

EXAMINATION IN PUBLIC OF NEWHAM LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF LONDON INTERNATIONAL EXHIBITION CENTRE PLC (EXCEL) AND DESIGNED IN PARTNERSHIP WITH MOUNT ANVIL

06/11/2025

Matter 4 QUESTION 4.4 AND Question 4.5

1. Introduction

- 1.1 This Hearing Statement has been prepared by DP9 Ltd on behalf of London International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil in response to Matter 4 (M4. 'Neighbourhood policies and allocations'), issued by the Inspector on 9th October 2025.
- 1.2 Excel are the owners of the site referred to as Site Allocation N2.SA5 'Excel Western Entrance' in the draft London Borough of Newham (LBN) Local Plan (the Site), to which this Hearing Statement relates.
- 1.3 This Hearing Statement is submitted further to our earlier representations made at the 'Call for Sites' stage and during the Regulation 18 and Regulation 19 stages of the draft new Local Plan.
- 1.4 In addition, this Hearing Statement also reiterates the request in our previous representations for the removal of Excel's land ownership from the boundary of Site Allocation N3.SA1 ('Royal Albert Dock').
- 1.5 This Hearing Statement builds upon the previously submitted representations and seeks modifications necessary to ensure that the policies are robust, evidence-based, and consistent with both national and regional policy frameworks.

2. Inspector's Questions

- 2.1 In particular, this Hearing Statement seeks to address the following aspects of Question 4.4 in the letter issued by the Inspector on 9th October 2025, particularly parts C and H which are set out in more detail below.



Question 4.4: Are policies N2, N2.SA1, N2.SA2, N2.SA3, N2.SA4 and N2.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Victoria neighbourhood?

c) The requirements relating to tall buildings.

h) The assumption that around 140 homes will be built on N2.SA5 between 2028 and 2038.

2.2 In addition, this Hearing Statement comments on the Topic Paper of the Site Capacity Study, which is a newly released part of the evidence base not published at Reg 18 or Reg 19 stage, that has been used as the direct basis to underline the reasons for the resulting Site Allocations. Our primary concern is that the Capacity Testing undertaken in relation to the Site, significantly underplays the reality of the number of homes coming forwards on the Site through the planning process, limits the potential location of those homes to non-prime areas or areas outside of our development control, and risks constraining the delivery potential of the Site.

N2.SA5 Excel Western Entrance: Map (page 394)

2.3 We fully support the principle of the Site being given a new Site Allocation status in the new Local Plan. However, we are very concerned that the graphic representation of the 'Opportunity for Green Space' on the Site Allocation Map (page 394) is too extensive and would prevent any reconfiguration of green space by fixing and limiting the locations of that green space. Furthermore, the current representation of 'Green Space' directly conflicts with the draft Site Allocation, which clearly states that "*Royal Victoria Square to be reconfigured at the east of the site... as a consolidated open space.*" This inconsistency undermines the clarity and intent of the draft policy and must be addressed to ensure alignment between the visual representation and the Site Allocation.

2.4 Whilst we appreciate that the Site Allocation Map is illustrative and suggests 'opportunities' for green space, there is a risk that when interpreted literally the Map would have the effect of preventing and significantly constraining the development potential of the Site Allocation and the other land uses sought, rendering the allocation itself unviable and unable to deliver the actual objectives of the allocation. This risk is magnified given the graphic representation of the Green Space on the Site Allocation Map appears to be an output of the Capacity Testing work recently published. A capacity test that fails to appreciate requirements for social and transport infrastructure within the Site Allocation and the current lack and poor quality of the existing 'green spaces'.

2.5 Ultimately, the existing public realm and open space offers little in the way of usable defined amenity for local residents, visitors or the wider community. Whilst we appreciate the space was award winning when originally conceived, the locality has undergone significant change in the last 20 years, meaning the space is now not fit for purpose. There is the opportunity for the redevelopment of the wider site to achieve a much improved and contextually relevant approach to public realm and place making. This transformation will be facilitated by the delivery of new homes and complementary uses, which will help cross-subsidies and enable the creation of a high-quality public realm.



