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## **R22 Local Plan**

### **Matter 3: Spatial Strategy**

## **Newham Local Plan**

St William Homes LLP

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NOVEMBER 2025

# Matter 3: Spatial Strategy

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- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 3: Spatial Strategy. This hearing statement responds to the 'Inspector's matters, issues and questions, written statements; and hearings programme' (IN3).
- 1.2 St William have submitted representations to the Regulation 18 ('R18') Issues and Options stage in February 2023, and further representations at the Regulation 19 ('R19') Draft Local Plan consultation stage in September 2024. Our client continues to be engaged at the Regulation 22 Examination in Public Stage ('R22 LP') and will expand on the matters raised in their previous representations within this hearing statement, where necessary.
- 1.3 These representations should be read alongside our hearing statements in response to Q1.9/10 (Viability) Q2.2/3 (Housing requirement); Q4.15 (N13 and N13.SA3 East Ham Gasworks); M5 (Housing land supply); Q6.2 (Affordable Housing) and Q6.3 (Housing Mix); and Q12.1 Green Spaces.

## Policy BFN1 Spatial Strategy

*Q3.1 Does policy BFN1 set out an appropriate spatial strategy, taking account of reasonable alternatives, in the context of the London Plan? In particular:*

*a) Directing significant levels of growth to the six neighbourhoods (N1, N2, N3, N4, N5 and N17) in the Royal Docks and Beckton Riverside Opportunity Area; two neighbourhoods (N6 and N7) in the Poplar Riverside Opportunity Area; and the N8 Stratford and Maryland neighbourhood?*

*b) Supporting incremental change in all of the other neighbourhoods (N9 to N16)?*

- 1.4 St William remains supportive of the spatial strategy which directs development to all of Newham's 17 neighbourhoods to distribute the benefits of growth (part 1) and to direct significant levels of growth to the six neighbourhoods in the Royal Docks and Beckton Riverside Opportunity Area (part 1 (a) (i)) as well as the N7 Three Mills neighbourhood, which forms part of the cross boundary Poplar Riverside Opportunity Area (part 1 (a) (ii)). We welcome this approach, which aligns with the London Plan spatial strategy<sup>1</sup>.
- 1.5 Whilst the principle of incremental change in all of the other neighbourhoods (N9-16) is supported to enhance each neighbourhood's character and the delivery of site allocations, we provide further comments on the specific site allocation N13.SA3 within N13 East Ham as part of our hearing statement to Matter 4 (Neighbourhoods and Allocations).

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<sup>1</sup> London Plan Policy SD1 'Opportunity Areas'

## Policy D4 Tall Building Zones

*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?*

- 1.6 Draft Policy D4 ‘Tall Buildings’ of the R22 LP is inconsistent with Policy D9 of the London Plan by virtue of the following.

### The Use of Maximum rather than appropriate building heights

- 1.7 Table 1: Tall Building Zones identifies a “height range maximum” across all Tall Building Zones (TBZ). This is contrary to the London Plan Policy D9B(2) which proposes that ‘appropriate’ tall building heights are identified on maps.
- 1.8 The Mayor of London wrote to the London Borough of Newham<sup>2</sup> to confirm that the use of the term ‘*maximum*’ height is inconsistent with London Plan Policy D9, advising instead that the reference should revert to ‘*appropriate building heights*’. This amendment was considered “*to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of tall building zone and perhaps seeking lower heights towards the edge of that zone*”.
- 1.9 We agree with this statement, albeit no meaningful change has been undertaken by the Council.
- 1.10 The application of prescribed ‘*maximum*’ heights is contrary to the intent of both Policy D3 and Policy D9 of the London Plan, and risks impeding proposals that are able to follow the design-led approach and can be justified in architectural, townscape, and visual terms. This unnecessarily limits opportunities to optimise housing delivery and growth.
- 1.11 This is particularly relevant given the Council’s inability to demonstrate a 5YHLS<sup>3</sup> and its sustained underperformance against the Housing Delivery Test<sup>4</sup>.

