporated in to the Indicative Site Capacity Calculator spreadsheet (Figure 5.2 in draft Optimising site capacity LPG). Sensitivity testing has also been undertaken for dwelling mixes with an overall mix of 50% x 3-bed+ (scenario 2) and 40% x 3-bed+ (scenario 3). The dwelling mix is by unit, rather than habitable room, as per the GLA Indicative Site Capacity Calculator.

3.7.3. As set out in paragraphs 3.1.1 and 3.1.2 this work concluded with a capacity figure which has informed the Local Plan viability appraisal and the development of the housing trajectory. It also produced a set of design principles and a 2D site map showing key design principles which have been used to inform the draft site allocations in Section 4 of the draft Local Plan.

4. Housing Trajectory Methodology

4.1. Introduction

- 4.1.1. This section sets out the types of sites that are included within the borough's housing trajectory. It also sets out the approach to establishing the capacity of those sites assumed in the trajectory and to phasing housing capacity within the draft Local Plan's housing trajectory, which has also informed the borough's 5 year land supply.
- 4.1.2. Currently, the borough's housing target is set out within London Plan (2021) Policy H1. Newham and the part of the borough administered by the LLDC have a combined housing target to deliver 47,600 new homes between 2019/20 and 2028/29. The Draft Local Plan proposes a new range housing target for the borough of between 46,633 and 52,133 new housing units being delivered between 2022 and 2038 (for further information on the range target see section 4.3). If adopted, this target would supersede the borough's current London Plan (2021) housing target.
- 4.1.3. Tables 8 to 11 set out both the housing trajectory for the new plan period, and summarise the five year housing land supply for first five years of the plan period. Tables 8 and 10 measure the 5 year land supply and housing trajectory against the adopted London Plan housing target, while tables 9 and 11 measure the 5 year land supply and housing trajectory against the proposed housing target set out in the draft Local Plan.

4.2. Sites that are included in the Housing Trajectory

- 4.2.1. The National Planning Policy Framework (NPPF, 2021) at paragraph 68 sets out the following in relation to identifying land for homes:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

- 4.2.2. The NPPF also provides the following definitions of 'deliverable' and 'developable':

Deliverable: *To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

- 4.2.3. The former Secretary of State has indicated that the above glossary definition of ‘deliverable’ does not form a ‘closed list’, and that the examples given in the NPPF glossary are not an exhaustive list of all types of sites that are capable of being considered ‘deliverable’.¹
- 4.2.4. Table 5 below sets out the types of sites that have been included within the Draft Local Plan’s housing trajectory, whether they are considered deliverable or developable and explains how their capacity figure has been decided. Details of how these sites have been phased is set out later in this methodology note in the section 4.4.
- 4.2.5. In some instances, capacity figures may be derived from two sources, for example a site that has a planning permission for housing that has also been subject to design-led capacity testing by Maccreanor Lavington. In these instances, whichever is the higher figure has informed the higher housing target set out in the draft Local Plan Policy H1, while the lower figure has informed the lower range housing target. More information on the ‘range target’ is set out in section 4.3 below.

Table 5: Sites types included in Newham’s Draft Local Plan Housing trajectory

Site type	How capacity is derived	Are sites considered ‘deliverable’ or ‘developable’?
Sites with planning permission	Capacity reflects application housing delivery numbers.	Deliverable
Sites with resolution to grant	Capacity reflects application housing delivery numbers.	Deliverable

¹ Planning Resource, [‘Secretary of state accepts that ‘deliverable’ housing site definition is wider than NPPF’s “closed list”’](#) (June 2020)

Site allocations without a planning permission or resolution to grant.	Capacity reflects design-led capacity work undertaken by Maccreanor Lavington (see section 3 above).	Developable
Lapsed permissions	Capacity reflects lapsed application housing delivery numbers.	Developable.
The London Strategic Housing Land Availability Assessment 2017 Sites	<p>Capacity reflects housing numbers determined through the 2017 London Strategic Housing Land Availability Assessment, which were assessed as being suitable for residential development and underpin Newham’s current London Plan housing target.</p> <p>Any capacity from 2017 SHLAA sites that:</p> <ul style="list-style-type: none"> • have planning permission; • have a resolution to grant; or • are on site allocations without a planning permission or resolution to grant; <p>have been disaggregated from the SHLAA totals and are phased separately according to their relevant site type listed above.</p> <p>Any capacity on 2017 SHLAA sites considered no longer suitable for housing through the site allocations work have been reverted to 0 (for example, to reflect the draft Local Plan’s new policy position that resists co-location on Local Industrial Locations).</p>	Developable.