- 2.6 The terminology 'Opportunity for Green Space' is also inconsistent with the primary objectives for the reconfiguration, consolidation and enhancement of the space proposed in the Site Allocation. We also note that the extent of the 'Opportunity for Green Space' is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren't previously identified for any protection/allocation on the Reg 18 Local Plan Policies Map.
- 2.7 Please refer to the accompanying capacity testing (appendix 2) undertaken on behalf of Excel and designed by Mount Anvil, which identifies that within the land ownership (excluding the site occupied by Busy Bees nursery to the north-west of the Site Allocation) there is capacity to delivery up to c.375 new homes in addition to an aparthotel, food and beverage, a cultural/exhibition venue, in addition to open space that better meets the wording of the draft Site Allocation which states (Development principles) *"...Royal Victoria Square to be reconfigured at the east of the site creating an inviting entrance to the Excel conference centre site"* and (Infrastructure requirements) *"...by re-providing and enhancing Royal Victoria Square Civic Space as a consolidated open space"*.
- 2.8 Overall, we consider that, in its current form, the Site Allocation Map's extensive designation of all existing public realm as 'opportunity for green space' would unduly constrain the potential for beneficial growth and fail to deliver sustainable development within the Royal Victoria neighbourhood, contrary to national and regional planning policy. Therefore, we strongly believe that Site Allocation N2.SA5 is not effective and won't encourage significant levels of growth.

N2.SA5 Excel Western Entrance – Development Principles (page 395)

- 2.9 We consider that the Site Allocation 'Development Principles' wording should better reflect the scale of the opportunity, emphasising how the allocation can contribute directly towards the wider Local Plan policy and vision objectives regarding housing delivery, employment, public realm, the Royal Docks as a visitor and cultural destination, and the importance of Excel's strategically important role as a major cultural anchor in the Borough.
- 2.10 Given the site's strategic proximity to the Exhibition Centre, any proposed allocation must incorporate a diverse mix of land uses to ensure long-term sustainability. Such an approach will not only complement Excel's operations but also actively enhance the vitality of the Exhibition Centre.
- 2.11 As a minimum, we consider that the 'Development Principles' wording should be amended to reflect the broader range of land uses that can be achieved as part of the Site Allocation, specifically referring to visitor accommodation, cultural/exhibition and food and beverage uses, in addition to residential, as follows (blue = our suggested wording):



Residential development, visitor accommodation, cultural/exhibition, food and beverage, community facility and open space.

N2.SA5 Excel Western Entrance – Design Principles (page 395), including Question 4.4 Part C: The requirements relating to tall buildings.

- 2.12 The draft Site Allocation currently prescribes building heights ranging between 21-32m (ca. 7-10 storeys) with a taller building up to 40m (ca. 13 storeys) to the west. It is assumed that these heights are AOD but this should be confirmed.
- 2.13 The general approach in the Site Allocation, of reinforcing the legibility of the existing street hierarchy and active frontages, locating lower massing towards the designated heritage assets and increasing height to the west of the Site, is sound. However, from a heritage and townscape perspective, there is potential for greater capacity within the Site boundary and additional height beyond that proposed in the Site Allocation. Taller buildings could result in a more elegant form and better integrate with the immediate and surrounding context. This approach has the potential to ensure that the tallest buildings can successfully act as way finders and gateways, optimising the use of the Site, and contributing positively to the setting and significance of nearby heritage assets.
- 2.14 The Townscape and Heritage Assessment, prepared by TTC, was previously submitted as part of the Regulation 19 representations at Appendix 3 and identifies that prevailing building heights along Western Gateway have shoulder height buildings of between 7-13 storeys – not limited to 10 storeys - with taller buildings up to 22 storeys – significantly higher than 13 storeys. Based on an analysis of townscape, building hierarchy and heritage, it is considered that more appropriate building heights for the Site Allocation would be as follows (blue = our suggested wording):

Building heights should range between ~~21-32m (ca. 7-10 storeys)~~, 21-40m (ca. 13 storeys) with a taller buildings up to 40m (ca. 13 storeys) 60m (ca. 19 storeys) to the west towards the western part of the site to add wayfinding and to mark the gateway to the site. Massing should generally step down towards the east of the site to sensitively integrate with the prevailing height of the context and with the heritage assets

- 2.15 In summary, the building heights prescribed in the draft Site Allocation place a significant constraint on the development capacity of the Site. This does not fully reflect the prevailing townscape context or the opportunities for height and form that have been identified through extensive analysis. Over the past two years, we have engaged in detailed pre-application discussions and commissioned a comprehensive Townscape and Heritage Assessment, which collectively demonstrate that greater height and massing—especially towards the western edge—would deliver a more optimal and contextually appropriate scheme. We therefore urge that the Site Allocation be revised to allow for increased building heights, enabling the Site to fulfil its potential as a prominent gateway and contribute meaningfully to the wider urban fabric.