### Flexibility and consideration of tall buildings outside tall building zones

- 1.12 Draft policy D4(2) states that “*Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’*”.
- 1.13 This conflicts with the High Court judgement on the application of the London Plan D9<sup>5</sup>. The Court made clear that London Plan D9 Part A or Part B are not pre-conditions (“gateways”) to the operation of Part C. In other words, the Mayor (or deciding authority) may proceed to assess a tall building scheme under Part C even if the site is not in an identified ‘suitable location’ under Part B(3). This application of policy is absent from the draft policy. This is of course logical, as London Plan D9(C) requires visual, functional, environmental and cumulative

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<sup>2</sup> Greater London Authority – Letter to Newham Draft Submission Local Plan (Regulation 19), 30<sup>th</sup> August 2024

<sup>3</sup> EB058

<sup>4</sup> Housing Delivery Test: 2023 Measurement

<sup>5</sup> R (London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)

tests to be addressed (20 criteria in total) which if passed, would determine that a tall building is an appropriate typology in a non-tall building designation. This tally's with the design-led approach and robust townscape, heritage and visual analysis, rather than from fixed thresholds. This allows for a qualitative assessment of proposed tall buildings, and the testing and demonstration of acceptable effects.

1.14 To ensure soundness, the following text should be deleted *D4: Tall buildings 2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'.*

1.15 For draft site allocations, it must be noted that the '*maximum*' building heights have not been viability tested and are based on a borough wide tall building assessment, which has its limitations. The borough study is proportionate and cannot possibly test tall building suitability at the same level as a planning application. Therefore sufficient flexibility must be incorporated into tall building policy to enable proposals to be assessed on a case-by-case basis.

1.16 We also respectfully draw the Inspector's attention to the approach adopted by the Lewisham, Local Plan (adopted this year) and the Brent Local Plan found sound by the Secretary of State which includes the following text:-

1.16.1 Lewisham Local Plan (Policy QD4, paragraph 5.35) "*Development proposals for building heights that depart from the parameters set by the Local Plan will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development*".

1.16.2 Brent Local Plan (Policy BD2, paragraph 6.1.15 "*The heights identified for the Tall Buildings Zones, town centres and site allocations are based on a high level of analysis, rather than in many cases considering a detailed building design. They indicate the heights likely to be generally acceptable to the council. This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location. There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable*".

1.17 We propose that the Lewisham text is included in the supporting text.

#### Inconsistent Approach to Heights

1.18 We also note that draft Policy D4 does not align itself with the consented heights across various site allocations that have been subject to extensive design-led scrutiny through London Plan Policy D9, and local policies. Table 1: 'Tall Building Zones' should be updated in accordance with our suggested amendments at **Appendix 1**.

1.19 This text should be adopted for the R22 LP.

#### Inconsistent Approach to Gasworks designations

1.20 St William remains supportive of the Council's approach to designate N8.SA7 'Rick Roberts Way', N17 'Gallions Reach', and the N7.SA2 'Twelvetrees Park and Former Bromley-by-

Bow Gasworks' within emerging Tall Building Zones (TBZs). This recognises their significant potential for transformation and ability to contribute positively to meeting the borough's housing needs.

- 1.21 However, St William remains concerned that the Council's assessment of N13.SA3 'Former East Ham Gasworks' and its resulting exclusion as a suitable tall building location is *unsound*.
- 1.22 The approach taken differs markedly from that applied to the other three former gasworks sites, which have all been appropriately characterised as former industrial, brownfield locations concluding them as appropriate for accommodating tall buildings. These sites have on site designations including adopted Borough Status SINC, listed buildings and adjacent conservation areas.
- 1.23 To rectify this and ensure consistency, N13.SA3 should be identified as an appropriate tall building location with heights equivalent to the existing gasholders structure of 46.9mAOD (ca.15 storeys) because it has less sensitivities than the other gas sites which are designated in TBZs.
- 1.24 The Council justification for exclusion of East Ham as a TBZ is set out within Tall Buildings Topic Paper (TP001), Paragraph 58:
  - *Gasholders are not classified as buildings but as structures. All of the remaining gas holders in Newham are not the enclosed typology (so called 'gasholder house'), but rather metal frame located in open air. The Historic England blog 'A Brief Introduction to Gasholders' quotes "the most distinctive visual element was the guide frame, a circular metal structure comprising a frame of metal uprights (often columns) and horizontal girders". Although gasholders are quite tall structures, their ephemeral nature has a different impact on the environment. Considering the height of these structures in isolation from the wider context would have misled the assessment of the tall building context and character in Newham. Therefore, gasholders have not been included in the existing heights map.*
- 1.25 Whether a gasholder is categorised as a 'building' or 'structure' is immaterial. The relevant consideration is its visual influence on the local townscape over a hundred years and the fact that it has been a defining landmark since 1903. Although operational fluctuations meant the internal bell-structure rose and fell during use, this does not detract from the gasholder's enduring presence as a landmark feature across the East Ham skyline – shown in Figure 2.