4.2.6. As part of the Characterisation Study the Council has prepared a small sites methodology that will be used to determine site capacity on ‘developable’ small sites (sites under 0.25ha as per London Plan policy H2 – see table 2 for further information). This work is not yet concluded, and as such the Draft Local Plan does not include capacity on these sites where they do not fall under the site categories listed in table 5. This additional capacity will be added to the Local Plan’s housing trajectory at the Regulation 19 stage of plan making.

4.3. Range trajectory

4.3.1. The housing target in policy H1 of the draft Local Plan is set out as a range figure. This is because some sites within the trajectory have high and low capacity assumptions. In most

cases this is due to a sites being subject to design led-capacity testing where the site also already has an extant planning permission that is yet to start construction. In these instances, whichever is the higher figure of the two capacity figures (a permission or design-led testing) has informed the higher range housing target figure (52,133 homes), while the lower figure has informed the lower range housing target (46,633 homes). Some lower capacity figures also reflect smaller boundary options (if part of a site requires further landowner engagement) or reduced housing capacity assumptions if key pieces of infrastructure that unlock higher density housing development are not delivered, such as the DLR extension to Beckton Riverside.

4.3.2. Delivery against our housing target each year will be monitored using the lower figure of the draft Local Plan range housing target (46,633 homes by 2038).

4.4. Methodology for site phasing

4.4.1. Housing delivery over the new plan period is split into short, medium and long term phases as follows:

Table 6: Stepped trajectory housing requirement figures set out in policy H1 of the draft Local Plan

	Short term	Medium term	Long term
Years covered	2022/23 - 2026/27	2027/28 - 2031/32	2032/33 - 2037/38
Annual target	2,990	3,363	2,478

4.4.2. Each phase of the plan has a different housing target. This is referred to as a ‘stepped trajectory’, and it helps ensure our targets in each year of the plan reflect our expectations around when sites will deliver housing units.

4.4.3. Noting the NPPF definitions of ‘deliverable’ and ‘developable’ above, the Council has adopted a standardised approach to site phasing within the trajectory. The approach to phasing different types of sites is set out below in Table 7. This approach has also informed the ‘Phasing and implementation’ section of the site allocations in the Neighbourhoods section of the draft Local Plan.

Table 7: Housing Trajectory Phasing Methodology

Consent type	Phasing
<i>Sites with planning permission or resolutions to grant planning permission</i>	
Started schemes	<ul style="list-style-type: none"> • ≤ 50 units/bed spaces: expect to complete within 1 year • > 50 units/bed spaces: expect to complete within 2 years from commencement year
Not started schemes	<ul style="list-style-type: none"> • ≤ 50 units/bed spaces: expect to complete within 2 years • > 50 units/bed spaces: expect to complete within 3 years
Prior approvals	<ul style="list-style-type: none"> • Expect to complete within 3 years from date of consent

Hybrid permissions	<ul style="list-style-type: none"> • Expect to complete within 3.5 years • If all detailed phases benefit from consent (or resolution to grant), phase as per 'Not started schemes'
Outline permissions	<ul style="list-style-type: none"> • Expect to complete within 4 years
Resolution to grant	<ul style="list-style-type: none"> • + 0.5 years on top of above phasing expectations, added from the date the resolution to grant is obtained

In instances where a developer, applicant, agent or landowner supplies information to the Borough around phasing expectations, this information will take precedent over the above outlined phasing assumptions.

A delivery rate of between 150 and 200 units per year has been assumed, dependent on the scale of the scheme.

Site allocations without a planning permission or resolution to grant

- Sites that have received landowner engagement suggesting they will be delivered in the next 5-10 years have been phased starting from the medium term of the plan period.
- Sites either:
 - dependent on large scale infrastructure delivery;
 - where landowners have indicated delivery will take place in the long term phase of the plan period; or
 - where landowners have not provided a response around delivery timescales have been phased from the long term phase of the plan period.

There are a small number of sites without positive landowner engagement that have been phased in the medium term, namely where there are a small number of units being delivered on the site and no complex infrastructure delivery requirements.

A delivery rate of between 150 and 200 units per year has been assumed, dependent on the scale of the scheme.

Lapsed permissions

- Sites that have received landowner engagement suggesting they will be delivered in the next 5-10 years have been phased starting from the medium term phase of the plan period.
- Other lapsed permission sites have been phased starting from the long term phase of the plan period.

