



Newham Local Plan Examination

Matter 4: Neighbourhoods and Allocations

Hearing Statement

November 2025

1. Introduction

- 1.1 This Examination Hearing Statement has been prepared by the London Legacy Development Corporation (LLDC) to respond to matters identified by the Planning Inspector in their Matters, Issues and Questions (MIQs) report concerning the draft Newham Local Plan.
- 1.2 LLDC is a Mayoral Development Corporation that was formed to regenerate the area in and around the Queen Elizabeth Olympic Park (QEOP) following the legacy of the Olympic Games in 2012. Through its urban regeneration projects, the organisation is working on delivering sustainable and thriving neighbourhoods with a focus on housing delivery and good growth. LLDC has a number of strategic sites within the Borough of Newham.
- 1.3 LLDC has been in engagement with the London Borough of Newham (“Newham”) throughout the Regulation 18 and 19 public consultations of the draft Newham Local Plan and has also entered into two Statement of Common Grounds (SoCG) with Newham, referred to as Parts 1 and 2 (reference SD058). SOCG Part 1 was between Newham and LLDC both as local planning authority and landowner prior to the transition of planning powers prior to the transition of planning powers from the LLDC back to the neighbouring boroughs at the end of November 2024, with a focus on strategic cross-boundary matters. SOCG Part 2 was between Newham and LLDC as landowner only with a focus on strategic development sites owned and/or managed by LLDC that will be impacted by the proposed policies.
- 1.4 The questions under Matter 4: Neighbourhoods and Allocations that the LLDC wishes to provide comments on are as follows:
 - Q4.10 – Policy N8 Stratford and Maryland

2. N8 Stratford and Maryland

- 2.1 LLDC will restrict its comments to site allocations relating to its development sites only and has therefore omitted parts of Q4.10 that are not relevant to them. Site allocations the LLDC is commenting on are:
 - N8.SA7 Rick Roberts Way
 - N8.SA8 Bridgewater Road
 - N8.SA9 Pudding Mill

Q4.10 Are policies N8, and N8.SA1 to N8.SA10 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in the Stratford and Maryland neighbourhood? In particular:

- a) The support in policy N8 part 1 for a moderate uplift in density in “enhance” areas.
- b) The requirements relating to tall buildings, including in terms of viability and the effect on heritage assets.
- c) The layout of development illustrated on the site maps.
- d) Whether the detailed policy requirements are consistent with extant planning permissions.
- k) The assumption that around 390 homes will be built on N8.SA7 between 2028 and 2033.
- l) The assumption that around 680 homes will be built on N8.SA8 between 2028 and 2033.
- m) The assumption that around 2,110 homes will be built on N8.SA9 between 2023 and 2033.

- 2.2 As detailed in our *Matter 3: Spatial Strategy* submission, LLDC has strategic sites which, together with Stratford Waterfront (SWFT), form part of a ‘portfolio approach’ which must collectively deliver 50% affordable housing (all figures by habitable room), of which 30% must be low-cost rented housing and 70% intermediate housing. These sites are contained within the aforementioned site allocations and LLDC has concerns regarding inconsistency between outline permissions and policy requirements set out in each proposed site allocation, as well as inconsistency with site allocations in the adopted LLDC Local Plan. This was also expressed in our Regulation 19 representations and were discussed at SOCG Parts 1 and 2 (reference SD058).

3. N8.SA7 Rick Roberts Way

- 3.1 Site allocation N8.SA7 Rick Roberts Way encompasses land owned by LLDC, Newham and St William. The land owned by St William has detailed planning permission for 245 homes (reference 23/00457/FUL). Land owned by LLDC and Newham within Rick Roberts Way (hereafter referred to as “RRW”) are both currently part of the wider Legacy Communities Scheme (LCS) outline permission (reference 11/90621/OUTODA as varied by 24/00115/VAR). The LLDC land has an outline planning permission for residential development (approximately 400 units), and land owned by Newham has outline permission for a school (reference 11/90621/OUTODA as varied by 24/00115/VAR). Comments below principally relate to the LLDC land.

