

Hearing Statement prepared on behalf of the Anjuman-e-Islahul-Muslimeen

London Borough of Newham Local Plan
Submission Stage (Regulation 22) – Matter 4

November 2025

1 Introduction

- 1.1 This Statement is made on behalf of the Anjuman-e-Islahul-Muslimeen (London) UK ('AeIM') the owners of the majority of the Abbey Mills site¹) ('Site') (**Appendix 1**).
- 1.2 AeIM and the London Borough of Newham ('LBN') seek to agree a clear and coordinated approach for development of the Site consistent with a sound spatial strategy for Newham.
- 1.3 A pre-application meeting was held with LBN on 30 October 2025 to present a masterplan (**Appendix 8 & 10**), alongside evidence to substantiate density and height parameters (**Appendix 2-4, 9, 11**).
- 1.4 This Statement addresses proposed Policy N7.SA1 and focuses on amendments that are required to make LBN's draft Local Plan ("the Plan") sound given the scale of development capable of being accommodated on Site.

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

- 1.5 No. LBN's housing target should address the target set out in the London Plan of 4,760; LBN's current backlog; and 20% buffer². This amounts to 8,001 homes per year in the first five years of the Plan and at least 99,968 homes over the Plan period.
- 1.6 The Plan does not credibly demonstrate how it achieves a 5-year housing land supply. This exacerbates LBN's current (and historic) weak supply position.
- 1.7 LBN's approach to arrive at its housing targets cited in the Plan is flawed: it disregards the London Plan housing target; it relies on site capacity assumptions derived from build out rates that are insufficient to provide reliable outputs; and the site capacities from which their target is derived have not been previously disclosed by LBN.
- 1.8 This lack of clarity means LBN is floating several possible targets. LBN's evidence [EB058, paragraph 4.1.4] identifies one of "between 53,194 and 54,976 dwellings". However, LBN's response to PQ20 identifies a "lower range housing target of 51,425". Uncertainty surrounding this key issue is wholly inconsistent with sound policy making.
- 1.9 There is a clear link between the housing target and policies related to the quantum of development LBN is seeking from allocated sites. Failure to recognise its housing target results in a failure of policy to give housing growth necessary priority.
- 1.10 Policy N7.SA1 should be modified to identify a minimum number of homes which absorbs some of the shortfall in the Plan's 5-year housing land supply and beyond, address the need accommodate both the Council's historic failure to deliver housing, and to include a 20% buffer.

¹ Site Allocation N7.SA1

² which we will address in response to Matter 5 if necessary

- 1.11 This Statement is predominantly specific to Policy N7.SA1 but several principles are likely to apply to all housing allocation sites in the Plan. The Plan should maximise housing delivery borough wide in approach to capacity, factoring in site and specific circumstances. Our analysis³ demonstrates adjustments to this site allocation can be made, rather than finding new sites to meet the shortcomings of LBN's housing supply.
- 1.12 LBN's response to PQ7⁴ seeks to address the question of the Plan's conformity with the London Plan, and specific to capacity, identifies the "...clear delivery challenges that London has faced since the publication of the 2017 SHLAA, namely as a result of poor economic conditions." The Council is not proactively addressing these challenges within the Plan⁵ and fails to maximise the development opportunities on site allocations, based upon a design led approach.
- 1.13 LBN's PQ24⁶ response claims they have adopted a design led approach required by London Plan Policy D3, whilst also seeking to recognise that the exact scale of housing for each site allocation depends on detailed site design work undertaken through the application process. The approach to Policy N7.SA1 does not demonstrate any sound design-led approach. LBN acknowledges at b) that a range of housing capacities could be delivered while still meeting the design, housing, neighbourhood and site allocation policies and design requirements in the Local Plan. It is unsound for LBN to apply a restrictive or prescriptive height cap in circumstances where this is not underpinned by any robust evidence base, and where LBN acknowledges that each application would be determined on its own merits. This does not properly reflect the approach taken within London Plan Policy D3. Policy D3(B) acknowledges that higher density developments should generally be promoted in locations that are well connected and where these locations have existing areas of high-density buildings. Part (B) guides that the expansion of these areas should be positively considered by Boroughs where appropriate. It is difficult to envisage a more obvious location than the Site where such positive consideration for higher density development should be anticipated.
- 1.14 We consider the Policy as drafted to be unsound as it puts an artificial, unnecessary and inherently unsound cap on building heights⁷. The Policy could be made sound by relying on the approach in London Plan Policy D3 and supporting and applying much greater weight to the existence of emerging high-density developments within the immediate locality of the Site itself.

In particular:

Q4.9(a) - The requirements relating to existing and new community facilities on site N7.SA1 and whether they will be effective in meeting the particular needs of the local community.

- 1.15 London Plan Policy S1 requires that the social needs of London's communities are met. The prescription that the Site should do no more than re-provide existing facilities in terms of size is inherently unsound and fails to meet or reflect London Plan Policy S1, particularly given the

³ being discussed with LBN

⁴ PQ7. (a) Does the Council accept that the submitted Plan is not in general conformity with the London Plan? (b) If not, why not*, given the Mayor's opinion?

⁵ as exemplified by its approach to Policy N7.SA1

⁶ PQ24. (a) Does the submitted Plan allocate every site that the Council's evidence indicates is suitable and available for development? (b) Does the submitted Plan assume that the number of homes built on the allocations will be optimised and contain policies aimed at achieving that (taking account of constraints and other policies including relating to industrial land, environmental assets etc)? (c) What does the Council's evidence for the submitted Plan indicate the indicative capacity (net additional homes) to be for each allocation (i.e. the capacities that collectively contribute to the overall target of 51,425 to 53,784 homes)?

⁷ see Hearing Statement in response to Matter 3

substantial increase in forecast need for mosque worship space over the Plan period. Whilst one could understand the logic of policies that seek to protect loss of existing community facilities⁸, there is no logic or other policy support⁹ in seeking to constrain delivery of new community facilities to the size which currently happens to exist on a site. A sound policy¹⁰, should seek to foster and support delivery of community facilities and there should not be a requirement to demonstrate “need” in any event (albeit such need clearly exists – see above).

- 1.16 LBN has conceded elsewhere in its evidence base that the baseline position for community facilities is weak in the local area¹¹. Analysis shows there are no other Muslim places of worship within a 15-minute walking distance of the Site.
- 1.17 Using the latest population projections¹², the Muslim population in Newham is estimated to increase by 11.33% between 2022 (124,287) and 2035 (138,639). This is an estimated increase of 14,352 over 12 years.
- 1.18 If existing provision were to remain constant¹³ the currently identified inadequate provision will deteriorate further. This is clearly out of step with the London Plan and requires the Plan to be amended for it to be sound.
- 1.19 A modification to the wording of the Policy should be: -

“Development should replace the existing temporary community use with at least the equivalent amount of community floorspace, meeting the requirements of Local Plan Policy SI1.”

Q4.9(b)- The requirements relating to open space and greenspace on site N7.SA1

- 1.20 There is a shortage of publicly accessible green space in Newham with a rate of 0.72 hectares per 1,000 residents¹⁴. AelM does not object to the inclusion of open space¹⁵ and the emerging masterplan being discussed with LBN accommodates a provision of 2-hectares.
- 1.21 However, to prescribe how such open space is to be delivered¹⁶ is unjustified as is the area suggested. Consolidating the open space is not supported by any proper masterplanning evidence base and is not considered to be the most appropriate solution to create safe, secure and inclusive public spaces.
- 1.22 Any redevelopment will obviously have to consider its context and factors such as limiting overshadowing to the waterway and noise from the adjacent railway, but that renders it all the more important to ensure that the location, quantum and design of green spaces with the built form proceeds through a proper design-led approach where matters such as passive surveillance and activity in respect of open space that is to be delivered can ensure successful and sustainable spaces which can be enjoyed safely¹⁷.
- 1.23 Embracing a design-led approach to shaping the green spaces across the Site ensures they can be integrated into a holistic and coherent masterplan whilst taking full advantage of the

⁸ given the pressure that the provision of such spaces face from delivery of other uses

⁹ in the London Plan or national policy

¹⁰ , consistent with the NPPF

¹¹ see page 111 of Appendix C of Community Facilities Need Assessment (2022)

¹² published by the Office for National Statistics ('ONS') - [link](#)

¹³ as appears to be LBN's current policy position in respect of site N7.SA1

¹⁴ Newham Metropolitan Open Land Review (2024)

¹⁵ as a local park

¹⁶ or that open space be 'consolidated'

¹⁷ Design Principles set out within the Site Capacity Study – 1.8.5

Abbey Creek frontage¹⁸. Any sound policy should not eschew the opportunity to provide a variety of open spaces¹⁹ - to knit the Site into the wider network of green spaces along the River Lea, and as an extension of the Lea River Park. There may also be a further opportunity for additional green space to be provided at the point of interaction between the new mosque and surrounding uses. (**Appendix 8 & 10**).

- 1.24 The prescriptive approach of LBN would reduce the developable area by 54% which, in turn, restricts significantly the ability to maximise the Sites development potential and achieve a critical mass through a design led approach to creating a successful approach to layout, orientation, scale and massing where built form can successfully integrate into the network of public spaces being provided across the Site.
- 1.25 There is no obvious legitimacy to any methodology that has been applied by LBN in purporting to require a 2-hectare local park on the Site. We note however the application of a broadbrush approach to London Plan Policy G4²⁰. The Site Capacity Study Summary (ED003a/b) is silent on this. What is evident however is that LBN has identified the same 2-hectare requirement for the following allocations²¹: -

Site Allocation	Identified Capacity ²²	Site Area (ha)	Planning Status
N7.SA1 ²³	596	7	25/02343/PREAPP
N7.SA2 ²⁴	1,259	19.97	17/01847/OUT / 24/01731/VAR 23/02033/OUT
N17.SA1 ²⁵	7,378	84.66	20/02641/PREAPP
N2.SA1 ²⁶	4,522	21	14/01605/OUT 21/01955/PPPA 21/02811/NONMAT 22/00528/REM 22/00883/SCOPE
N2.SA4 ²⁷	2,961	18.79	

¹⁸ N7 Three Mills Vision

¹⁹ including potentially a linear park fronting the Creek

²⁰ Table 8.1 - which calls for homes to be within certain distances of parks of different size, scale and character

²¹ irrespective of the site area or identified housing capacity or the site-specific characteristics and constraint and opportunities

²² Taken from (ED003a/b)

²³ Abbey Mills

²⁴ Twelvetreves Park and Former Bromley By Bow Gasworks

²⁵ Beckton Riverside

²⁶ Silvertown Quays

²⁷ Thameside West

N3.SA1 ²⁸	784	29.8	114/00618/OUT 18/00251/REM
N4.SA4 ²⁹	697	6.66	20/01313/FUL

Table 1: Site allocations requiring a minimum of 2 hectares of 'Local Park'

- 1.26 Policy N7.SA1 is therefore unsound in this respect as it fails to respond to the Sites characteristics. For it to be sound we recommend that it responds positively to the specific sites opportunities and constraints, as follows: -

"... and providing a minimum area of 2 hectares of open space (including a local park) to service nearby residential neighbourhoods."

Q4.9(c) - The requirements relating to the establishment of a network of streets on, and routes to and from, site N7.SA1.

Q4.9(d) - The requirements relating to access and capacity improvements at West Ham and/or Abbey Road stations on site N7.SA1.

- 1.27 No observations are made in respect of Q4.9(c) and Q4.9(d).

Q4.9(e) - The layout of development illustrated on the site maps.

- 1.28 The Capacity Study³⁰ was published after the consultation stage thus depriving us more detailed representation to be made at the Regulation 19 stage.
- 1.29 The approach to height³¹, which has been informed by the Capacity Study, fails to acknowledge the substantial change currently taking place within the neighbourhood – which is elsewhere inconsistently recognised within the Characterisation Study³² and includes the developments comprising N7.SA2³³. Both deliver a series of tall buildings³⁴. The Capacity Study also recognises³⁵ the potential for intensification around West Ham station. The layout, as illustrated³⁶ fails to take advantage of the changing character. The Characterisation Study³⁷ identifies the Site of being capable of 'substantial' and 'transformative' change. There is a basic tension between this and LBN's stated aim of Policy N7³⁸. Any sound approach would identify the clear opportunity to locate much higher density elements of the development towards West Ham Station, and adjacent to the towers within the Twelvtree Park development (N7.SA2)³⁹.