The London Strategic Housing Land Availability Assessment (SHLAA) 2017 Sites

- Capacity from 2017 SHLAA sites have been phased starting from the long term phase of the plan period. The length of time a site will take to deliver and the distribution of capacity between phases reflects the 2017 SHLAA phasing.
- The only exception to this is where landowners have provided positive landowner engagement through our engagement on site allocations. These sites have been phased to start from the medium term of the plan period.

Sites in the London Legacy Development Corporation (LLDC) area

- These sites have been phased according to latest information from the LLDC, as they have recently undertaken an extensive landowner engagement exercise.

- There are some exceptions to this where sites have been subject to design-led capacity testing, due to evidence that a landowner may be revising the design of the site. For example, a site may be phased longer term where there is a known need to resubmit a planning application.

4.5. 5 year land supply

- 4.5.1. Tables 8 to 11 provide a summary of the Council’s Housing Trajectory and 5 Year Land Supply position respectively as at November 2022. Tables 8 and 10 have been calculated using the borough’s adopted housing target set out in the London Plan (2021), while tables 9 and 11 have been calculated using the lower range housing target set out in the draft Local Plan at Policy H1. As per London Borough of Newham’s (LBN) Housing Delivery Test (HDT) result for 2021, a 5% buffer has been applied to LBN’s 5 years land supply target².
- 4.5.2. Identified 5 year land supply sites primarily comprise consented schemes and applications with a resolution to grant from a development committee (96% of sites within the 5 year land supply). Sites with planning permission or a resolution to grant are listed individually within the 5 year supply. The remaining 4% is projected capacity from very small windfall sites (under 5 units), and one site that benefits from grant funding that requires commencement prior to April 2023 (captured under the heading ‘Remaining Custom House Site allocations’). Very small windfall sites capacity has been based on average delivery trends of sites of this size from the previous 5 years.
- 4.5.3. There are some schemes included within the 5 years land supply which gained consent following the close of last year’s starts and completions exercise. In these instances, timescales are based either on the date of consent or when a resolution to grant was obtained. This helps to ensure that phasing expectations are applied consistently for those schemes which have been granted consent within recent months.
- 4.5.4. In most instances where a developer has not supplied more detailed phasing information, a delivery rate of around 150 units / bed spaces delivering per year has been assumed. This figure has been arrived at through an examination of Newham’s historic delivery levels, which have demonstrated that on average larger-scale, major schemes deliver at a rate of least 150 units per year.
- 4.5.5. A higher delivery rate of 200 units per year had been assumed for the largest schemes in the trajectory (generally over 1000 units). This reflects delivery rates for similar-sized schemes in the borough in recent years, with schemes like Royal Wharf delivering over a thousand units per year for two consecutive years. Therefore, we consider our assumed delivery rate is relatively conservative in the context of recent delivery trends. In a small number of instances, where developments are phased in a small number of blocks or

² Paragraph 74, NPPF (2021) requires 5% unit buffer against the 5 Year Land to ensure choice and competition in the market for land.

towers, phasing is as per the number of units in individual blocks or towers, noting there is a likelihood that these units will be delivered in the same year when the individual block or tower is completed.

4.6. Analysis of projected housing delivery and future delivery trends

- 4.6.1. Table 12 provides a breakdown of the 5 Year Land Supply via wards in the Borough. All figures are accurate as at November 2022, though the Borough's housing trajectory is subject to continual updates.
- 4.6.2. Table 10 shows that Newham is unable to demonstrate a 5 year housing land supply when measured against the adopted London Plan housing target. This position is worsened when a 5% buffer is applied to the borough's capacity derived housing target. As per national guidance, shortfall against Newham's previously adopted housing requirement figure has been added to the 5 year supply target (the Sedgefield approach). Taking the shortfall and buffer into consideration Newham only has a five year land supply of 2.69 years. Table 8 demonstrates that Newham also does not have sufficient identified housing capacity to meet the Borough's London Plan housing requirement over the course of the London Plan period, with a shortfall of 15,721 units.
- 4.6.3. Recognising our considerable shortfall in meeting the housing target set out within the London Plan, our new housing target reflects the trajectory phasing approach set out in table 7. This approach to phasing has provided a more realistic housing requirement figure, set out in draft policy H1, which is based on an up-to-date assessment of deliverable sites and their phasing. Table 11 below, which provides a summary of Newham's 5 year land supply position, shows that Newham is able to demonstrate a 5 year housing land supply against the lower range target set out within policy H1 of Newham's draft Local Plan, with a land supply position of 5.14 years. Table 9 also shows that Newham has sufficient housing capacity to meet the borough's proposed cumulative housing requirement over the course of the draft Local Plan period to 2037/38, with a surplus of 5500 units.
- 4.6.4. This contrast between our ability to meet our proposed housing target and our inability to meet Newham's adopted housing target in the London Plan stems from both the different lengths of each plan period and that a significant amount of Newham's housing target will be delivered from 2028/29 onwards. This is due to significant housing delivery numbers being anticipated on large, complex site allocations, many of which require associated infrastructure delivery to facilitate high density residential development. Our anticipated delivery timescales are, therefore, reflected in the Borough's stepped housing trajectory set out within the draft Local Plan. This sets different annual housing delivery targets for the short, medium and long term phases of the plan period, reflecting our anticipated delivery timescales for deliverable and developable sites.