Height and detailed policy requirements

- 3.2 It is welcomed that N8.SA7 Rick Roberts Way includes requirements to improve public realm along the Rick Roberts Way road and a minimum provision of 1.2ha of green space

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as envisaged in the RRW UDLF and in line with planning requirements of its extant permission. However, the allocation does specify a height limit of 50m and as detailed in our *Matter 3: Spatial Strategy* submission and generally raised by LLDC in our Regulation 19 representations, it is considered that an increase and/or flexibility on height is required to enable RRW to meet these wider place requirements in addition to requirements of the portfolio approach, where the shortfall of affordable housing will be delivered on RRW. The site is also subject to an Urban Design and Landscape Framework (UDLF) which was produced collectively by Newham, LLDC and St William to ensure coherent and comprehensive delivery of development across all landownerships.

- 3.3 The detailed policy requirements of N8.SA7 Rick Roberts Way include the protection and enhancement of existing sports and recreation uses, which is inconsistent with the extant permission for RRW. As raised in our Regulation 19 representation and the SOCG Parts 1 and 2, the existing sports and recreation use on site is the Stratford Padel Club (SPC) is an interim use and has the sole purpose of activating the site whilst it is vacant (reference 25/01823/FUL). LLDC's agreement with SPC is due to expire in 2027. It is considered that the retention of a sports hall/Padel courts of this scale with optimum ceiling heights of 8m, would severely constrain the site's ability to meet requirements of the portfolio approach, deliver the open space required and accommodate public realm improvements on Rick Roberts Way Road. In our discussion with Newham for SOCG Part 1, Newham referred to its Built Leisure Needs Assessment (reference EB045) and argued that:

"RRW was identified as a location where a leisure facility would be suitable and needed. The study found paddle tennis was an increasing popular leisure use and that we should be looking for a permanent location."

LLDC has reviewed this evidence and it is not stated that RRW has been identified as an appropriate location for a leisure use facility. In addition, considering RRW as a permanent location for SPTC is contradictory to draft policy BFN1 part 8 of the draft Local Plan which states that meanwhile (temporary) development should not prejudice the future long-term development of a site.

- 3.4 Site allocation N8.SA7 Rick Roberts Way also requires employment uses to prioritise light industrial uses. As set out in our Regulation 19 representations, this is also inconsistent with the extant permission and is incompatible with the vision and aspirations of the site to deliver residential-led development with active frontage along Stratford High Street.

Delivery assumptions

- 3.5 The delivery assumption of 390 homes at N8.SA7 Rick Roberts Way between 2028 and 2033 is noted, but LLDC notes that this is considerably lower than what is currently envisaged in the extant permission of RRW and the St William site, which comprise of approximately 400 homes and 245 homes respectively. It is also lower than the adopted

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LLDC Local Plan capacity of 750 homes identified in site allocation SA3.6. As set out in LLDC's submission for *Matter 3: Spatial Strategy*, it is also important to note that RRW is required to provide a balance of affordable housing to meet requirements of the portfolio approach. On the basis that 245 homes of the 390 proposed capacity have already been approved, this leaves a total of 145 homes on LLDC land (assuming a school will be provided on the Newham land). This will be insufficient to deliver the LLDC's portfolio commitments, which we currently estimate to be over 700 affordable habitable rooms at RRW just to meet the shortfall from SWFT, BWT and PML.

- 3.6 The above would also place LLDC in breach of its current legal obligations to Newham. Clause 14.2.2 of the S106 Agreement attached to the LCS planning permission requires the LLDC to submit a new planning application for RRW (also known as PDZ12 in the LCS permission) to secure "a greater quantum of residential floorspace" than permitted by the original LCS consent (37,900sqm, or approximately 400 homes). This is explicitly to address a loss of residential floorspace elsewhere in the LCS masterplan, as a result of slot-in permissions for cultural and educational uses.
- 3.7 We therefore believe modifications to this site allocation are required to help secure the delivery of this new neighbourhood (in accordance with existing obligations):
- Deletion of the requirement to retain the existing leisure facility within the LLDC land, which is inconsistent with the extant planning permission or obligations relating to the future use of this land;
 - Clarification on the requirement to include light industrial uses, which is inconsistent with the extant planning permissions of all land ownerships;
 - Adjustment of the site capacity in line with the above and which takes into consideration the LLDC's obligations regarding the delivery of affordable housing across its portfolio, and housing delivery more widely.
 - Reconsideration of height restrictions in order to help deliver a viable scheme in accordance with the above requirements.