Figure 1 - Aerial of the Former East Ham Gasworks



- 1.26 This exact point was considered by the Secretary of State and his appointed Planning Inspector at the *Brighton Gasworks* appeal<sup>6</sup> concluding that the enduring presence of the steel-frame gasholder was a material consideration supporting the principle of tall buildings.

*“Insp 13.6 Indisputable evidence presented by the Appellant’s landscape and heritage witnesses demonstrate that gasholders were intrinsic features of the appeal site for well over a hundred years up until 2007. The visualisations of the inflated gasholders provided by the Appellant’s townscape witness versus the proposed development demonstrated that in most viewpoints the appeal scheme would sit comfortably within the mass and height of these historical structures. While I acknowledge only the steel frame of one of the gasholders remains today, the fact that the appeal site accommodated large industrial structures over such a long period is a relevant material consideration which further supports the principle of tall buildings on the site”. (our emphasis)*

- 1.27 Paragraph 58 of TP001, continues:

- *In addition, even if the gasholders had been included within the identification of existing tall buildings within the borough, not all tall buildings are considered to set suitable precedents for future developments (see Fig 20 of the Tall Building Annex (2024) for more details). Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation (SINC), low rise context and in an area with limited accessibility to public transport, N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall buildings developments. The consideration of the height of the existing gasholder would not have changed this conclusion.*

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<sup>6</sup> APP/H5390/V/21/3277137

1.28 On this basis, the Council's sieving exercise is not effective or reasonable.

### *SINC*

- 1.29 N13.SA3 is not an adopted SINC. It is proposed for designation through the R22 LP, which remains untested at public examination. The designation is for a local SINC which comprises mostly rough grassland, made contaminated land and utilities infrastructure including potential unexploded ordnance, which will need to be removed to deliver significant remediation and the objectives of N13.SA3. The SINC is a temporary draft designation.
- 1.30 We also note that the presence of designated or emerging SINC's has not prevented TBZs elsewhere in the Borough with TBZ15 – West Ham Station (Bromley-by-Bow Gasworks) and TBZ10 – North Woolwich Road (Royal Docks), both containing SINC's of national (Grade I) or regional (Grade II) importance.
- 1.31 Similarly, TBZ18 – Stratford High Street (Abbey Lane Gas Depot) and TBZ5 – Gallions Reach (Former Beckton Gasworks) both incorporate emerging SINC's<sup>7</sup>.
- 1.32 There is no clear rationale as to why a tall building at seven storeys (21m), for example, would materially create or worsen the impact on the emerging SINC compared to the six storey buildings promoted by Site Allocation N13.SA3.

### *Accessibility*

- 1.33 While the site has a lower PTAL score, it is only 770m from East Ham underground station which is well served by the Circle, District and Hammersmith lines. Several sites identified as suitable for tall buildings by the Council have similar levels of accessibility.
- 1.34 In any event, the London Plan makes clear that limitations in transport accessibility should not automatically prevent development that optimises the use of brownfield land. London Plan Policy H1 requires boroughs to "optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions", including "(a) sites located within 800m of a station or town centre boundary" and "(d) the redevelopment of surplus utilities sites". Both criteria apply to this site.