- 4.6.5. While Newham is not projected to meet its London Plan housing target by 2028/29, our projected housing completions show that we will deliver the London Plan's housing requirement figure for the borough in 2033/34, noting we have already delivered 9,445 homes between 2019/20 and 2021/22 (see table 8). We will also deliver housing capacity above our London Plan target across the new Local Plan period, even if the borough only meets the lower range housing target set out in policy H1 of the draft Local Plan.
- 4.6.6. Indeed, the borough may deliver more homes than the lower range of the borough's housing target, noting that we have assumed a relatively conservative delivery rate for some of the borough's largest schemes. Furthermore, as outlined in [Newham's Housing Delivery Test Action Plan \(2020\)](#), in recent years Newham has undertaken actions to support housing delivery in future years occurring faster, helping to overcome present delivery constraints. These included facilitating growth through Local Plan policies, the Royal Docks and Beckton Riverside Opportunity Area Planning Framework and commencing the refresh of Newham's Local Plan. The Action Plan also emphasised the importance of the proactive steps taken at administration level to boost housing delivery, such as the Affordable Homes for Newham programme, and maintaining constructive working relationships with stakeholders to achieve a co-ordinated approach to delivery. These stakeholders included as land owners, land promoters, residents and Duty to Co-operate Partners. Furthermore, a number of the largest of the borough's site allocations are located on land owned by the Greater London Authority, with many of these sites anticipated to be subject to strategic level investment to optimise housing delivery aligned with London's housing needs. As such, Newham should see an ambitious level of housing delivery over the course of the new Local Plan period. We will also continue to undertake regular monitoring of our housing delivery to measure our progress against both our adopted and proposed housing target set out in the draft Local Plan.

Table 8: LB Newham³ Housing Trajectory and Delivery against London Plan (2021) target (as at 01/11/22, subject to continual updating)

Year	Policy Year	Annual Figures			Cumulative Figures			Managed Delivery Figures	
		Housing Target	Net Additional dwellings ⁴ (projected completions)	Surplus/ deficit	Net Additional Dwellings (actual or projected completions)	Cumulative Target	Cumulative surplus/ deficit	Managed Delivery Target (cumulative deficit annualised over remaining plan period in addition to housing target)	Surplus/ deficit
19/20	1	4,760	3,847	-913	3,847	4,760	-913	4,760	-913
20/21	2	4,760	2,374	-2,386	6,221	9,520	-3,299	4,861	-2,487
21/22	3	4,760	3,224	-1,536	9,445	14,280	-4,835	5,172	-1,948
22/23	4	4,760	2,786	-1,974	12,231	19,040	-6,809	5,451	-2,665
23/24	5	4,760	4,913	153	17,144	23,800	-6,656	5,895	-982
24/25	6	4,760	4,507	-253	21,651	28,560	-6,909	6,091	-1,584
25/26	7	4,760	2,788	-1,972	24,439	33,320	-8,881	6,487	-3,699
26/27	8	4,760	1,156	-3,604	25,595	38,080	-12,485	7,720	-6,564
27/28	9	4,760	3,138	-1,622	28,733	42,840	-14,107	11,003	-7,865
28/29	10	4,760	3,146	-1,614	31,879	47,600	-15,721	18,867	-15,721
TOTALS		47,600	31,879						

Source: Kibana 2022/Planning Policy Monitoring Figures 2022

³ This includes sites under the administration of the London Legacy Development Corporation.

⁴ As outlined at paragraph 4.1.9 in the London Plan (March 2021), net non-self-contained accommodation for students is measured on a 2.5:1 ratio, net non-self-contained accommodation for older people (C2 Use Class) is counted on the basis of a 1:1 ratio, and all other net non-self-contained communal accommodation counts towards meeting housing targets on the basis of a 1.8:1 ratio.