Question 4.4 Part H: The assumption that around 140 homes will be built on N2.SA5 between 2028 and 2033.

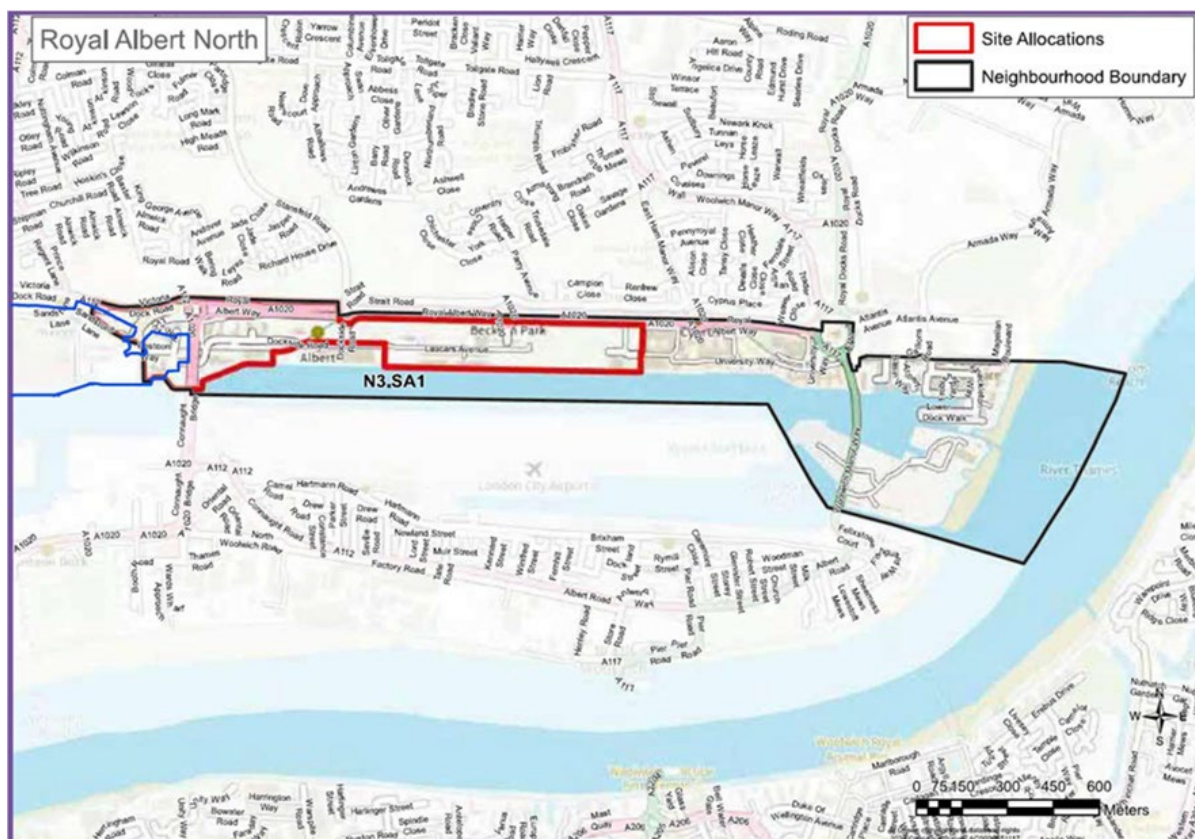
- 2.16 Excel's main concern regarding the accuracy of Policy N2.SA5 is the fact that the Site Allocation is clearly the outcome that has been described within the Site Capacity Study, which has only been released recently in conjunction with the examination in public ('EiP') documentation.
- 2.17 The Indicative Site Capacity for the Excel Western Entrance identifies potential for approximately 136 residential units based on 16,101 sqm GEA. However, this assessment significantly underestimates the Site's true potential. The Site occupies a pivotal position at the heart of the Royal Docks regeneration area, forming a key component of the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF). The Site's highly accessible location underpinned by the Elizabeth Line station at Custom House at the entrance to Excel London makes the Site ideally suited to support a higher-density, mixed-use development that contributes meaningfully to local and strategic growth objectives.
- 2.18 The London Plan (Table 2.1) identifies capacity for around 30,000 new homes and 41,500 new jobs across the Royal Docks / Beckton Riverside OAPF area. Given this strategic context, and supported by extensive design and feasibility work undertaken over the past three years—as evidenced in the pre-application proposals appended to the Regulation 19 representations—it is clear that the Site can accommodate a substantially greater quantum of development. We consider that a capacity of up to approximately 375 high-quality homes (excluding Busy Bees) would represent an appropriate and deliverable level of growth, fully consistent with the ambitions of the London Plan, the OAPF, and LBN's new Local Plan to deliver much-needed housing within the borough.
- 2.19 The indicative figure of 140 homes for the Site would not encourage significant growth and would undermine the Site's potential in delivering much needed housing in line with national, regional and local planning policy.
- 2.20 Accordingly, it is requested that the Site Allocation be modified to reflect the Site's capacity to deliver up to approximately 375 new homes (excluding Busy Bees), ensuring the policy is both justified and effective in supporting sustainable growth within the Royal Docks and Newham.

