

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?

Introduction

Supervene act as planning advisors to Vastint UK B.V., the owners and developers of Sugar House Island new neighbourhood, Site Allocation N7.SA3; one of three allocated sites within the Three Mills Neighbourhood (N7). On behalf of Vastint, Supervene submitted representations to the Reg 18 Draft Newham Local Plan (DNLP) in relation to allocation N7.SA3 and policy D4. We subsequently wrote on 27th August 2025, mainly in relation to various inconsistencies in the Reg 19 plan.

This statement expands on comments made previously in relation to Policy D4 and should be read in conjunction with two other statements, one relating to Q9.2(a) and the other relating to Q4.9.

Planning Permission (PP) was granted for the redevelopment of this previously industrial site in 2012 (12/00336/LTGOUT) and construction is now well underway, and approximately 35% complete.

The site allocation N7.SA7 broadly reflects the PP granted and is welcomed however the PP for one corner of the allocation has now expired making the contents of the new Local Plan very relevant to that part of the site.

Policy D4 and the Policies Map

The prevailing height across the entire SA3 allocation is identified on the Policies Map as being above 21m but below 32m (7-10 storeys) which accurately reflects the PP granted in 2012, although a number of taller elements/accents up to 16 storeys were also approved in the PP. This is reflected in the heights set out in TBZ 18 and identified by the dashed red line on the Plan on page 79 of the Reg 19 Draft Local Plan; where 50m Maximum Height is applied to the majority of the N7.SA3 allocation.

This Maximum height also applies to most of the land to the north of Sugar House Island within the Pudding Mill allocation – (N8.SA9).

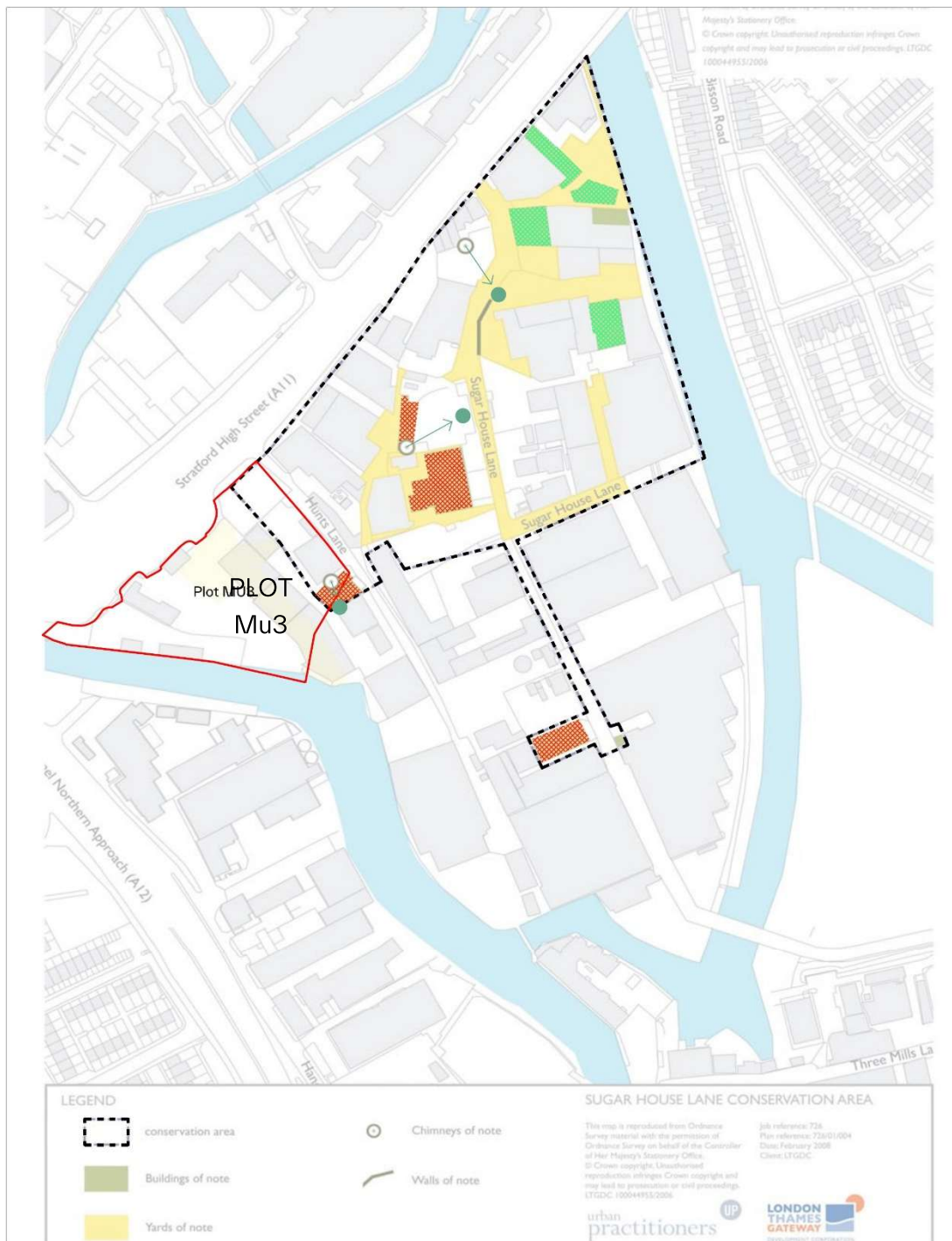
However part of the N7.SA3 allocation comprising a small corner plot abutting Stratford High Street and the Bow Flyover (Known as Plot Mu3) has been identified for a lower Maximum Height of only a 32 m which we do not consider is justified for reasons set out below.