Table 9: LB Newham⁵ Housing Trajectory and Delivery against Draft Newham Local Plan target (as at 01/11/22, subject to continual updating)

Year	Policy Year	Annual Figures			Cumulative Figures			Managed Delivery Figures	
		Housing Target ⁶	Net Additional dwellings ⁷ (projected completions)	Surplus/ deficit	Net Additional Dwellings (actual or projected completions)	Cumulative Target	Cumulative surplus/ deficit	Managed Delivery Target (cumulative deficit annualised over remaining plan period in addition to housing target)	Surplus/ deficit
22/23	1	2,990	2786	-204	2786	2990	-204	2990	-204
23/24	2	2,990	4913	1,923	7699	5,980	1719	3004	1909
24/25	3	2,990	4507	1,517	12,206	8,970	3236	2867	1640
25/26	4	2,990	2788	-202	14,994	11,960	3034	2741	47
26/27	5	2,990	1156	-1,834	16,150	14,950	1200	2737	-1581
27/28	6	3,363	3138	-225	19,288	18,313	975	3254	-116
28/29	7	3,363	3146	-217	22,434	21,676	758	3266	-120
29/30	8	3,363	4137	774	26,571	25,039	1532	3279	858
30/31	9	3,363	3361	-2	29,932	28,402	1530	3172	190
31/32	10	3,363	3431	68	33,363	31,765	1598	3144	287
32/33	11	2,478	3524	1,046	36,887	34,243	2644	2212	1312
33/34	12	2,478	3057	579	39,944	36,721	3223	1949	1108
34/35	13	2,478	3057	579	43,001	39,199	3802	1672	1385
35/36	14	2,478	3153	675	46,154	41,677	4477	1211	1942
36/37	15	2,478	3089	611	49,243	44,155	5088	240	2850
37/38	16	2,478	2890	412	52,133	46,633	5500	-2610	5500
TOTALS		44,633	52,133						

Source: Kibana 2022/Planning Policy Monitoring Figures 2022

⁵ This includes sites under the administration of the London Legacy Development Corporation.

⁶ As per the Regulation 18 Newham Local Plan stepped trajectory housing requirement figure.

⁷ As outlined at paragraph 4.1.9 in the London Plan (March 2021), net non-self-contained accommodation for students is measured on a 2.5:1 ratio, net non-self-contained accommodation for older people (C2 Use Class) is counted on the basis of a 1:1 ratio, and all other net non-self-contained communal accommodation counts towards meeting housing targets on the basis of a 1.8:1 ratio.

Table 10: Five Year Land Supply Summary against London Plan (2021) target

5 year supply target	23,800
Forecast Provision	16,150
Surplus/Deficit	-7,650
Percentage of housing supply above/below housing requirement	-32.14%
Years' worth of housing capacity	3.39
5% buffer	1,190
5 year supply target plus 5% buffer	24,990
Surplus/Deficit	-8,840
Percentage of housing supply above/below housing requirement including 5% buffer	-35.37%
Years' worth of housing capacity including 5% buffer	3.23
Previous years' shortfall	-4,835
100% Shortfall plus 5 year supply target	28,635
Forecast Provision	16,150
Surplus/Deficit	-12,485
100% Shortfall plus 5 year supply plus 5% buffer	30,067
Surplus/Deficit	-13,917
Percentage of housing supply above/below housing requirement plus shortfall and including 5% buffer	-46.29%
Years' worth of housing capacity plus shortfall and including 5% buffer	2.69

Table 11: Five Year Land Supply Summary against Draft Newham Local Plan target

5 year supply target	14,950
Forecast Provision	16,150
Surplus/Deficit	1,200
Percentage of housing supply above/below housing requirement	+8.03%
Years' worth of housing capacity	5.40
5% buffer	748
5 year supply target plus 5% buffer	15,698
Surplus/Deficit	452
Percentage of housing supply above/below housing requirement including 5% buffer	+2.88%
Years' worth of housing capacity including 5% buffer	5.14