4. N8.SA8 Bridgewater Road

- 4.1 Site allocation N8.SA8 Bridgewater Road, also known as Bridgewater Triangle (BWT), has outline permission for residential-led mixed use development (reference 21/00403/OUT). LLDC has consistently highlighted through our representations that the proposed site allocation is inconsistent with the site allocation within the existing LLDC Local Plan and does not make reference to the extant planning permission that covers this site in full. LLDC and Ballymore, as joint venture partners, have been in pre-application discussions with Newham since late 2024 in preparing reserved matters for the site. These matters are due to be formally submitted for determination in late 2025/early 2026.

Height requirements and delivery expectations

- 4.2 As noted in our Regulation 19 representations and more broadly covered in our *Matter 3: Spatial Strategy* submission, we do not believe the proposed height restrictions will support the delivery of 680 residential units on this site.
- 4.3 In preparing detailed development proposals further to the extant outline consent (reference 21/00403/OUT), considerable effort is being made to maintaining appropriate light conditions for the adjacent allotments whilst also ensuring that the development is able to deliver the required quantum of residential development. This is difficult to achieve either physically or viably if the current height restriction is maintained. We have therefore proposed that the building height cap is increased at BWT to reflect current proposals, or sufficient flexibility is incorporated into the wording of the policy (as with the current LLDC Local Plan) to allow for specific exceedances to be permitted where this can be shown to be necessary to support delivery of housing.
- 4.4 In other aspects of the allocation's wording relevant to the allotments, proactive actions have been taken by both LLDC and Newham to support both deliverability of development and maintenance of amenity. Specifically, amended text has been included in the Schedule of Main Modifications (reference SD004), at Modification M105.
- 4.5 As noted in the Part 2 SOCG (reference SOCG004) there is agreement in principle between LLDC and Newham that it would be acceptable to both parties if Modification M105 was further amended to:

*Massing should ~~step down towards~~ **be sensitively designed to prevent overshadowing** the allotments in the north of the site ~~to sensitively integrate with the low rise context and prevent overshadowing~~ **to protect their functionality.***

- 4.6 For the avoidance of doubt, this further amendment removes the word 'and' from the modified proposed policy text. This clarifies that this clause only relates to overshadowing impacts on the functionality of the allotments, which it is noted was Newham's intention for the new wording.

Site layout

- 4.7 As has been noted by LLDC since representations were made at Reg. 18 stage and also raised in SOCG Parts 1 and 2, the proposed Plan and associated Policies Map includes an extension to the existing Greenway SINC designation that encroaches onto this site allocation. This would be inconsistent with both the equivalent site allocation within the current LLDC Local Plan and the extant outline consent for development granted in 2023 where the proposed SINC designation overlaps with 3 approved development parcels. For

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completeness, it would also be inconsistent with the much earlier LCS outline approval for delivery of housing on this site granted in 2012.

- 4.8 At Regulation 18 stage, when LLDC first raised this inconsistency, the published version of the *Newham SINC Review* (April 2022) provided no substantive evidence for inclusion of this area as an addendum to the existing Greenway SINC. Its inclusion could at best be covered by a general comment that *‘...most sites may have had very minor boundary changes as a result of aligning the original SINC boundary to MasterMap’*.
- 4.9 The *Newham SINC Review* (April 2025) now submitted as part of the examination’s evidence base (reference EB070) justifies the encroachment as an addendum to the existing Greenway SINC on the grounds that the land is *‘ecologically contiguous with the existing SINC’*. However, again no substantive evidence to justify this is offered and none was provided to the LLDC (despite requests) during discussions on the Statement of Common Ground (Part Two) prior to the Plan’s submission.
- 4.10 We therefore believe that modifications to this site allocation are required to support the delivery of the 680 homes proposed:
- An increase in the maximum building height cap to accommodate the proposed 82m building heights.
 - Removal of the extension of the SINC designation which has not been sufficiently justified and which is in conflict with approved development parameters.