²⁸ Royal Albert North

²⁹ Limmo

³⁰ ED003a & b

³¹ see also Hearing Statement 3 prepared on behalf of AelM

³² page 211

³³ 17/01847/OUT & 23/02033/OUT

³⁴ up to 38 storeys

³⁵ page 213

³⁶ including approach to the distribution of height

³⁷ Page 214

³⁸ which seeks to conserve and enhance the Three Mills neighbourhood's heritage and historic identity whilst delivering a high level of growth through a 'moderate' uplift

³⁹ which are currently under construction

- 1.30 The Site Allocation layout⁴⁰ is claimed to have been informed by the Characterisation Study⁴¹ and Tall Building Annex. However, this inappropriately and unjustifiably includes the Site within the Three Mills character area CA 02⁴². Conversely the development sites comprising N7.SA2 form their own character area⁴³. This artificially prescribes the perceived character as it shares a much greater level of commonality to N7.SA2 than the areas to the west which it is wrongly grouped with. Further, the townscape assessment undertaken within the vicinity contains fundamental inconsistencies. Sites within CA 01 are not deemed to have any context or identity linked to the heritage assets within the site i.e. the listed gas holders⁴⁴, scoring a 'zero', yet CA 02 is scored a 'one' within these criteria due to the proximity to the Listed buildings and conservation area⁴⁵.
- 1.31 There is inconsistency across the site allocation N7.SA1, Plan Policy TBZ16 and the Capacity Study in the building height ranges quoted for the Site⁴⁶. The Site Allocation map⁴⁷ claims there to be a 'Sensitive edge' to the west of the Site including on the boundary of Channelsea House supported by an approach to height where 'Massing should step down towards the west of the Site to sensitively integrate with the heritage assets.' Despite this, the Capacity Study locates the tallest element immediately adjacent to Channelsea House⁴⁸. All of this supports the principle of locating significantly higher density buildings towards West Ham Station and the south of the Site⁴⁹.
- 1.32 Overall, Policy N7.SA1 is too prescriptive regarding the height parameters being set and is therefore not positively planned. The proposed building heights, design requirements, and indicative capacities are not justified – a view that was recently taken by the Inspector when examining the Stamford Hill Area Action Plan (**Appendix 20**)⁵⁰. Here, the Inspector intends to work with the Council⁵¹, suggesting that the Site Allocations could be amended⁵².
- 1.33 Should however the Inspector consider it necessary to retain height parameters our suggested alternative wording⁵³ is as follows⁵⁴: -

*"Prevailing heights should be **no less than** between 21m and 32m (ca. 7-10 storeys) **and subject to criteria testing.***

*Opportunity to include tall building elements ~~of up to~~ **of at least** 40m (ca. 13 storeys), **or greater, subject to criteria testing.***

*Height, scale and massing of development proposals **should take account of, and seek to avoid harm to, heritage assets** ~~be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key~~*

⁴⁰ including the unjustified height limitations

⁴¹ Page 214

⁴² Page 93

⁴³ CA 01

⁴⁴ Page 94

⁴⁵ despite these elements sitting outside of our Site boundary

⁴⁶ N7.SA1 guiding that building heights should be range between 9 - 21m (ca. 3-7 storeys) with taller buildings up to 40m (ca. 13 storeys); TBZ16 (Abbey Mills) guiding that prevailing heights should be between 21m and 32m (ca. 7-10 storeys); Capacity Study guiding that the Site is suitable for tall buildings between 6-12 storeys.

⁴⁷ and associated wording

⁴⁸ Page 51

⁴⁹ See response to Q4.9

⁵⁰ SHAAP/ED16 - Post Hearings Letter – Potential Main Modifications Letter (8 October 2025)

⁵¹ London Borough of Hackney

⁵² to require development to be of "an appropriate building height" and to remove the housing unit minima

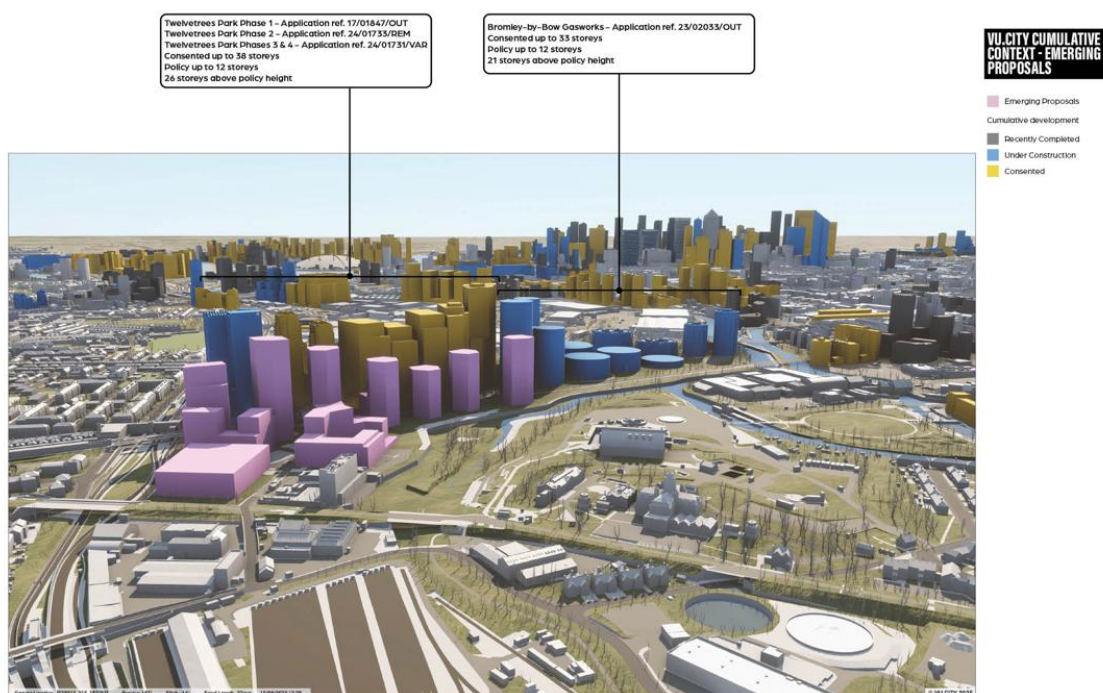
⁵³ See also Hearing Statement (Matter 3) – Q3.2

⁵⁴ And to reflect the approach taken within Policy D4

views, including the Abbey Mills Pumping Station, **and key views identified in relevant adopted conservation area appraisals.**

Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid **harmful** overshadowing impact on watercourses."

- 1.34 The layout presented within the Capacity Study⁵⁵ suggests a tightly packed series of buildings based around a series of streets with an arrangement that is 'urban' in its manifestation⁵⁶. The Site's boundary conditions including its relationship with the railway, Three Mills and industrial uses to the north mean that it does not share an immediate relationship with any context that shares similar characteristics to the Capacity Study layout. The landscaped nature of the Site alongside its relationship with the waterway suggests a landscape driven approach may be a more appropriate solution for the Site's arrangement. This would facilitate greater building separation and increased spaces between buildings that could be more fluid whilst facilitating additional height.
- 1.35 We have undertaken our own studies⁵⁷ (**Appendix 6-7**) and have compared these against LBN's own approach to capacity (**Appendix 5**). Our own assessment is based upon technical analysis, including a HTVIA⁵⁸ and consideration of the Site constraints (**Appendix 12-19**).



⁵⁵ Which are said to have been informed by the Design Principles within the Characterisation Study

⁵⁶ Page 51

⁵⁷ Discussed at the pre-application meeting

⁵⁸ Further studies have also informed our approach, including DLSL, wind and microclimate, and landscape masterplanning.

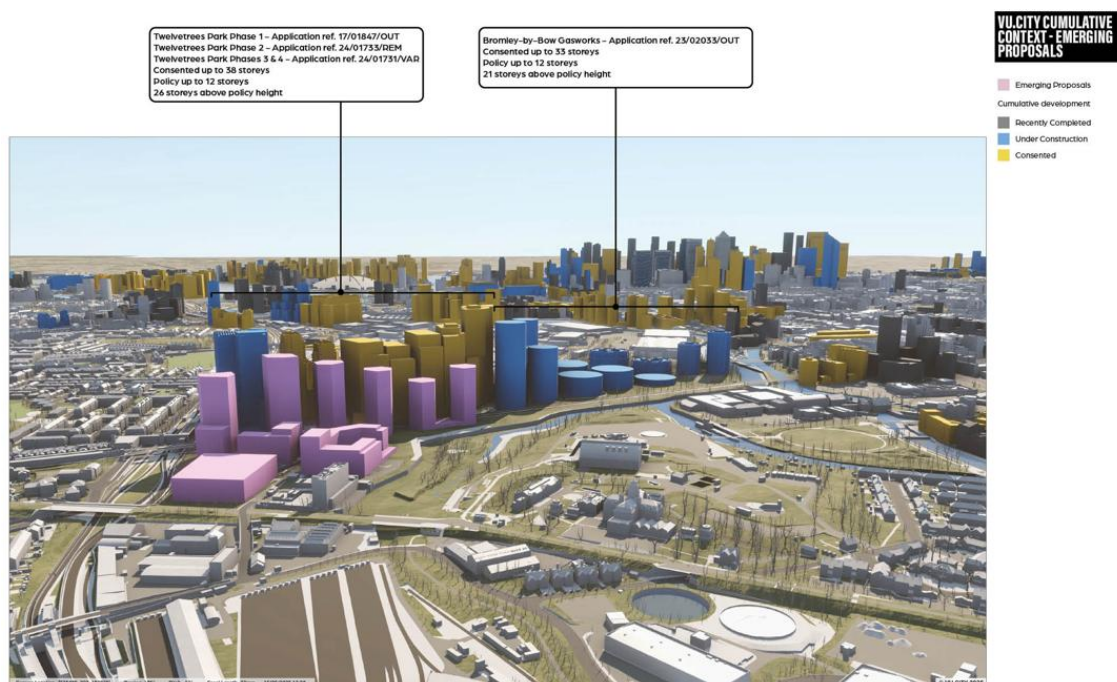


Figure 1: AelM Capacity Study (Cumulative Context)⁵⁹

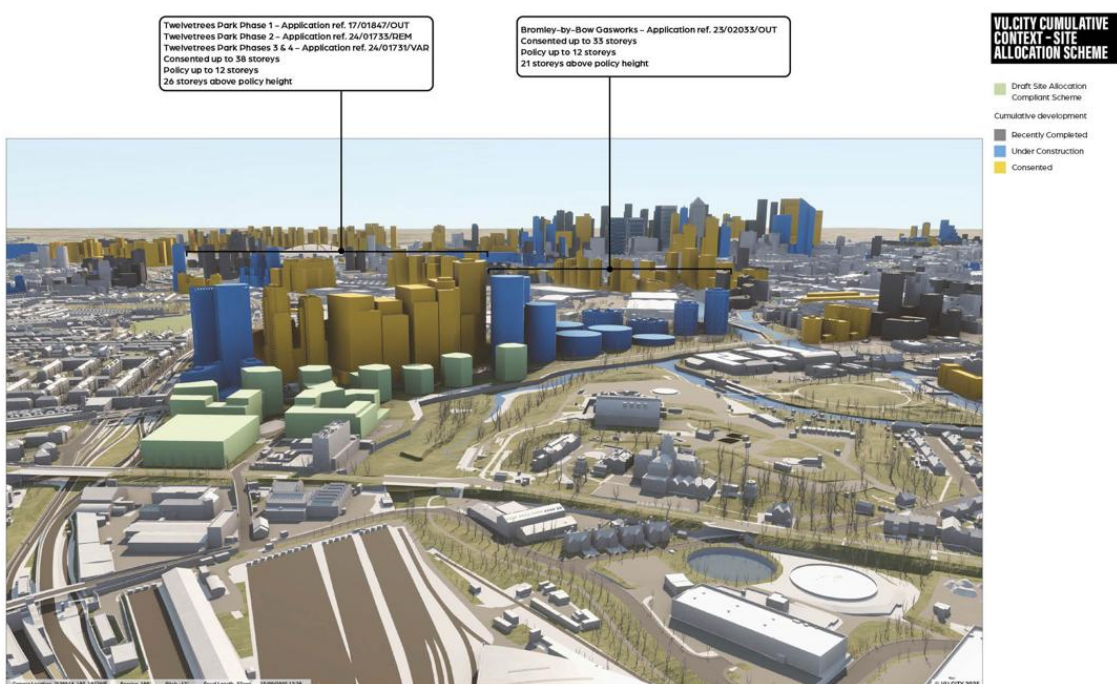


Figure 2: LBN Site Capacity Study (Cumulative Context)⁶⁰

1.36 Serious concerns are raised regarding the suggested positioning of the community facilities (N7.SA1– page 455⁶¹). Firstly⁶², it cannot be mandatory to provide a bridge in the absence of a legal requirement of the adjoining landowners to facilitate such a connection. Secondly,

⁵⁹ Hearing Statement Appendices 6 & 7

⁶⁰ Hearing Statement Appendix 5

⁶¹ which the Plan claims 'should be located to the southeast of the Site in proximity to West Ham Station and as part of Twelvvetrees Local Centre

⁶² and viability matters aside

the policy⁶³, as drafted calls for consideration of 'all types of community facilities'. Whilst a degree of choice is positive, this cannot be at the expense of a replacement faith-based facility. There is no need to request that 'all types' of community facilities are considered and doing so places doubt on the requirement to replace the faith-based use for which there is well documented need⁶⁴. Thirdly, it is neither practical nor desirable to build 'above' a mosque⁶⁵ as the entire space above the facility is considered to be part of it.