Table 12: Five Year Land Supply Sites

5 Year Housing Supply as at November 2022							
(subject to continual amendment as updated information becomes available; figures net and are most reliable at the Borough level and when totalled across 5 years).							
	5 year	22/23	23/24	24/25	25/26	26/27	Ward
		1	2	3	4	5	
VERY SMALL SITES							
Total Very Small Sites <5 units (estimated based on previous 5 year average and including LLDC area)	430	86	86	86	86	86	All
LARGE SITES (>=5 net units)							
East Ham Industrial Estate (17/01247/FUL)	102	102	0	0	0	0	Beckton
2 Dewberry Gardens (20/00533/FUL)	5	0	5	0	0	0	Beckton
Gallions Quarter - Phase 2B (14/00664/OUT)	267	267	0	0	0	0	Beckton
Gallions 3B (18/00623/FUL)	238	0	119	119	0	0	Beckton
45 Beckton Road (20/01996/FUL)	10	10	0	0	0	0	Canning Town North

116 Barking Road (20/02284/FUL)	5	0	5	0	0	0	Canning Town North
Malmesbury Terrace (19/03284/LA3)	15	15	0	0	0	0	Canning Town North
191 Hermit Road (21/00973/FUL)	6	0	6	0	0	0	Canning Town North
The Gate House (22/00403/FUL)	5	0	0	5	0	0	Canning Town North
101-103 Hermit Road (19/02812/FUL)	7	7	0	0	0	0	Canning Town North
Stephenson Street Parcelforce (17/01847/OUT)	1529	315	359	369	243	243	Canning Town North
Manor Road (18/03506/OUT)	804	0	355	287	162	0	Canning Town North
Areas 7 and 1C Barking Road (17/04046/REM & 17/04045/VAR)	620	300	188	132	0	0	Canning Town South
117-125 Freemasons Road (15/03632/FUL)	18	0	18	0	0	0	Custom House
Remaining Custom House Site allocations	150	0	0	150	0	0	Custom House
Morse Close (21/01584/LA3)	17	0	0	17	0	0	Plaistow West & Canning Town East
301-305 Barking Road (18/03457/FUL)	17	17	0	0	0	0	Plaistow West & Canning Town East
2A King Street (21/00399/FUL)	-6	0	0	-6	0	0	Plaistow West & Canning Town East
Glory House (21/00830/FUL)	80	0	0	80	0	0	Plaistow West & Canning Town East

Red House, 299 Barking Road (18/00468/FUL)	7	7	0	0	0	0	Plaistow West & Canning Town East
34-36 Sutton Road (20/02033/LA3)	24	0	24	0	0	0	Plaistow West & Canning Town East
36 New Barn Street (21/03040/LA3)	32	0	0	32	0	0	Plaistow West & Canning Town East
Coach and Horses (18/01394/FUL)	8	8	0	0	0	0	Plaistow West & Canning Town East
London Road (Part) (17/00951/FUL)	100	0	100	0	0	0	Plaistow West & Canning Town East
St Margarets Convent (21/02777/FUL)	5	0	5	0	0	0	Plaistow West & Canning Town East
West End Car Park (20/00544/FUL)	854	209	105	218	322	0	Royal Victoria
Land At Thameside West And Carlsberg Tetley (18/03557/OUT)	400	0	0	0	200	200	Royal Victoria
Silvertown Quays (14/01605/OUT & 19/02657/REM)	943	0	471	472	0	0	Royal Victoria
Deanston Wharf (16/00527/FUL)	769	0	64	705	0	0	Royal Victoria
1 Bradfield Road (19/00517/FUL)	54	54	0	0	0	0	Royal Victoria
Land Adjacent West Silvertown DLR Station (19/01791/FUL)	252	0	0	126	126	0	Royal Victoria
Etap Accor Hotel (18/00678/FUL)	140	0	0	0	140	0	Royal Albert
Unit 3 Thames Road (20/01046/FUL)	161	0	0	161	0	0	Royal Albert

Land Corner Of Store Road And Pier Road (17/02106/FUL)	163	0	81	82	0	0	Royal Albert
Land Adjacent 19 Woolwich Manor Way (18/03375/FUL)	9	0	9	0	0	0	Royal Albert
Albert Island (20/00051/FUL)	16	0	16	0	0	0	Royal Albert
Chobham Manor (11/90621/OUTODA & 16/00518/REM)	161	161	0	0	0	0	Stratford Olympic Park (LLDC)
Chobham Farm (19/00473/REM)	238	36	0	0	0	202	Stratford Olympic Park (LLDC)
Chobham Farm North (12/00146/FUM)	200	0	0	200	0	0	Stratford Olympic Park (LLDC)
East Village (14/00066/REM, 14/00056/REM & 14/00141/REM)	946	48	898	0	0	0	Stratford Olympic Park (LLDC)
Stratford International Bus Layover Site (19/00391/FUL)	380	0	380	0	0	0	Stratford Olympic Park (LLDC)
Cherry Park/Angel Lane (15/00358/OUT)	1224	377	0	349	216	282	Stratford Olympic Park (LLDC)
UCL East (17/00235/OUT)	220	220	0	0	0	0	Stratford Olympic Park (LLDC)
68-70 High Street (11/90619/FUMODA)	173	0	173	0	0	0	Stratford (LLDC)
Sugar House Lane (12/00336/LTGOUT)	760	65	308	271	116	0	Stratford (LLDC)
Bridgewater Road (21/00403/OUT)	143	0	0	0	0	143	Stratford (LLDC)
Vulcan Wharf (20/00307/FUL)	457	0	229	0	228	0	Stratford (LLDC)