No Justification for 32m Maximum Height Area

Having reviewed the background evidence for the Tall Buildings strategy, notably the Mc Creanor Lavington Newham Characterisation Study 2024 including the Tall Building Annex thereto, the reason for this lower Maximum Height in the corner of the N7.SA3 allocation appears to be because they've identified it in their study as an area '*somewhat sensitive to change*'. The reason for this isn't explicitly stated but it appears to be due to the proximity of the Sugar House Lane Conservation Area (SHLCA).

Although The Conservation Area does indeed extend west to just beyond Hunts Lane, the entire area of the Conservation Area has already been subject to enormous change and is unrecognisable when compared to how it was when it was designated. A visit to the site makes this abundantly clear.

The SHLCA was designated in June 2008, when the entire site was in industrial use and it identified a number of Yards of Note and Buildings of Note (see plan extract from the Character Appraisal and Management Proposals for the SHLCA – dated Jan 2010 below), primarily with the intention of retaining the industrial character of the site.



Extract from the Sugar House Lane Conservation Area Character Appraisal and Management proposals 2010 identifying Buildings & Yards of Note (some of which were subsequently demolished as identified)

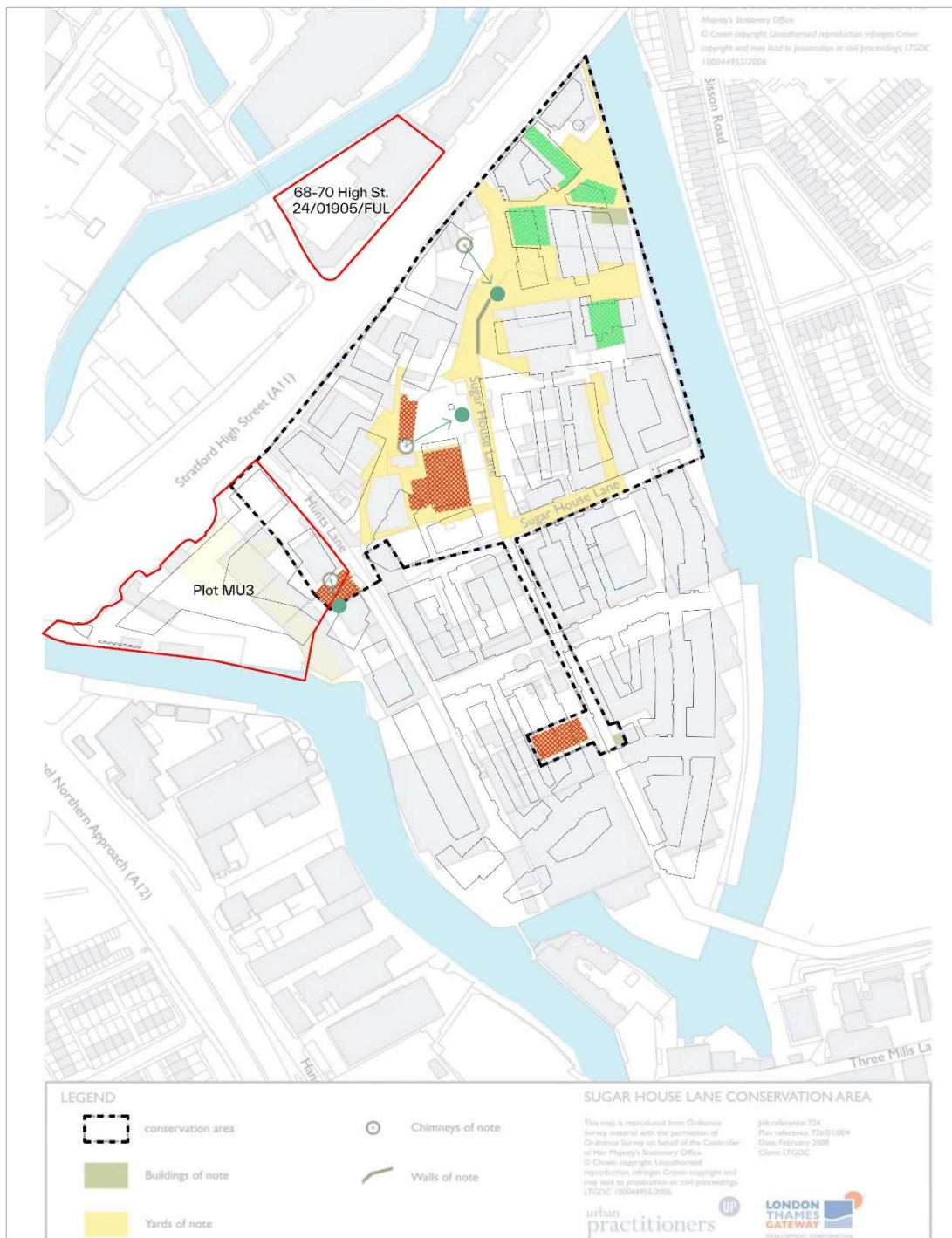
Key

- X Demolished
- X Retained
- Chimneys relocated
- Plot MU3 / 68-70 High St.

The Masterplan approved as part of the 2012 PP broadly reflected the strategy for the SHLCA to retain the Yards Of Note and some of the Buildings Of Note although many of the latter were ultimately removed once their structure had been assessed, including the Building of Note on Hunts Lane (on land which falls within Plot Mu3).

The plan and photos below show the site as it now is following the implementation of the 2012 PP and Reserved Matters pursuant thereto, clearly demonstrating that this part of the Conservation Area has changed beyond recognition.

The 2012 PP and its implementation makes reliance upon the conservation area as it was when designated in 2008, a questionable basis in terms of assessing the character of the area.



SHLCA With Approved Development (12/00336/LTGOUT) Overlaid

- Key**
- Demolished
 - Retained
 - Chimneys relocated
 - Approved Building Outlines
 - Plot MU3 / 68-70 High St.

SUPERVENE