1.37 Policy N7.SA1 is fundamentally unsound and we suggest the following amendments: -

- to require a replacement faith-based use of no less floorspace than the existing⁶⁶.
- to allow for greater flexibility in the location of the faith-based use.
- to express a 'desire' to link the Site to the Twelvetreets Park development.
- to be far less prescriptive around capping building heights.
- to recognise a minimum capacity for housing delivery.

Q4.9(g) - The assumption that around 600 homes will be built on N7.SA1 between 2028 and 2033.

- 1.38 600 homes will fail to realise Policy N7⁶⁷. We disagree with the indicative capacity provided and maintain that identifying a 'minimum' capacity would help make the Plan sound⁶⁸.
- 1.39 AelM has presented a proposed masterplan⁶⁹ for the Site (**Appendix 6-7**). This identifies a development potential of at least 1,650 units.
- 1.40 LBN [EB058, paragraph 3.1.3] suggests that the assessment of capacity of individual sites can be adjusted at the application stage following "further detailed site design work" but suggesting that the Site's capacity is 600 units is unsound.
- 1.41 Policy N7.SA1 should be modified to adopt a positive stance regarding housing growth and delivery from this sustainably located brownfield site. Given the existence of the masterplan, the reassessment described in EB058 should be brought forward to the plan-making stage. This will strengthen LBN's land supply significantly, addressing a key concern regarding the Plan's soundness.
- 1.42 The Site is under predominantly single ownership. Pre-application discussions are ongoing⁷⁰. We anticipate a planning application seeking a higher density than currently envisaged will be delivered between 2028 – 2033, with a modest build out rate. This would make a significant contribution to the Council's 5-year housing supply.

⁶³ Site allocation boxes setting out development principles, design principles, infrastructure requirements and information about phasing and implementation

⁶⁴ see page 111 of Appendix C of Community Facilities Need Assessment (2022)

⁶⁵ which would be necessary here to deliver density in this location

⁶⁶ see response to Q4.9(a)

⁶⁷ Which calls for high level of growth to be delivered through the transformation of N7.SA1 Abbey Mills

⁶⁸ particularly in the context of the flawed housing targets

⁶⁹ Whittam Cox Architects

⁷⁰ with LBN and shortly the GLA

Hearing Statement Appendices

Hearing Statement prepared on behalf of the
Anjuman-e-Islahul-Muslimeen

London Borough of Newham Local Plan Submission Stage (Regulation 22)

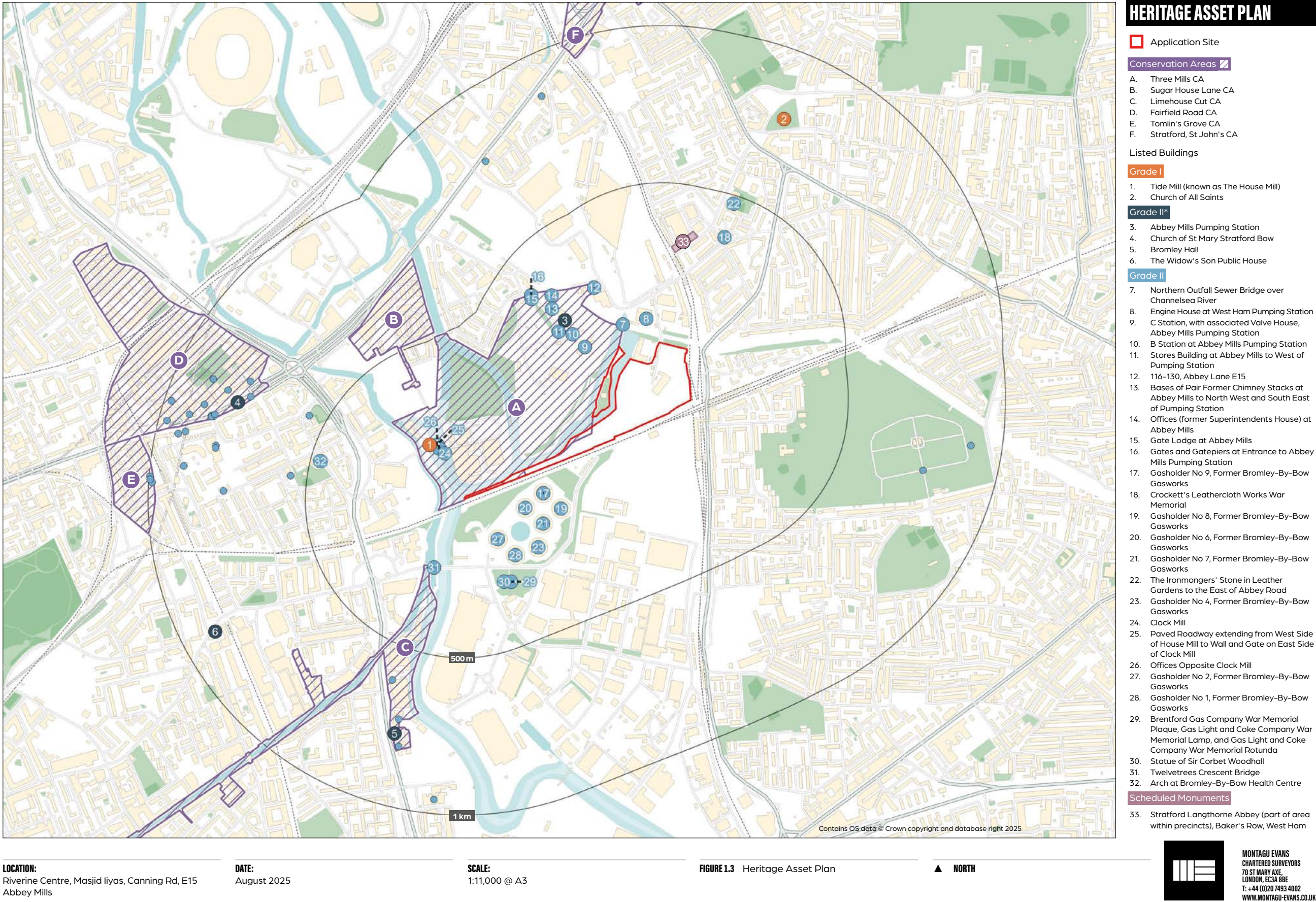
Appendix 01

Site Location Aerial



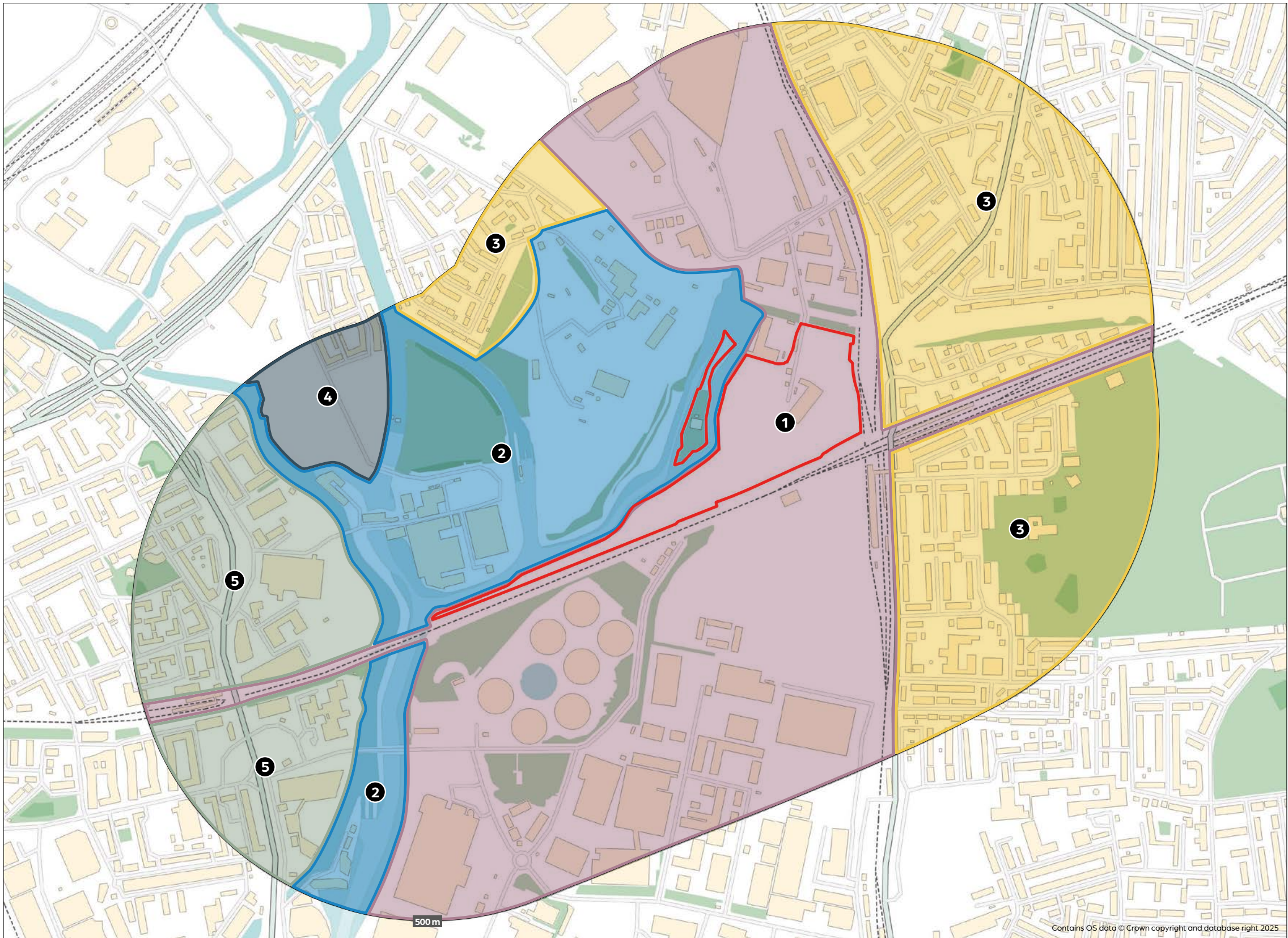
Appendix 02

Heritage Asset Plan



Appendix 03

Townscape Character Plan



TOWNSCAPE
CHARACTER AREA PLAN

- Application Site
- TCA 1:
Industrial and rail network
- TCA 2:
Riverine network: waterways,
mills and pumping stations
- TCA 3:
20th Century residential
- TCA 4:
Sugar House Island
- TCA 5:
Bromley-by-Bow

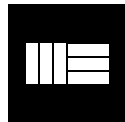
LOCATION:
Riverine Centre, Masjid Iyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
1:6,500 @ A3