Question 4.5: Are policies N3 and N3.SA1 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Royal Albert North neighbourhood?

- 2.21 As set out in our Reg 19 representations we request that the Site Allocation boundary relating to N3.SA1 'Royal Albert Dock' is amended to exclude the land within the ownership of London International Exhibition Centre Plc, comprising the Phase 3 extension to the Excel London venue and the DoubleTree By Hilton Excel and surrounds. The Phase 3 extension is now complete and opened in late 2025. The DoubleTree By Hilton Excel is being retained and potentially extended to



meet the significant demand for visitor accommodation. As such, neither of these sites should be included within the Site Allocation because they are not intended to come forwards for comprehensive redevelopment. Please see the plan below, identifying the extent of London International Exhibition Centre Plc's ownership in blue, overlaid on the Site Allocation. Accordingly, the Site Allocation red line boundary should be amended to reflect the blue ownership line. This approach has been agreed with GLA Land and Property.





3. Conclusions

- 3.1 This Hearing Statement, prepared on behalf of London International Exhibition Centre Plc (Excel) and in design partnership with Mount Anvil, demonstrates that while the overall vision for the Royal Docks as set out in the new Local Plan is generally supported, several key modifications are required to ensure the policies and Site Allocations are both justified and effective in accordance with national and regional planning policy.
- 3.2 In relation to Site Allocation N2.SA5 ('Excel Western Entrance'), the evidence presented confirms that the indicative capacity of approximately 136 residential units substantially underrepresents the Site's true potential and would not encourage significant levels of growth. Extensive feasibility and design work undertaken over recent years clearly demonstrates that the Site is capable of accommodating up to approximately 375 high-quality homes (excluding Busy Bees), alongside complementary uses including visitor accommodation, cultural/exhibition, and food and beverage uses. This level of development would make a more meaningful contribution to meeting local and strategic housing needs while optimising a highly accessible and strategically significant location within Royal Victoria.
- 3.3 Furthermore, the current representation of the 'Opportunity for Green Space' within the Site Allocation Map is considered overly restrictive and inconsistent with both the wording of the draft allocation and the intended spatial strategy for the area. Amendments are therefore sought to ensure the policy wording and supporting plan facilitate, rather than constrain, the delivery of sustainable development. Similarly, the development principles and building height parameters should be reviewed to acknowledge the Site's capacity to accommodate taller buildings in line with the surrounding built context. Increased height on this Site would be both appropriate and beneficial, enhancing legibility, supporting housing delivery, and contributing to the wider regeneration objectives of the Royal Victoria.
- 3.4 In respect of Site Allocation N3.SA1 (Royal Albert Dock), it is requested that the red line boundary be amended to exclude land within Excel's ownership, encompassing the recently completed Phase 3 extension and the DoubleTree By Hilton Excel site, both of which are not intended for redevelopment. This amendment will ensure that the Site Allocation remains realistic, deliverable, and aligned with agreed positions between the Greater London Authority and Excel.
- 3.5 Overall, these proposed modifications are necessary to ensure that the new Local Plan:
- Aligns fully with the strategic direction of the London Plan and Royal Docks and Beckton Riverside OAPF;
 - Optimises the capacity of this Strategic Site to contribute to the delivery of the new homes London needs; and
 - Provides an effective and flexible framework for sustainable growth, housing delivery, and economic investment in the Royal Docks which will allow for further investment into high quality public realm and green spaces.