Pudding Mill (14/00422/FUL)	188	0	0	188	0	0	Stratford (LLDC)
Odelia Court, 1B Biggerstaff Road (21/00172/PRNSDB)	22	0	0	0	22	0	Stratford (LLDC)
180 High Street (20/00490/FUL)	7	0	7	0	0	0	Stratford (LLDC)
Jubilee House (21/00483/FUL)	286	0	0	0	286	0	Stratford (LLDC)
Poland House (20/00310/FUL)	73	0	73	0	0	0	Stratford (LLDC)
Morgan House (18/03088/FUL)	423	0	0	116	307	0	Stratford
61 Broadway (20/02402/PRECOU)	7	7	0	0	0	0	Stratford
Grove Crescent Road (21/02975/FUL)	159	0	0	0	159	0	Stratford
David Street (19/02977/LA3)	12	12	0	0	0	0	Maryland
The Cart And Horses, 1 Maryland Point (17/02285/FUL)	29	29	0	0	0	0	Maryland
2A-2B Windmill Lane (17/03647/FUL)	23	0	23	0	0	0	Maryland
80 Henniker Road (17/03501/FUL)	8	8	0	0	0	0	Maryland
Idmiston Road (19/02978/LA3)	8	8	0	0	0	0	Maryland
Bramall Close (15/03411/FUL)	16	16	0	0	0	0	Maryland

82 Leytonstone Road (20/01826/FUL)	8	0	8	0	0	0	Maryland
19 Water Lane (18/03200/FUL)	8	0	8	0	0	0	Maryland
Land To The Rear Of 52 To 66 Eastbourne Road (20/01654/LA3)	21	0	21	0	0	0	West Ham
3 New Plaistow Road (18/03209/FUL)	26	0	26	0	0	0	West Ham
196 Plaistow Road (19/01456/FUL)	9	0	9	0	0	0	West Ham
John Street (21/01628/LA3)	70	0	0	0	70	0	West Ham
The Britannia (17/04194/FUL)	6	0	6	0	0	0	West Ham
Development Site 21 To 55 Arthingworth Street (20/02130/LA3)	-14	-14	0	0	0	0	West Ham
Hartley Centre (20/02264/FUL)	75	0	75	0	0	0	East Ham
123 High Street North (21/01428/FUL)	9	0	0	9	0	0	East Ham
104-106 High Street North (19/00204/FUL)	7	0	7	0	0	0	East Ham
The Shopping Mall, Myrtle Road (17/03612/FUL) S25	83	83	0	0	0	0	East Ham
Coop St.Johns Rd Car Park (16/03805/FUL)	98	0	98	0	0	0	East Ham
S26 Town Hall Annexe (18/03232/VAR)	37	37	0	0	0	0	East Ham

Development Site At 131A To 135A High Street North (21/01878/PREAA)	6	0	0	6	0	0	East Ham
HSG9 156-158 Katherine Road (17/03028/FUL)	9	9	0	0	0	0	East Ham
33 Vicarage Lane (17/03383/FUL)	5	5	0	0	0	0	East Ham
216 High Street South (21/03054/LA3)	48	0	0	48	0	0	East Ham South
25 Folkestone Road (17/04101/FUL)	27	0	27	0	0	0	East Ham South
The Dukes Head (20/02192/FUL)	11	0	0	11	0	0	Wall End
Land at 89 to 93 Woodgrange Road (20/02800/FUL)	9	0	9	0	0	0	Forest Gate North
Land Between 2 and 2A Clinton Road (19/03451/FUL)	7	7	0	0	0	0	Forest Gate North
236 Romford Road (19/02604/LA3)	11	0	11	0	0	0	Forest Gate South
12 - 14 Upton Lane (16/03744/FUL)	9	9	0	0	0	0	Forest Gate South
55-59 Upton Lane (18/02418/FUL)	20	0	20	0	0	0	Forest Gate South
Development Site Rear Of Atherton Lodge (19/03175/FUL)	8	8	0	0	0	0	Forest Gate South
1A Nursery Lane (21/01832/FUL)	7	0	7	0	0	0	Forest Gate South
Methodist Church Hall (18/02396/FUL)	31	0	31	0	0	0	Forest Gate South