5. N8.SA9 Pudding Mill

- 5.1 Pudding Mill Lane is located just northwest of Stratford High Street and is bound by Bow Back River to the southeast, Barbers Road to the northwest, City Mill River to the northeast and the Legacy Wharf development to the southwest. The site has a new ‘slot-in’ permission (reference 21/00574/OUT) granted in September 2023 securing a greater quantum of residential floorspace in line with the LCS S106 obligation. The ‘slot-in’ permission comprises of mixed-use residential, commercial and community development to form a proposed ‘Local Centre’.

Height Requirements

- 5.2 As noted in our Regulation 19 stage representations and *Matter 3: Spatial Strategy* submission, LLDC does not believe that the proposed height restriction for the site will support 970 residential units as approved (reference 21/00574/OUT).
- 5.3 The current wording seeks to cap building heights at 50m across the allocation and only allows taller building elements in set defined areas. However, the outline permission

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allows for building heights to range between 21-32m (ca. 7-10 storeys) with taller buildings up to 100m (ca. 16 to 33 storeys).

- 5.4 The proposed draft text of the policy and the design principles are therefore not consistent with the outline consent, emerging Reserved Matters applications or the current site allocation in the adopted LLDC Local Plan.

Co-location of Residential and Employment Floorspace

- 5.5 LLDC has noted both through the Regulation 18 and 19 representations that the site allocation wording should go further to support the co-location of residential and employment uses.
- 5.6 As part of the approved Outline Planning Permission reference 21/00574/OUT up to 51,738 sqm of Class E floorspace was approved alongside up to 116,553 sqm of Class C3 floorspace. The current N8.SA9 allocation wording does not provide sufficient flexibility or allow PML to fully deliver on the employment opportunities to meet the needs of the Borough in this location.
- 5.7 The site allocation references the Employment Policy J1 and development should come forward in line with the principles within that policy. The policy requires the development of office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)) and storage or distribution (B8) (will be supported in Local Mixed Use Areas (LMUA) as part of employment-led development. Uses identified in Table 8 should be prioritised in each location. However, there is no reference to Pudding Mill Lane as a Local Centre, nor the permitted employment floorspace in Table 8, providing no clarity as to how a deliverable site that can help meet borough wide growth requirements, will be considered.
- 5.8 We therefore believe that modifications to this site allocation are required to support the delivery of the 970 homes proposed for this part of Pudding Mill:
- An increase in the maximum building height cap to accommodate the proposed 95m building heights.
 - Consider more supportive wording to support the deliverable employment function of PML and fully deliver on its potential as a new local centre.

6. Proposed site allocations

- 6.1 LLDC would also like to highlight that there were other sites with development potential that were put forward for site allocation, which are the following:
- Aquatics Triangle (as part of allocation N8.SA6 Stratford Waterfront South)
 - Three Mills

- Land at London Stadium

6.2 Whilst LLDC believe these sites require a site allocation the position of Newham is noted and we look forward to working with the Newham in bringing these sites forward at some point in the future.

7. Summary

- 7.1 This Hearing Statement responds specifically to Q4.10 under Matter 4: Neighbourhoods and Allocations of the Inspector's MIQs relating to draft policy N8 (Stratford and Maryland). It summarises LLDC's concerns about the policy, in particular the inconsistency of site allocations with extant permissions.
- 7.2 The above concerns have been expressed specifically regarding site allocations, N8.SA7 Rick Roberts Way, N8.SA8 Bridgewater Road and N8.SA9 Pudding Mill all of which encompass LLDC's developments projects that will deliver major residential-led mixed use development. As currently drafted, it is considered that the site allocations do not fully take extant permissions of these projects into account which has the potential to negatively impact their deliverability and undermine the benefits they will offer.