FIGURE 2.1 Townscape Character Area Plan

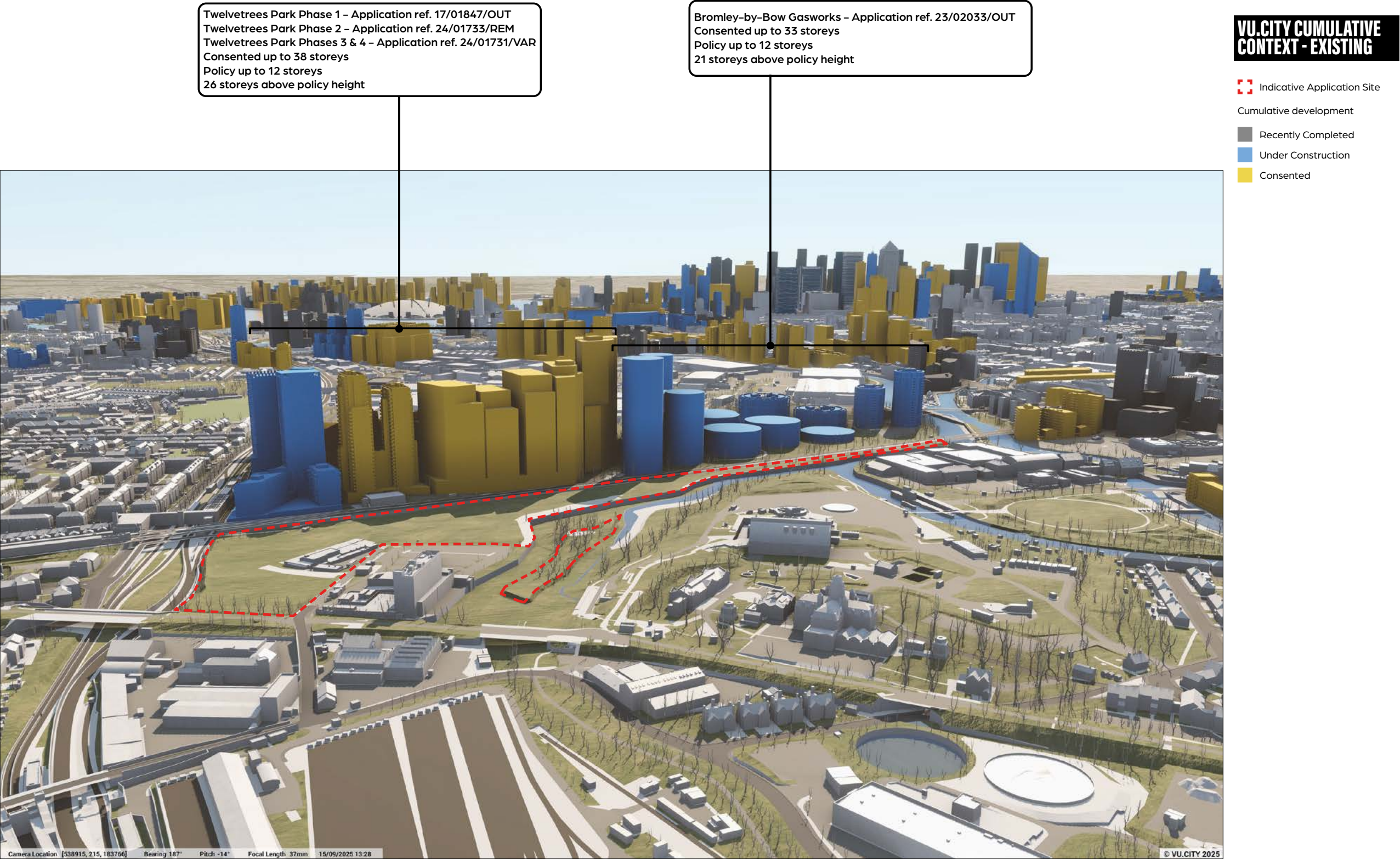
▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 04

Vu.City Cumulative Context - Existing Oblique Aerial



LOCATION:
Riverine Centre, Masjid Ilyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

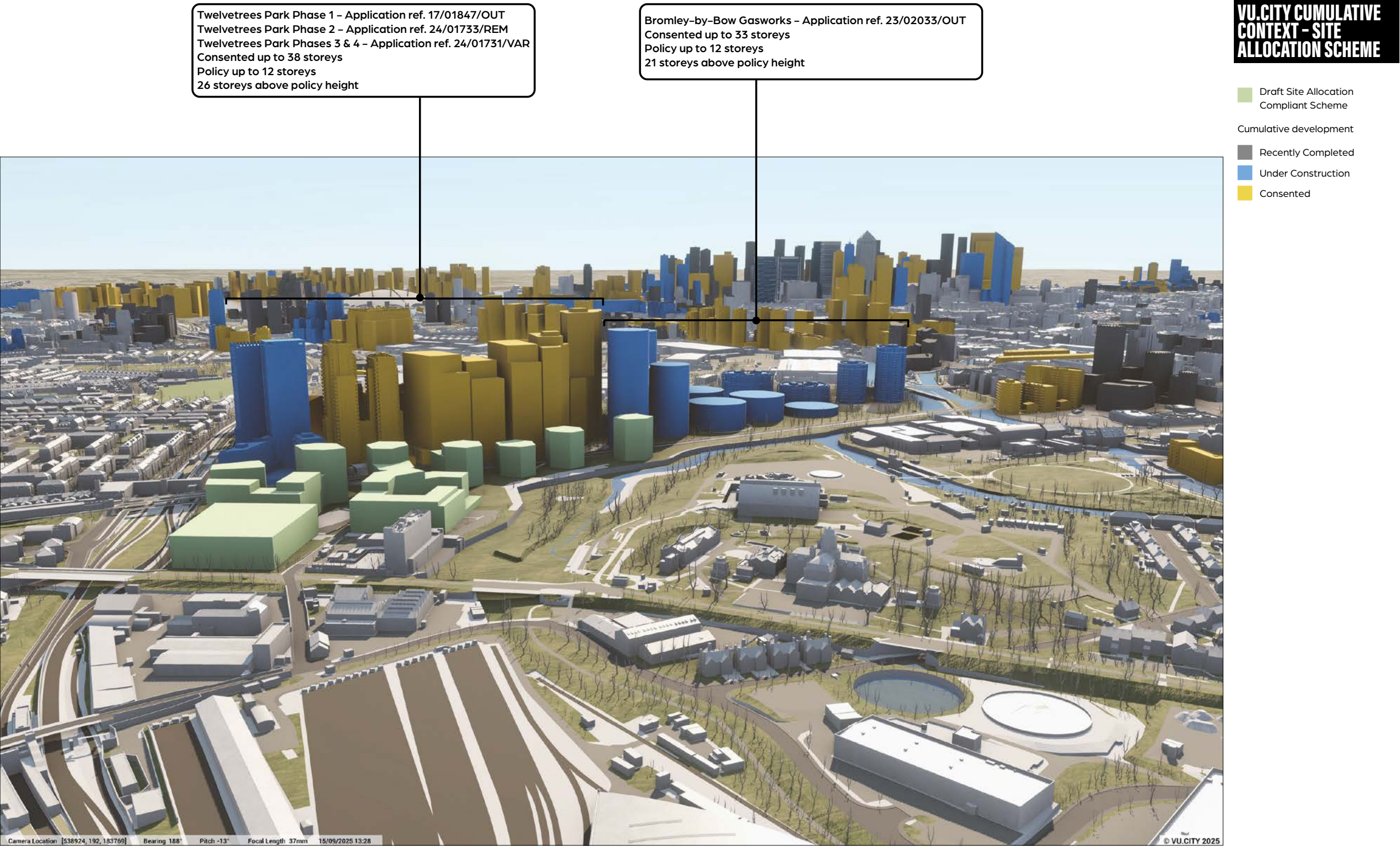
SCALE:
NOT TO SCALE

FIGURE 3.1 Southerly VU.CITY oblique aerial view of established and emerging tall building context. Blue = under construction; yellow = consented; black = completed

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 05

Vu.City Cumulative Context - Site Allocation Scheme Oblique Aerial



LOCATION:
Riverine Centre, Masjid Iiyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

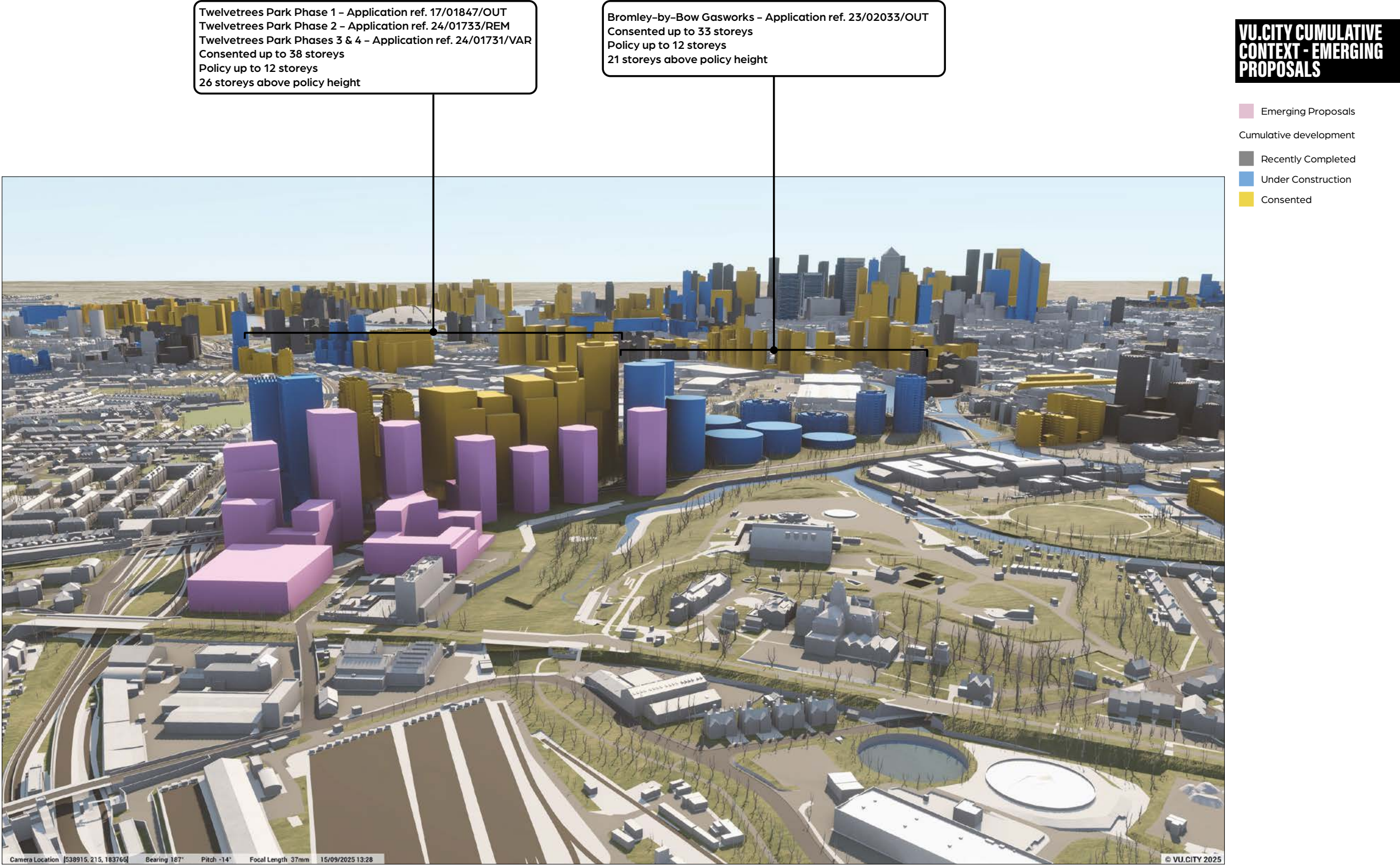
SCALE:
NOT TO SCALE

FIGURE 4.4 Southerly VU.CITY oblique aerial view of established and emerging tall building context, including a draft site allocation compliant scheme massing in green. Blue = under construction; yellow = consented; black = completed