### *Character Area*

- 1.35 The assertion that N13.SA3 lies within a 'low-rise context' is demonstrably incorrect. The site includes the equivalent 15-storey gasholder structure (46.9mAOD), an elevated concrete bund dumping, subterranean tanks (-4.5m below ground), a c.50m super grid lattice electricity pylon, a pressure reduction system in addition to sewers, water mains, and gas mains - all utility infrastructure. It lies adjacent to a 500m long elevated stretch of the A406 (6 lanes) along the eastern boundary, is 400m from the Barking Town Centre tall building cluster, 57m from the 300m long East Ham depot building and railway infrastructure, and 170m from the 9 to 16 storey Hathaway Crescent Park points blocks. The 10.3ha site is also large enough to create its own character.

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<sup>7</sup> The Greenway SINC and Beckton Riverside SINC

1.36 The mischaracterisation may be a result of the incorrect designation of the Site as ‘terraced houses’ within EB014 and EB026<sup>8</sup> as set out below.

Figure 3 - Newham Characterisation Study (EB014) - Urban Form Quality and Character Map



1.37 The Tall Buildings Topic Paper (TP001), Paragraph 59 continues:

- *Furthermore, it is also noted that the Leigh Road Gasholder within the N13.SA3 Former East Ham Gasworks site allocation is not designated as a heritage asset and could be removed as part of future development. This is another reason why it was not appropriate to include the height of this gasholder in the assessment of existing building heights.*

1.38 This observation is unreasonable and could relate to any building or structure anywhere, and is of no relevance to the question of whether the site is appropriate for tall buildings.

1.39 Any existing tall building could be removed as part of a future redevelopment, but as established by the *Edith Summerskill House*<sup>9</sup> and *Brighton Gasworks* decisions, this would non-undermine its appropriateness as a tall building location with the Secretary of State determining that the presence of a tall structure, either historic or existing, is a material consideration when determining the suitability of a site for tall building development.

<sup>8</sup> Page 117

<sup>9</sup> APP/H5390/V/21/3277137



- 1.40 For *Edith Summerskill House*, both the Inspector and the Secretary of State concluded that the presence of the tall building for over half a century had made a long-standing contribution to the local character and townscape, thereby supporting the principle of a further tall building development on the site.

## Policy D3 Neighbourhood “enhance” areas

*Q3.3 Is policy D3 justified and will the support for a moderate uplift in density in “enhance areas” 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?*

- 1.41 The Framework requires planning policies to support development that makes efficient use of land<sup>10</sup>; particularly where there is an existing or anticipated shortage of land for meeting identified housing needs, and should avoid low-density development to ensure that sites are used to their full potential through adoption of minimum density standards that seek a “significant uplift” in average residential density unless there are strong reasons not to do so<sup>11</sup>.
- 1.42 Policy D3 of the London Plan also expects development to “make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations”.
- 1.43 While the principle of character-led intensification is broadly supported, we remain concerned that the use of the term “moderate uplift” at Criterion 5a would inhibit growth and the key objective of the Plan to deliver new housing. The framing of “moderate uplift” is also not reflective of the scale and density of development that has been consented across certain Neighbourhoods and/or supported by Tall Building Zones.
- 1.44 The identification of N7 Three Mills Neighbourhood for “moderate” uplift does not align with its designation within the Olympic Legacy Opportunity Area, which the London Plan expects to receive large scale development to provide substantial numbers of new housing (c.39,000) and employment (c.65,000 jobs).
- 1.45 In a borough facing acute housing need which is unable to demonstrate a 5YHLS, this framing risks limiting the potential of sites that could otherwise accommodate higher-density development where they follow the design-led process.
- 1.46 The application of “moderate” uplift should be clearly defined to not apply to Site Allocations which are located within “enhance” Neighbourhoods. Instead, Site Allocation should be clearly defined as benefitting from a “transform” uplift that supports “significant” increases in development densities and height.
- 1.47 To ensure consistency with the Framework and the London Plan, we recommend that the policy be revised to reflect the Council’s Spatial Strategy and to refer to a “significant” uplift

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<sup>10</sup> Paragraph 129

<sup>11</sup> Paragraph 130

in density across all Site Allocations, and within Neighbourhoods that are designated within Opportunity Areas.