Durning Hall (20/02849/FUL)	78	0	0	0	78	0	Forest Gate South
39A to 49A Woodgrange Road (16/02395/FUL)	74	0	74	0	0	0	Forest Gate South
165-167 Romford Road (17/00431/FUL)	5	5	0	0	0	0	Forest Gate South
Land Adjacent 3 Disraeli Road (19/01215/FUL)	6	6	0	0	0	0	Forest Gate South
Palatine Building, 304 - 306 Romford Road (17/04083/FUL)	5	0	5	0	0	0	Forest Gate South
7 Flint Close (20/01763/FUL)	4	0	4	0	0	0	Forest Gate South
365 - 367 Romford Road (20/01326/FUL)	41	0	41	0	0	0	Forest Gate South
6 Flint Close (22/00445/FUL)	4	0	0	4	0	0	Forest Gate South
60-62 Barking Road (19/03466/FUL)	24	24	0	0	0	0	Boleyn
West Ham Football Ground (14/02893/FUL)	72	72	0	0	0	0	Boleyn
2 Boleyn Road (18/03321/FUL)	42	42	0	0	0	0	Boleyn
Boleyn Cinema (19/03053/FUL)	79	0	0	79	0	0	Boleyn
277B Green Street (18/02480/FUL)	7	7	0	0	0	0	Green Street East
453 Katherine Road (19/01122/FUL)	7	0	7	0	0	0	Green Street East

The Upton Centre (18/03413/FUL)	65	0	65	0	0	0	Green Street West
340-344 Green Street (20/01999/FUL)	8	0	8	0	0	0	Green Street West
23 Harold Road (19/01335/FUL)	28	0	28	0	0	0	Green Street West
354 - 356 Green Street (17/01260/FUL)	9	0	9	0	0	0	Green Street West
Shalimar House, 1 Harold Road (18/02032/FUL)	9	9	0	0	0	0	Green Street West
Rear of 330 Romford Road (19/02679/FUL)	15	0	15	0	0	0	Green Street West
248 High Street North (20/00595/FUL)	6	0	6	0	0	0	Plashet
272 High Street North (18/03418/FUL)	7	0	7	0	0	0	Plashet
Garage Site, 1-158 Hathaway Crescent (21/02996/LA3)	72	0	0	72	0	0	Little Ilford
Landseer Avenue (19/03282/LA3)	11	11	0	0	0	0	Little Ilford
2A Michigan Avenue (19/01001/PRECOU)	9	9	0	0	0	0	Little Ilford
The Victoria Cross (19/00622/FUL)	9	9	0	0	0	0	Little Ilford
Greenhill Centre (21/01737/LA3)	81	0	0	81	0	0	Manor Park
Earl Of Essex (18/02736/FUL)	9	0	9	0	0	0	Manor Park

656-666 Romford Road (18/01889/FUL)	22	0	22	0	0	0	Manor Park
Garages 2 To 16 Forest View Road (19/03281/LA3)	27	0	0	0	27	0	Manor Park
Valetta Grove (Part) (17/00951/FUL)	82	0	82	0	0	0	Plaistow North
Royston Court (20/02175/FUL)	7	0	7	0	0	0	Plaistow North
665 Barking Road (17/03610/FUL)	7	0	7	0	0	0	Plaistow North
56-64 Puran House (18/00156/NONDET)	4	0	4	0	0	0	Plaistow North
9 Prince Regent Lane (18/02659/FUL)	36	36	0	0	0	0	Plaistow South
17-21 New Barn Street (19/03242/LA3)	8	0	8	0	0	0	Plaistow South
Garages at New City Road (20/00758/LA3)	28	28	0	0	0	0	Plaistow South
750-758 Barking Road (21/01050/PRECUJ)	38	0	0	38	0	0	Plaistow South
Francis House (19/03384/PRECUJ)	31	0	31	0	0	0	Plaistow South
5 Kent Street (21/01984/COU)	4	0	4	0	0	0	Plaistow South
Total	16150	2786	4913	4507	2788	1156	