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 06

Vu.City Cumulative Context - Emerging Proposals Iteration 01 Oblique Aerial



LOCATION:
Rivierine Centre, Masjid Iiyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

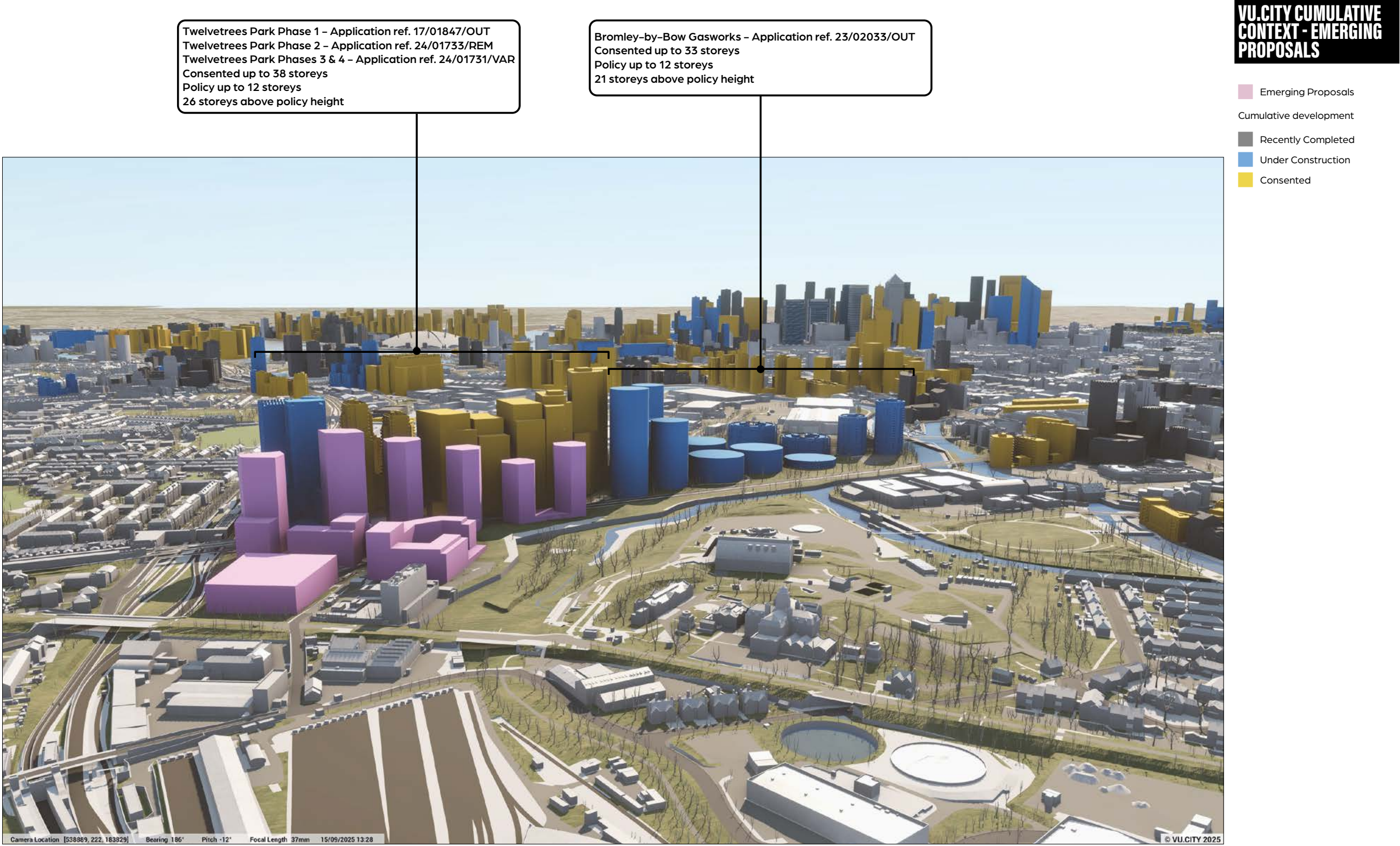
SCALE:
NOT TO SCALE

FIGURE 5.2 Southerly VU.CITY oblique aerial view of established and emerging tall building context, including the emerging proposals in mauve.
Blue = under construction; yellow = consented; black = completed

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8DE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 07