3.6 As drafted, Excel consider that the Local Plan policies so far as they relate to site allocation N2.SA5 Excel Western Entrance are not justified and would not be effective in helping to encourage significant levels of growth or to achieve sustainable development in the Royal Victoria Neighborhood. However, Excel consider that the Local Plan policies and Site Allocation can be made sound through the amendments set out in this Hearing Statement and detailed in Appendix 1 and we invite the Inspector to recommend Main Modifications accordingly.



Appendix 1

N2.SA5 Excel Western Entrance	
Site address	Excel Western Entrance, Western Gateway, E16
Neighborhood	Royal Victoria
Site area	3.46 hectares
Public Transport Accessibility Level	2 to 3 3 to 4 (2031)
Flood Risk	The site is shown to be at significant risk of flooding, the site is in Flood Zone 3 and Flood Zone 2. There is also some pluvial flood risk in the 0.1% AEP event. Access and egress is highly likely to be impeded if the Thames were to breach its bank and defences were to fail.
Utilities	Existing on-site sewer
Heritage Designations	Royal Docks Archaeological Priority Area (Tier 3) Stothert and Pitt Cranes (Grade II) Warehouse W (Grade II) In the vicinity of: Warehouse K (Grade II)
Natural environment Designations	Open space designation: Royal Victoria Square The site is in an area of deficiency of access to Regional, Metropolitan, District, and Pocket Parks. Air Quality Management Area
Existing uses	Main entrance to Excel conference centre with open space, a nursery, offices and residential accommodation at Warehouse W.
Development Principles	Residential development, visitor accommodation, cultural/exhibition, food and beverage community facility and open space. Development should retain and enhance the existing open space along the waterfront edge. Royal Victoria Square to be reconfigured at the east heart of the site creating an inviting entrance to the Excel conference centre site. Development should protect existing community facility at the site in accordance with Local Plan Policy SI1. Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan Policy



	CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).
Design Principles	The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2. Building heights should range between 21-32m (ca. 7-10 storeys) 21-40m (ca. 13 storeys) with a taller buildings up to 40m (ca. 13 storeys) 60m (ca. 19 storeys) towards the western part of the site. to the west to add wayfinding and to mark the gateway to the site. Massing should generally step down towards the east of the site to sensitively integrate with the prevailing height of the context and with the heritage assets. Development should reinforce the legibility of the existing street hierarchy by creating residential and community facility active frontages along Western Gateway and Royal Victoria Square. Development should conserve and enhance the Grade II listed Warehouse W and the Grade II listed Stothert and Pitt Cranes in the site and the Grade II listed Warehouse K in proximity to the site and their settings. The design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy. Routes through and to and from the site should improve north-south access to the water and improve the public realm on the dock edge. The design and layout should maintain the open character of the water. The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy. The layout of the site should take account of the noise contours across the site from London City Airport and design measures should minimise exposure from the airport, and should minimise exposure to poor air quality in accordance with Local Plan Policy CE6. The design and layout of the site should take account of the existing on-site sewer.
Infrastructure Requirements	Development should protect existing open space and address open space deficiency by re-providing reconfiguring and enhancing Royal Victoria Square Civic Space as a consolidated open space to the east of the site. The open space provision should prioritise community growing opportunities. In addition to the The open space provision, development should include provide publicly accessible play space in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play, which should