In circumstances where the area has already changed so much there appears to be no justification for defining this corner of the N7.SA3 allocation as '*somewhat sensitive to change*' and for buildings taller than 32m to be resisted.

Since the Grant of Hybrid Planning Permission in 2012

- Expiry of the Planning Permission for the westernmost corner of the site known as plot Mu3.

Plot Mu3 had in the 2012 PP been identified for a hotel with commercial floorspace and 21 residential units, with a height of 9 storeys, however the PP for that corner plot (known as Mu3) has now expired as the Reserved Matters were not approved within the prescribed timeframe.

So in the 13 years since the grant of the original PP and following the expiry of PP for plot Mu3, Vastint have been reconsidering how this plot may be developed. They have undertaken further feasibility work since the submission of representations to the Reg 18 plan, and attach as Annex A an updated feasibility study providing a visual impression of how a taller building might sit on this plot in the context of existing nearby buildings and the 29 storey building which LB Newham have resolved to grant consent for just a few hundred metres down Stratford High Street (considered in more detail below).

- Planning Policy Changes

Planning policy has changed since the grant of hybrid planning permission in 2012, including the housing delivery situation, the adoption of The London Plan 2021, the revision of the National Planning Policy contained in the National Planning Policy Framework (NPPF) Dec 2024 which seeks to address the housing delivery crisis by encouraging the more efficient use of land, and now the more recent proposed relaxation of planning policy relating to the urgent need to deliver more housing in London (Ministerial Press Release dated 23rd October 2025).

- The London Plan 2021

This plan seeks in Policy D1 Londons Form, character and capacity for growth - Part B3) to optimise '*..... site capacity through the design led approach to establish optimised capacities for site allocations.*' (our emphasis)

Paragraph 3.1.7 in support of Policy D1 notes '*As change is a fundamental characteristic of London, **respecting character and accommodating change** should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change.*'

Policy D3 Optimising site capacity through the design-led approach – reiterates the requirement for *‘A all developments to make the best use of land by following the design led approach that optimises the capacity of sites , including site allocations’*

B higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. (Our emphasis).