Vu.City Cumulative Context - Emerging Proposals Iteration 02 Oblique Aerial



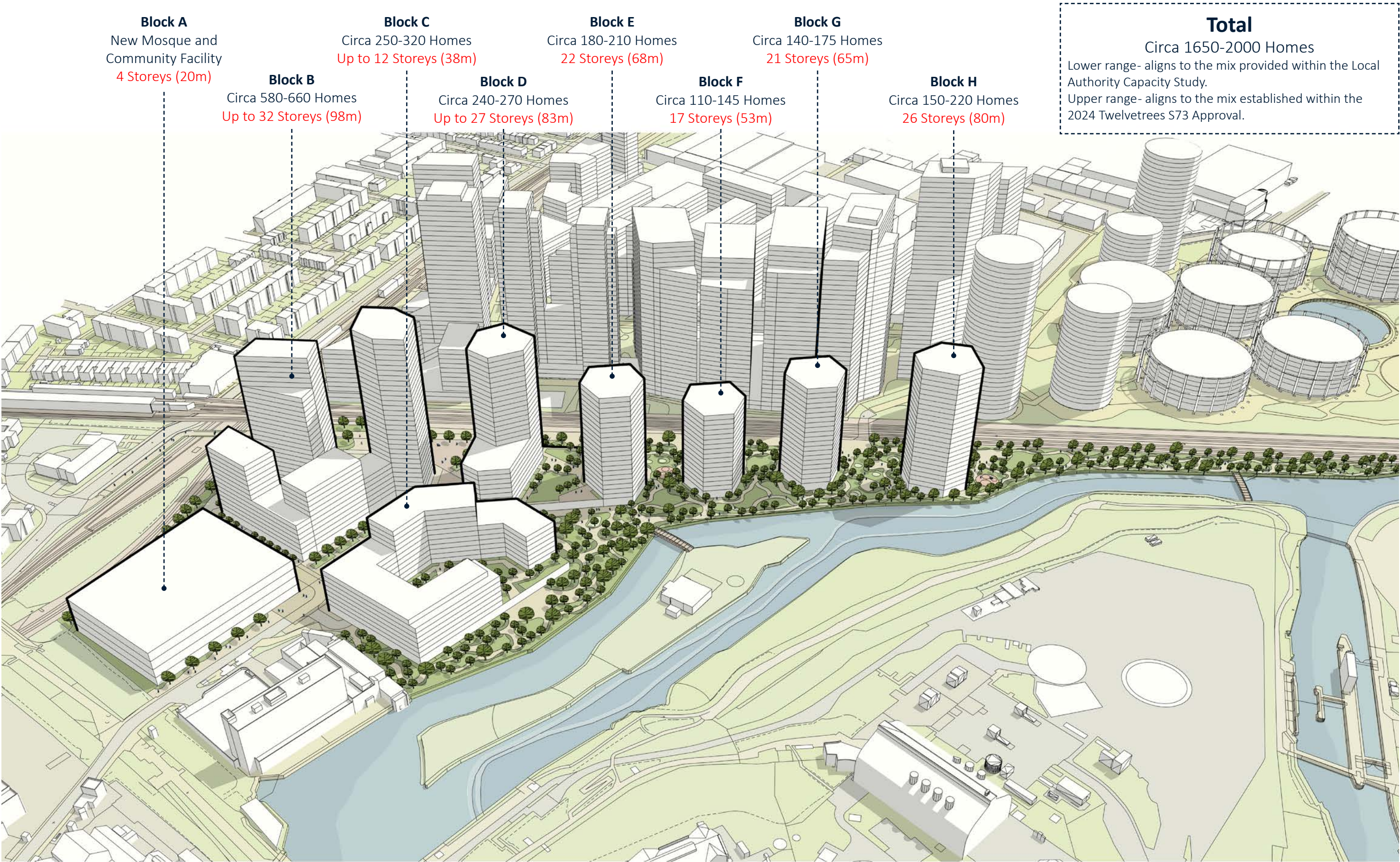
Appendix 08

Emerging Proposals Iteration 01 Illustrative Masterplan



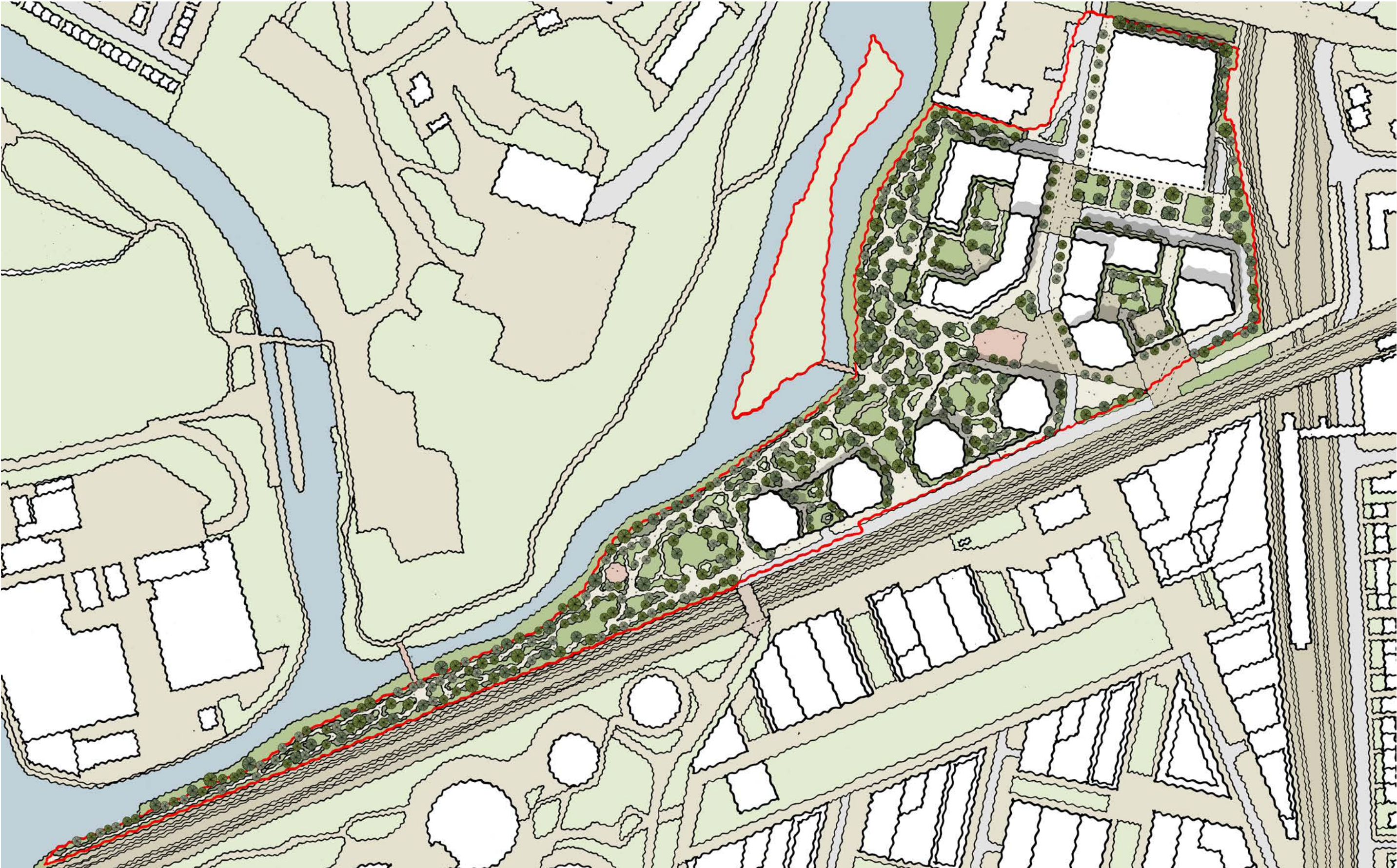
Appendix 09

Emerging Proposals Iteration 01 Illustrative Axonometric



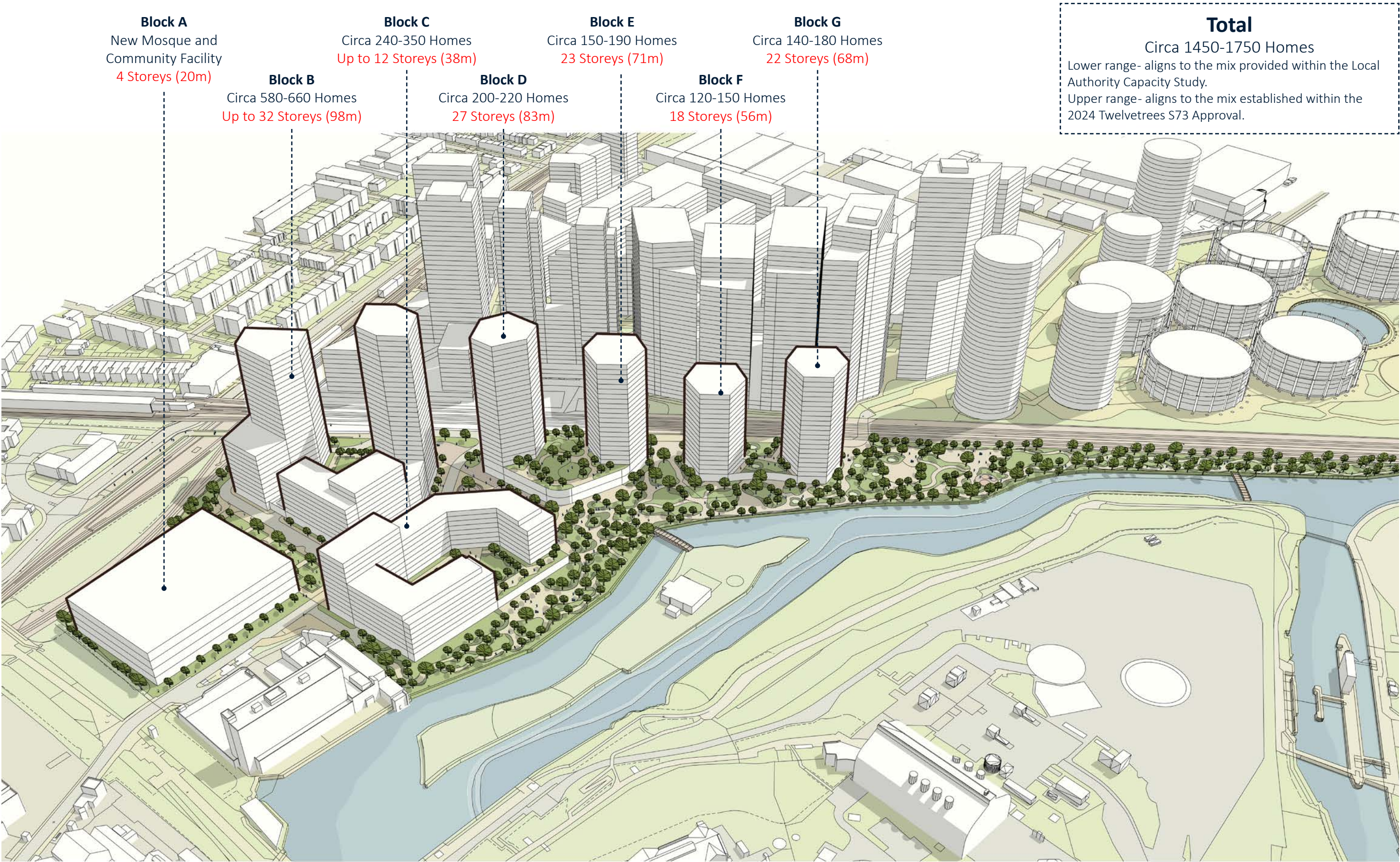
Appendix 10

Emerging Proposals Iteration 02 Illustrative Axonometric



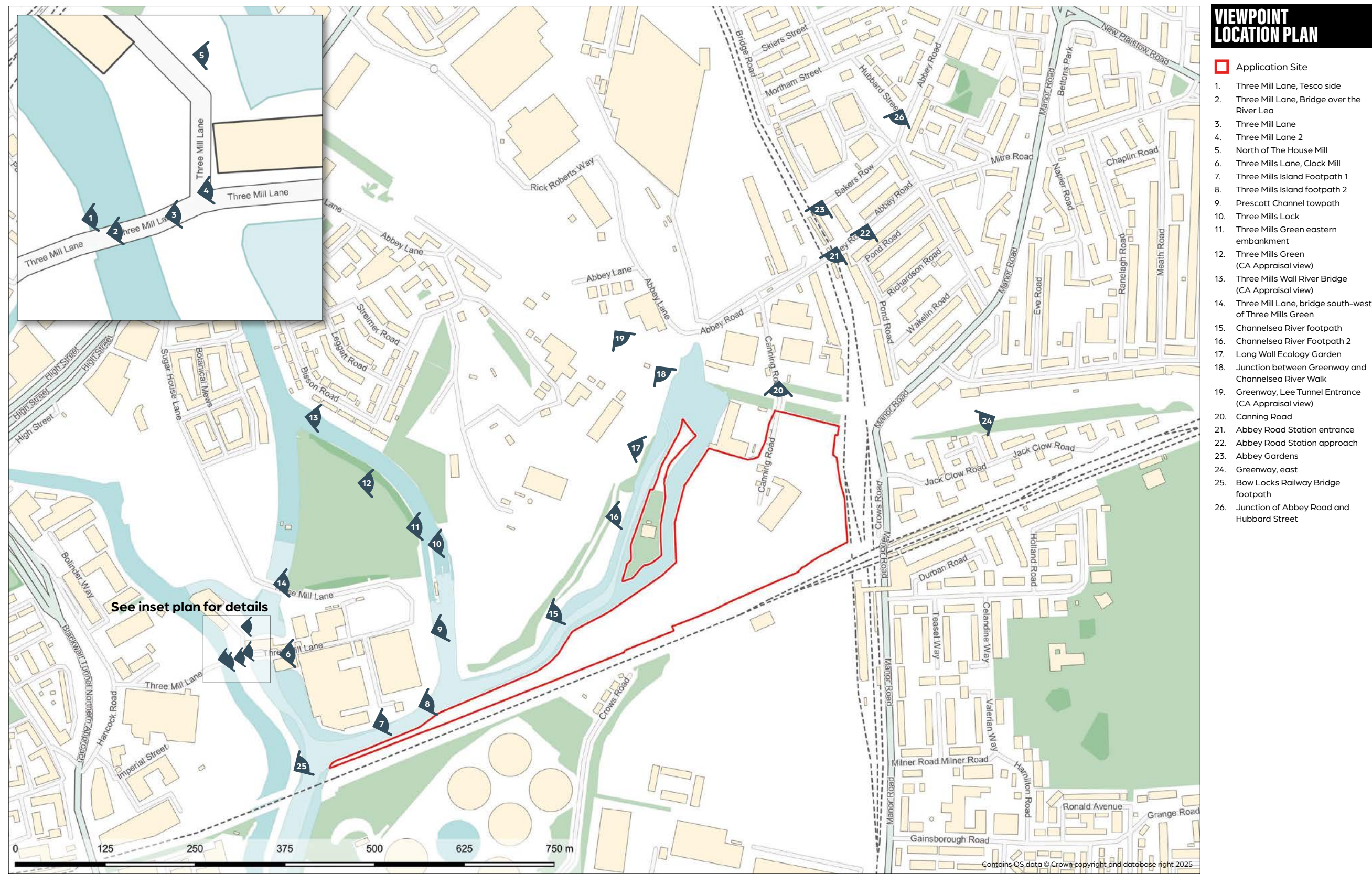
Appendix 11

Emerging Proposals Iteration 02 Illustrative Axonometric



Appendix 12

Viewpoint Location Plan



LOCATION:
Riverine Centre, Masjid Iyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
1:5,000 @ A3

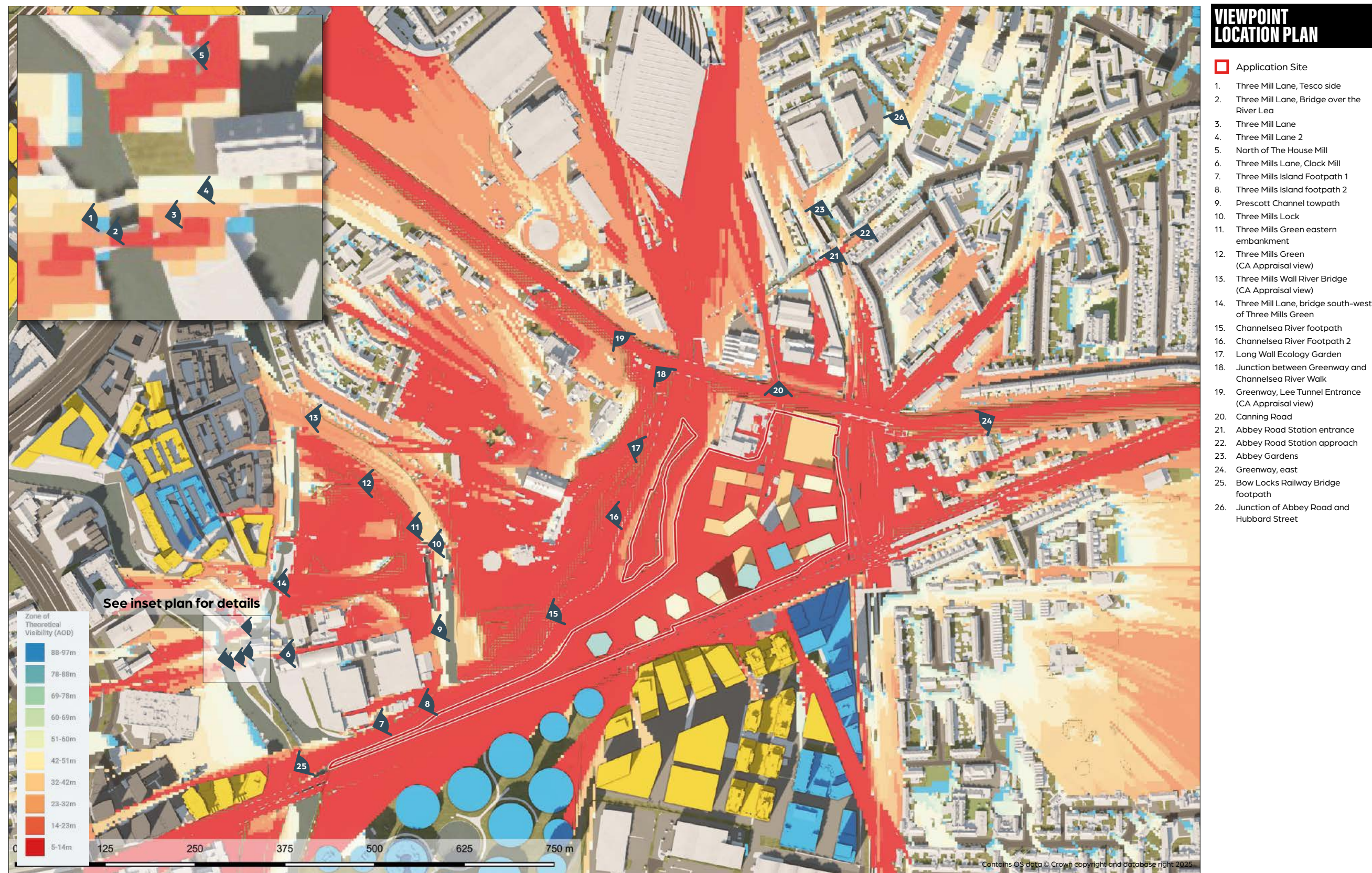
FIGURE 5.3 View Location Plan

▲ NORTH

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 13

Viewpoint Location Plan with ZTV Overlay



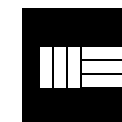
LOCATION:
Riverine Centre, Masjid Iyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
1:5,000 @ A3