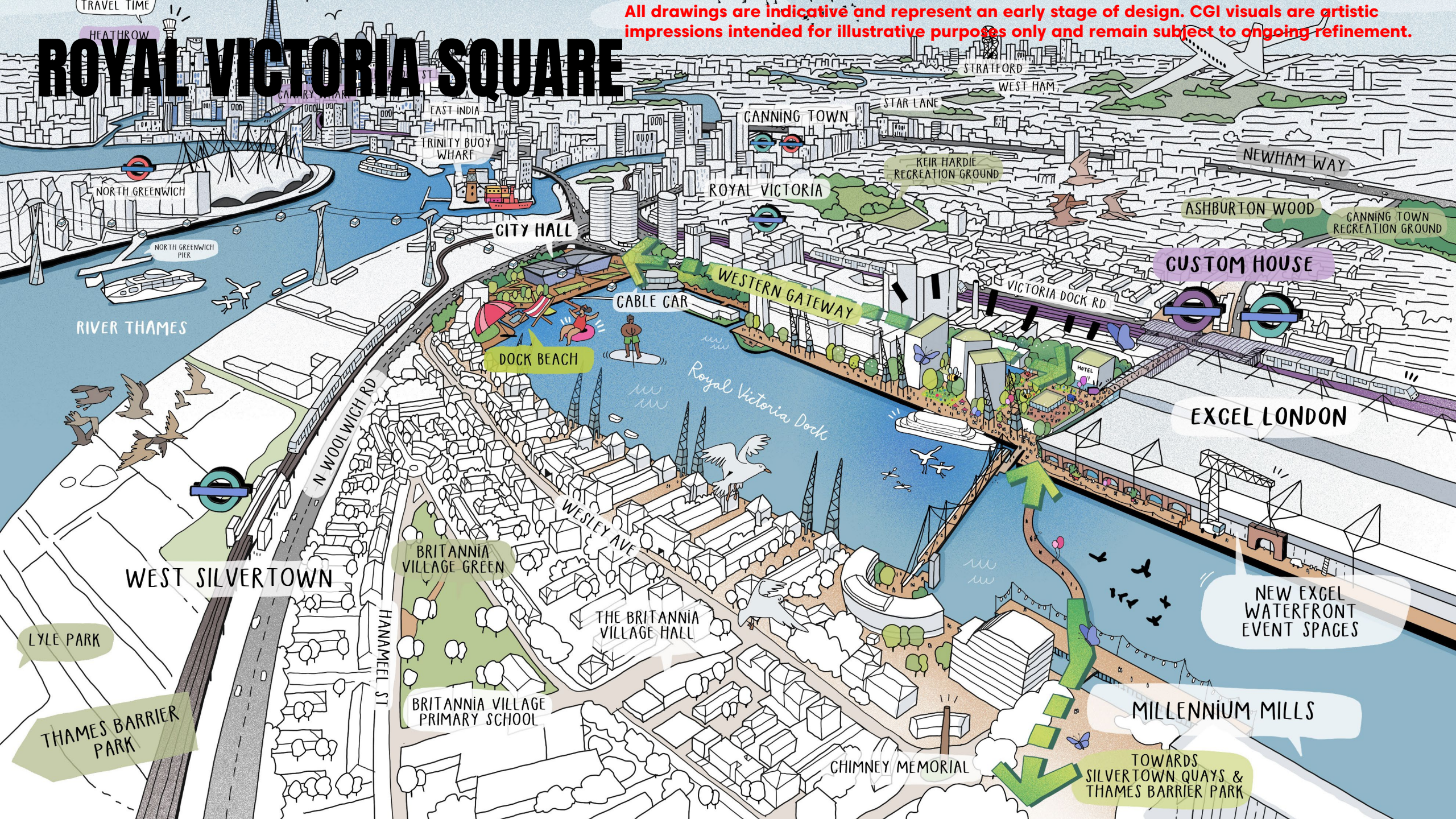
	be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.
Phasing and Implementation	Medium term The potential impact of the existing on-site sewer on design and layout should be taken into account at the pre-application stage through early engagement with Thames Water.



Appendix 2

All drawings are indicative and represent an early stage of design. CGI visuals are artistic impressions intended for illustrative purposes only and remain subject to ongoing refinement.