Sugar House Island represents such an area, being an existing neighbourhood, on brownfield land adjacent to existing and approved Tall Buildings and well connected to public transport.

Applying the ‘sequential spatial approach to making the best use of land’ set out in Policy GG2 Parts A to C supports the allocation of such sites.

Policy GG2 Making the Best Use of Land requires that development of brownfield land is enabled (A), that sites with good transport accessibility are prioritised (B), that the potential to *‘intensify the use of land to support additional homes and workspaces is proactively explored promoting higher density development particularly in locations that are well-connected to jobs, services infrastructure and amenities by public transport, walking and cycling (C)* (our emphasis)

Policy D9 Tall buildings

This policy requires Boroughs to determine the locations of Tall Buildings (>18m) in Development Plans, as LBN are doing.

It goes on to list the impacts that development proposals should address including visual impact, functional impact, environmental impacts and cumulative impacts. These would of course be addressed in any application for a Tall Building which may come forward and would be considered in the normal way.

- **National Planning Policy – December 2024**

Places great emphasis on the delivery of growth (para 61) and encourages the efficient use of land (para 124-126).

The Government sets out their objectives to achieve sustainable developments in Paras 7 and 9 and enshrines the presumption in favour of sustainable development including how this is to be achieved through plan making (para 11).

Para 61 states the Governments objectives of significantly boosting the supply of homes through bringing forward a sufficient amount and variety of land and para 69 requires policy

making authorities to establish their housing need and set our requirements for designated neighbourhoods.

Para 77 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development Providing they are well located and designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). (Our emphasis).

Para 110 states that significant development should be focused in locations which are or can be made sustainable through limiting the need to travel and recommends policies to achieve this through various means in para 111 and section 11 (paras 124, 125 and 126) requires planning authorities to identify suitable brownfield sites.

The new neighbourhood at N7.SA3 represents an ideal location for sustainable development on brownfield land as an addition to an emerging neighbourhood, which makes efficient use of land in accordance with para 129.

– **Ongoing construction of the Sugar House Island new neighbourhood**

The Sugar House Island site is a site allocation that already has PP and is already delivering housing. It is a brownfield site in the single ownership, of Vastint, who are themselves bringing the development forward. The site preparation including new river walls around the entire site and remediation has been completed, and most of the infrastructure for the entire neighbourhood is already in place. Approximately 35% of the development is built so far including 380 Residential units. The permission granted in 2012 permits 1200 homes and the remaining 850 units are in the process of being delivered and will be delivered by 2033. (See Supervene Statement relating to MIQ Q4.9)

– **Nearby developments**

In addition to new policy and the ongoing completion of the surrounding site, further new buildings are in the process of being approved in Stratford High Street, notably the application at 68-70 High Street (24/01905/FUL) for 29 and 11 storey residential towers to provide 355 residential units (272 for Build to Rent and 83 affordable units). Despite being outside the Tall Building Zone identified in the London Legacy development Corporation Local Plan LB Newham resolved to grant consent for this application on 18th March 2025 and it is currently with the GLA for Stage 2 consideration.

Conclusion - Proposed Changes to the Local Plan Requested

The changes to the context as described, justify the removal of the 32m Tall Building Zone, within the N7.SA3 site allocation which appears to have no justification other than that was what was permitted on that plot previously, way back in 2012.

Such a limitation will not be effective in helping to meet identified needs for housing and other development in an appropriate way that is consistent with National Policy and the London Plan.

The relaxation of this overly restrictive height limit will allow the opportunity for development including housing to be optimised in this area, which is a brownfield site, already prepared for development and where the new neighbourhood and the facilities to support new development is already partially in place with the remainder in the process of being delivered.

This justifies an increase in the Maximum Heights for the North West from 32m, to, at a minimum the same Maximum Height of 50m identified for all the surrounding land, both north of Stratford High Street and elsewhere in the N7.SA3 allocation and denoted by the red dashed line. Although in the context of the surrounding developments, both already built and resolved by LBN to be approved (on 68-70 High Street), a Maximum Height of 100m would actually be justified in this location to make the most efficient use of the land.

Obviously, these would represent Maximum's and any development which comes forward would require planning permission which would involve all the technical work being submitted to demonstrate the acceptability of such a building – sunlight daylight, wind, overshadowing, so more detailed technical considerations would take place then.