FIGURE 5.4 View Location Plan with ZTV overlay

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

Appendix 14

View 3 - Three Mill Lane



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 15

View 9 - Prescott Channel towpath



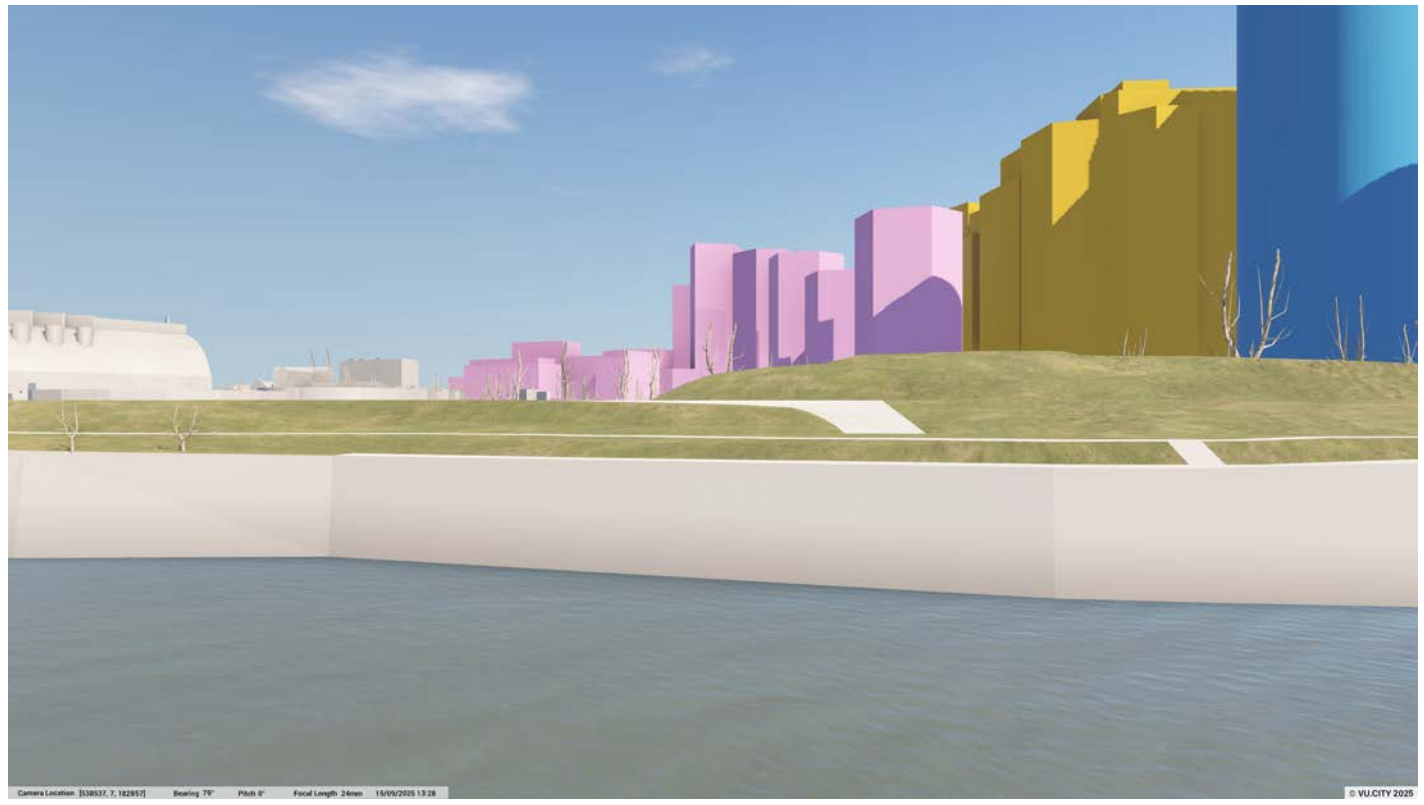
CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 16

View 11 - Three Mills Green eastern embankment



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 17

View 13 - Three Mills Wall River Bridge (CA Appraisal view)



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 18

View 19 - Greenway, Lee Tunnel Entrance (CA Appraisal view)



CUMULATIVE BASELINE



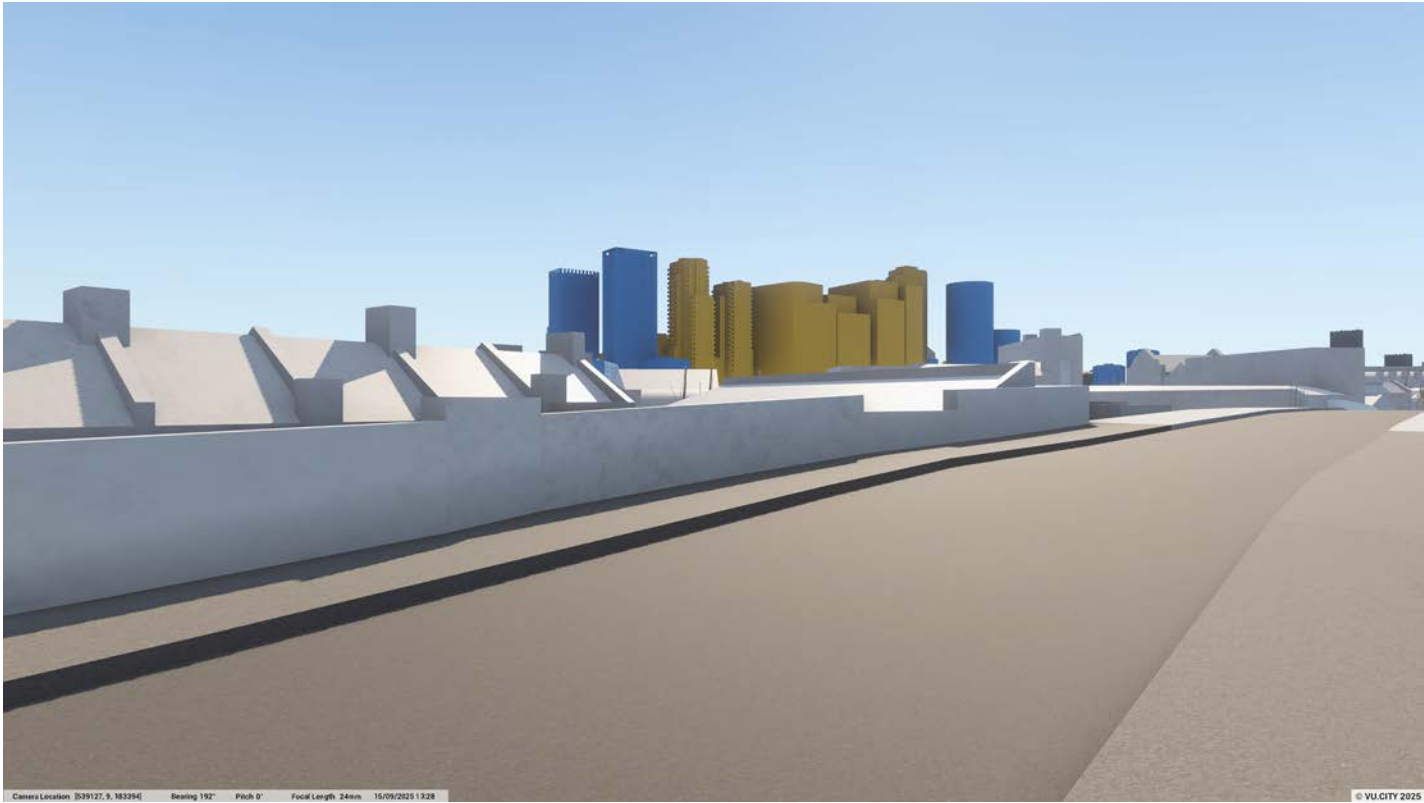
CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



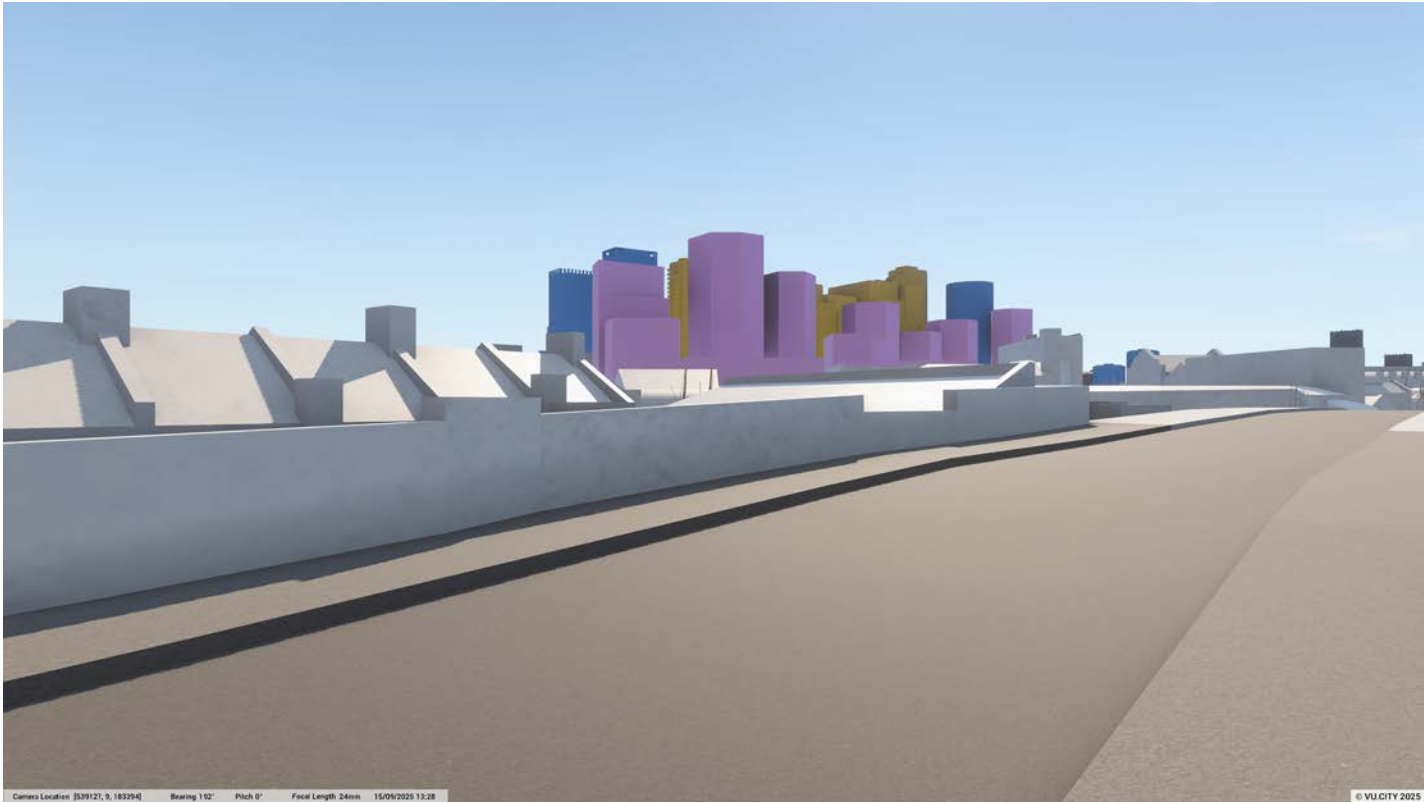
CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 19