ROYAL VICTORIA SQUARE



LYLE PARK

THAMES BARRIER PARK

WEST SILVERTOWN

BRITANNIA VILLAGE PRIMARY SCHOOL

BRITANNIA VILLAGE GREEN

THE BRITANNIA VILLAGE HALL

DOCK BEACH

CABLE CAR

WESTERN GATEWAY

ROYAL VICTORIA

CANNING TOWN

STAR LANE

WEST HAM

STRATFORD

KEIR HARDIE RECREATION GROUND

CUSTOM HOUSE

ASHBURTON WOOD

CANNING TOWN RECREATION GROUND

EXCEL LONDON

NEW EXCEL WATERFRONT EVENT SPACES

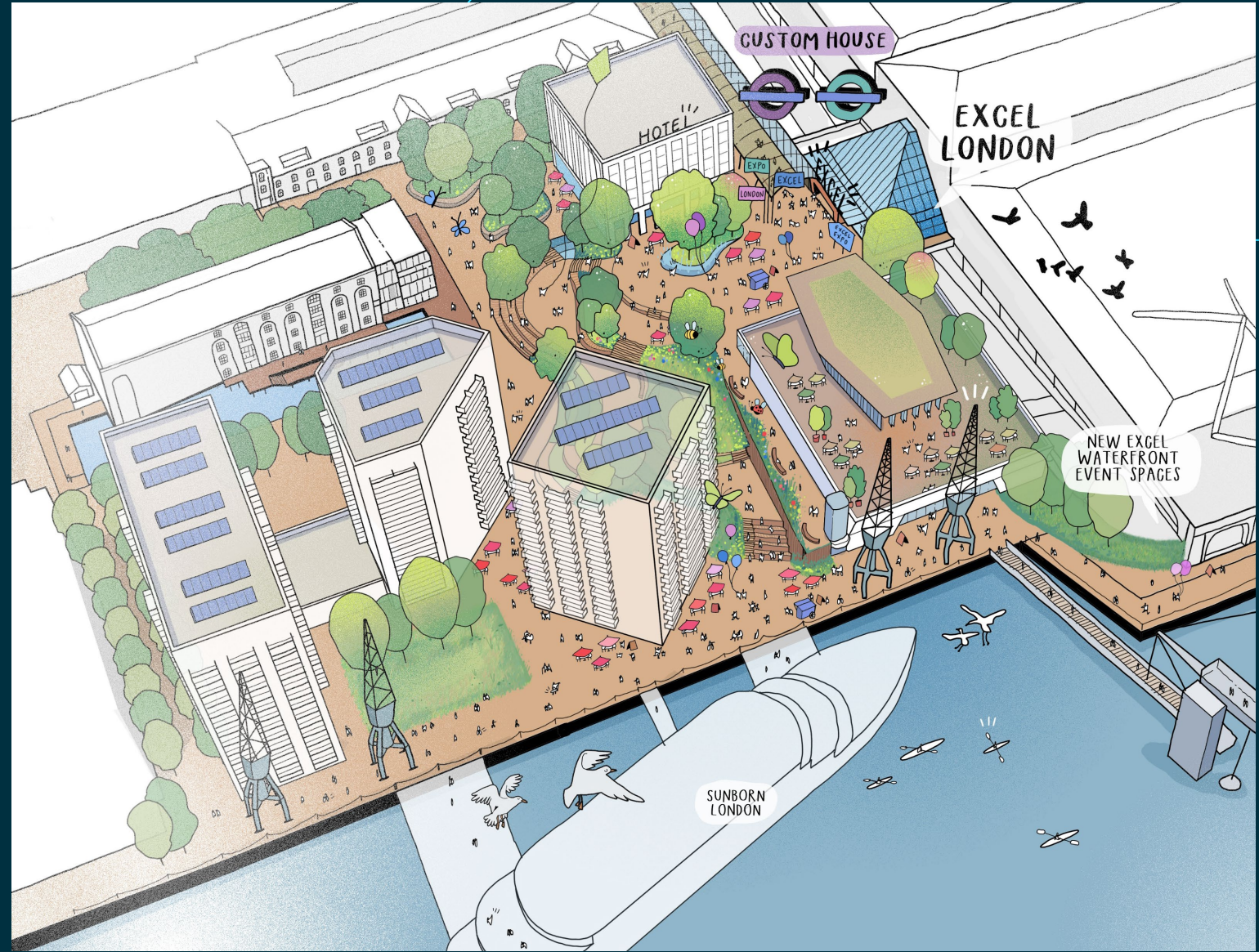
MILLENNIUM MILLS

TOWARDS SILVERTOWN QUAYS & THAMES BARRIER PARK

CHIMNEY MEMORIAL

PROPOSED MASTERPLAN

- Circa 375 Homes
- Significantly improved landscape and public realm replacing the existing poor quality steps, trees and open space
- A new gateway to The Royal Docks
- Busy bees site is outside of ownership of the site
- Increase in affordable housing



PROPOSED GENERAL ARRANGEMENT



MASTERPLAN & PRECEDENTS



Three Waters (Mount Anvil)
5-20 Storeys



3 & 15 West Lane (Canary Wharf Group)
13 Storeys



Hoxton Press
16-20 Storeys



Gas Holder Gardens (Argent)
50m x 40m