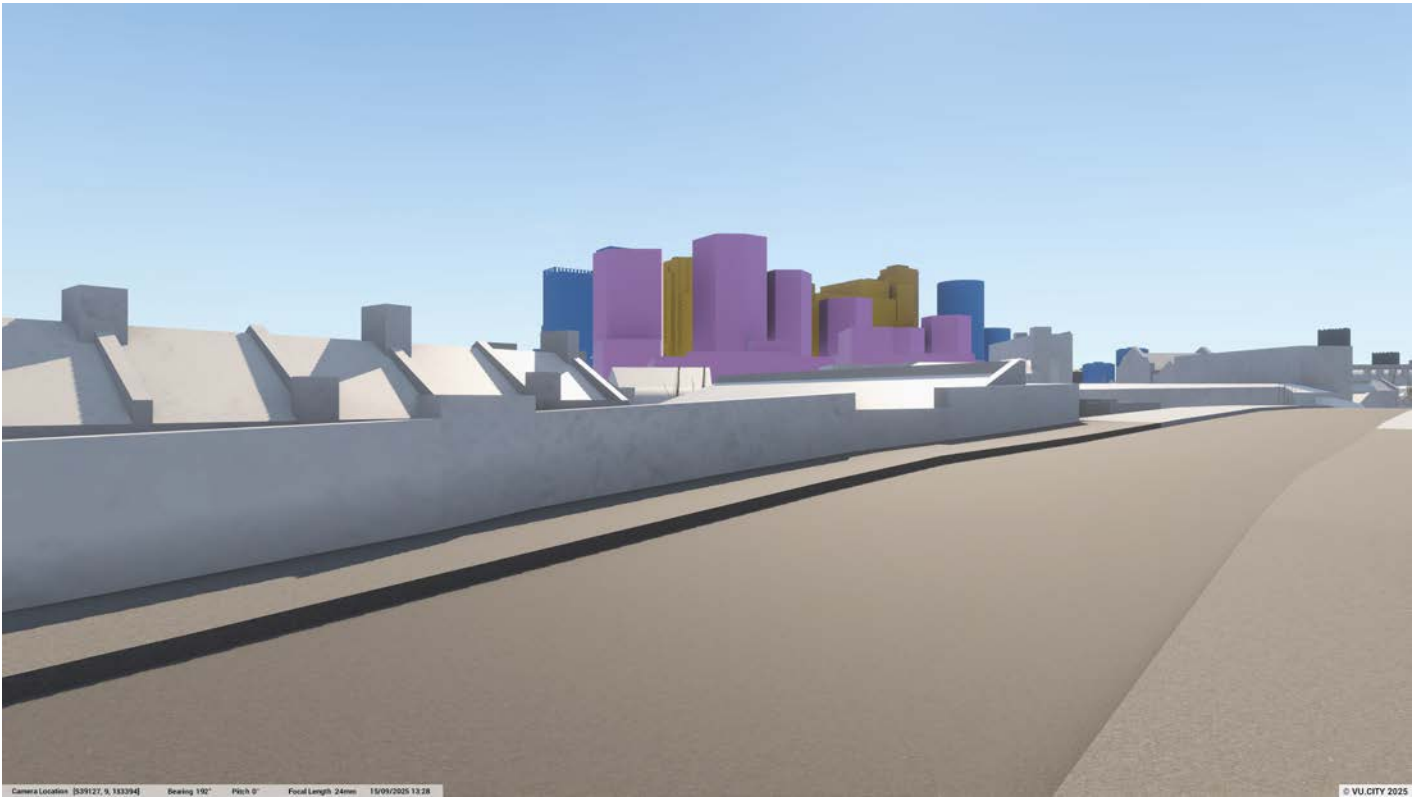
View 22 - Abbey Road Station approach



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02



progressive by design

whittamcox.com

WCEC Group Ltd is trading as Whittam Cox Architects
© WCEC Group Limited. This document is copyright and shall not be reproduced
or used for any other purpose without the written permission of the authors.

EXAMINATION OF THE STAMFORD HILL AREA ACTION PLAN

Inspector: S Dean MA MRTPI

Programme Officer: Louise St John Howe, PO Services, PO Box 10965, Sudbury, Suffolk CO10 3BF

Phone: 07789-486419

Email: louise@poservices.co.uk

Examination web pages: <https://hackney.gov.uk/stamford-hill-aap-examination>

8 October 2025

London Borough of Hackney
Seonaid Carr
Strategic Planning Manager

POST HEARINGS LETTER – POTENTIAL MAIN MODIFICATIONS

Dear Ms Carr,

Introduction

1. As I indicated at the conclusion of the examination hearings on 10 September 2025, I am writing to set out my thoughts on the Plan at this stage, and the way forward for the examination. My comments are based on all that I have read, heard and seen to date. However, I emphasise that the examination is not yet concluded and consultation on potential Main Modifications is still to take place. Therefore, these comments are without prejudice to my final conclusions on the Plan.
2. During the hearing sessions a number of potential Main Modifications to address matters of soundness were discussed. I understand that the Council has kept a running list of all of these and is currently working on draft wording. Subject to these the Plan could be found sound and legally compliant.

Potential Main Modifications*Policy AAP2: Residential Conversion of Houses to Flats*

3. This policy seeks to ensure that the residential conversions of houses to flats can continue to be supported, consistent with policy LP19 of the Hackney Local Plan, but that such conversions protect existing family-housing stock. The policy is unsound, and likely not effective in achieving those aims given its requirement for the 4+ bed family unit to be provided on the ground floor. The potential impact of this requirement on accessibility also means that the policy may not be positively prepared.

4. This could be addressed through an amendment to the wording of Policy AAP2, to ensure that a 4+ bed family unit is provided within the converted property, that it is prioritised on the ground floor and has access to private amenity space. This would be consistent with policy LP19 of the adopted Local Plan and would also be consistent with the Growing up in Hackney SPD (document ED6.7).

Policy AAP3: Residential Extensions and Alterations

5. Policy AAP3 seeks to allow the increase in size of existing homes to meet the need for larger family homes in this part of Hackney. To do this, it sets design and quality expectations and requirements around roof extensions in the form of front dormers or an additional floor (part A), other extensions including rear dormers, extensions or basements (part B), and combinations thereof (part C). Each part has numbered criteria within it. The policy complements borough-wide design policies and townscape protection aims set out in the adopted Hackney Local Plan, such as policies LP1, LP2 and LP17.
6. The policy then seeks to balance the provision of extensions for which there is pressure in the area, with the townscape protection requirements of the adopted Hackney Local Plan.
7. I accept that it is not possible to allow such extensions to any and all properties within the Plan area, given the need to balance this policy aim with those others set out. Whilst there are some homes which could not be extended through the application of the policy, it is positively prepared and justified as a whole.
8. The wording of criteria 5 to part A in combination with the supporting text deferring the location and detail of the “Identified Streets” to the Stamford Hill Design Guide renders the policy unsound as it is not justified and not effective. That Design Guide is not a development plan document, and the policy, as written effectively attempts to give that status to a supplementary planning document.
9. Despite this, the policy does strike the appropriate balance between allowing larger extensions and alterations but protecting the townscape, character and appearance of the area consistent with other policies in the adopted Hackney Local Plan. This approach is supported by the evidence of the Council.
10. A potential Main Modification to this policy would reword criteria 5 of part A to require such a site to be located on a street where buildings on both sides have front roof extensions to the extent that the character of the townscape is already altered. This approach maintains the appropriate separation between the Plan and the Draft Design Guide. It also retains flexibility in allowing space for the making of a case for a proposal and the exercise of planning judgement by the decision maker. In any event, criteria 7 of part A still requires the decision maker to *have regard* to the Design Guide.
11. A potential Main Modification in this manner would still allow the policy to function in the same way, with larger upward extensions being permissible, having regard to the character, appearance and level of existing alteration to streets around any given application site, and still subject to normal development management procedures.

Allocations

12. The site allocations set out in the Plan seek to deliver on the vision and objectives of the Plan and make a contribution to meeting the housing, retail and employment needs of the City and Hackney, set out in the overarching strategic policy PP4 and policy LP12 of the adopted Hackney Local Plan.
13. Like other policies in the plan, the allocations seek to balance the meeting of housing, retail and employment needs with other requirements and considerations of the adopted Hackney Local Plan and the London Plan.
14. Whilst the selection of the proposed site allocations appears to be justified by the evidence before me, the level of detail within each allocation (be that indicative capacity, building heights, or design detail) is neither justified nor positively prepared, and as such, the proposed allocations would not be effective.
15. The combination of specified building heights, unit numbers and terminology throughout the allocations does not demonstrate that the allocations are positively prepared, or that the allocations would be flexible enough to accommodate needs not anticipated in the plan or to enable a response to changes in economic circumstances. The wording of the proposed allocations does not explicitly cap the number of units on any given allocation, but the allocations would not be effective in their current form.
16. London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites, including site-allocations. London Plan Policy H1 also requires the potential for housing delivery on all suitable and available brownfield sites to be optimised.
17. Whilst there is design evidence from the Council, notably document ED3.6 Site Allocation Site Capacity, this evidence does not justify the detail found in the allocations. It does not take an iterative approach, nor does it test or explore alternative building heights or site capacities either above or below those set out in the allocations, so is not clear evidence of a design-led approach which properly assesses alternatives. Further, a number of the allocations include very detailed design and appearance requirements which again, are not wholly justified by the evidence.
18. Given that, the building heights, detailed design requirements and indicative capacities within the policies are not justified.
19. Whilst the Council has carried out a viability assessment of the allocations in document EB14, this is, as the Council accepts, now of some age, and the financial context to development has changed significantly. Given the range of other, more recent, viability evidence before me on the site allocations, the indicative number of units and building heights are no longer justified by the viability evidence of the Council nor can they be considered to be positively prepared in that respect.

20. Potential Main Modifications should be prepared for each allocation, and for the supporting text which address these matters. Given the other policies in the adopted Hackney Local Plan, allocations could require development to be of “an appropriate building height”.
21. The Council will need to consider carefully how the wording of the allocations can be altered to ensure that the proposed allocations do not deliver less than the number of homes needed to meet the housing target set in the Hackney Local Plan, by complementing small site delivery and delivery on the MH1 Woodberry Down allocation in the adopted Hackney Local Plan. The aim of policy LP12 of the adopted Hackney Local Plan is to secure the maximum amount of housing based on the identified need. For the same reasons that the evidence does not justify the inclusion of indicative capacities, the same evidence does not justify housing unit minima on each site. The Plan could however encourage applicants to have regard to the design and capacity work undertaken in document ED3.6.
22. These potential Main Modifications will need references to the policy approach to tall buildings in the London Plan or taller buildings in the adopted Hackney Local Plan as necessary.
23. Potential Main Modifications should also consider removing the unjustified detailed design requirements set out for various sites and thought should be given to whether or not the reference to sites being safeguarded for Crossrail 2 is required for the allocation policies to be sound. The Council should also carefully consider whether or not any existing certificates of lawfulness, or indeed, permitted changes under the Use Classes Order may affect the requirements for each allocation.

Other potential Main Modifications

24. Other potential Main Modifications were discussed at the hearings. Essentially these were identified by the Council in Appendix 2 of document SD12, summarised in document ED3.1, and through later agreement with the Environment Agency, Statements of Common Ground with Historic England and Transport for London.
25. These relate to Policy AAP4: Local Enterprise and the Economy, Policy AAP5: Social, Community and Cultural Infrastructure, Policy AAP6: Design and Historic Environment, Policy AAP7: Public Realm, and Policy AAP8: Green Infrastructure.

Process and next steps

26. We will now work together to agree the final wording of the potential Main Modifications which will be consulted upon in accordance with the Council’s Statement of Community Involvement. Changes to each policy and proposed allocation, including to the reasoned justification should be provided as a single potential Main Modification. These must include the changes addressed above, and any consequential changes to other parts of the policies or Plan. For ease, I have attached the standard Planning Inspectorate template for Main Modifications.

27. Further advice on Main Modifications and sustainability appraisal, including on consultation is provided in the Procedure Guide for Local Plan Examinations. It is for the Council to consider whether or not the sustainability appraisal and Habitats Regulation Assessment requires to be revisited.
28. Ultimately, it should be made clear that the consultation is only about the proposed Main Modifications and not about other aspects of the plan and that the Main Modifications are put forward without prejudice to my final conclusions.
29. The general expectation is that issues raised on the consultation of the draft potential Main Modifications will be considered through the written representations process and further hearing sessions will only be scheduled exceptionally.

Conclusion

30. To reiterate, the views I have expressed in the hearing sessions and in this letter on potential Main Modifications and any necessary related policies map changes are based on the evidence before me, including the discussion that took place at the hearing sessions.
31. However, my final conclusions on soundness and legal compliance will be provided in the report which I will produce after the consultation on the potential Main Modifications has been completed. In reaching my conclusions, I will take into account any representations made in response to the consultation. Consequently, the views I expressed during the hearing sessions and in this letter about soundness and the potential Main Modifications which may be necessary to achieve a sound plan could alter following the consultation process.
32. Please publish this letter on the Examination website. At this stage I am not inviting any comments about the contents of this letter.

Yours sincerely,

S Dean

INSPECTOR