*Windfall sites outside of Site Allocations which are located within “enhance” areas should not be limited to a “moderate” uplift. The policy wording should be revised to allow greater flexibility, making clear that significant enhancement may be appropriate where supported by robust design-led justification. Q3.4 For policy D3 and relevant N policies to be effective:*

*a) Should part 2 of the Plan explain / describe where the “enhance” areas are in each neighbourhood?*

*b) Should the policies map illustrate geographically the “enhance” areas?*

- 1.48 The current reference to a “moderate” uplift in “enhance” areas is unclear and lacks spatial definition.
- 1.49 To ensure coherence between strategic site allocations and character-led Neighbourhoods, we recommend that the Plan spatially defines “enhance” areas within its Policies Map and that this is replicated by Neighbourhood policies to provide clarity for applicants and decision-makers on the acceptability of development densities and building height.
- 1.50 A similar approach should be adopted for “transform” areas, which should correlate with a “significant” uplift in density and/or height. This should be explicitly stated by Criterion 4 of Policy D3 with “transform” areas applied to all Site Allocations, and Neighbourhoods designated within Opportunity Areas.

## **Appendix 1 – Proposed amendments to Policy D4: Tall Buildings**

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#### D4: Tall buildings

1. Tall buildings in Newham are defined as those at or over 21m (equivalent of 7 residential storeys), measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements).
2. Tall buildings will ~~only~~ be acceptable, subject to detailed design and masterplanning considerations, ~~in areas designated as 'Tall Building Zones'~~. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should be informed not exceed by the appropriate height ranges ~~respective limits~~ set in Table 1 below.

**Table 1: Tall Building Zones**

| Tall Building Zone |                  |                              | Appropriate Height Ranges <del>Maximum</del> | Further guidance  |
|--------------------|------------------|------------------------------|--|---|
| Tall Building Zone | Neighbourhood    | Site allocation(s)           |  |   |
| TBZ1: Forest Gate  | N15 Forest Gate  | N15.SA2 Woodgrange Road West | 32m (ca. 10 storeys)                         | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include a limited tall building element up to 32m (ca. 10 storeys).</li> <li>• Height, scale and massing of development proposals should be assessed to conserve and enhance the significance of heritage assets without detracting from important landmarks and key views set in the Forest Gate conservation area appraisal and management plan, and Woodgrange conservation area appraisal and management plan.</li> </ul> |
| TBZ2: Green Street | N14 Green Street | N/A                          | 50m (ca. 16 storeys)                         | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include limited tall building elements up to 50m (ca. 16 storeys).</li> <li>• Development should create adequate transitions with the low rise context and protect the microclimate of the market.</li> </ul>   |

|                            |                     |   |  |   |
|----------------------------|---------------------|---|--|---|
| TBZ3A:<br>East Ham         | N13 East Ham        | N/A   | 32m (ca. 10 storeys) with opportunity for one tall building element at 50m (ca. 16 storeys) in the defined area. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include tall building elements up to 32m (ca. 10 storeys).</li> <li>• Limited opportunity in the far north east corner to include a tall building element up to 50m (ca. 16 storeys) in the defined area.</li> <li>• Tall building elements should be limited in number and height, scale and massing should be assessed to avoid harm to the significance of relevant heritage assets.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul> |
| <u>TBZ3B:<br/>East Ham</u> | <u>N13 East Ham</u> | <u>N13.SA3</u>  | <u>32m (ca. 10 storeys) with opportunity for one tall building element at 48m (ca. 15 storeys).</u>              | <ul style="list-style-type: none"> <li>• <u>Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</u></li> <li>• <u>Opportunity to include limited tall building elements up to 48m (ca. 15 storeys) in the location of the existing gasholder.</u></li> <li>• <u>Development should be mindful of height transitions when delivering higher densities.</u></li> </ul>   |
| TBZ4:<br>Beckton           | N11 Beckton         | N11.SA1<br>East Beckton Town Centre<br><br>N11. SA3<br>Alpine Way | 32m (ca. 10 storeys) and 40m (ca. 13 storeys) in the defined area.   | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include limited tall building elements up to 32m (ca. 10 storeys) to mark the centre of the town centre.</li> <li>• Opportunity to include limited tall building elements up to 40m (ca. 13 storeys) to mark Beckton DLR station.</li> <li>• Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology.</li> </ul>   |



|                                   |                       |                           |   |   |
|-----------------------------------|-----------------------|---------------------------|---|---|
| TBZ5: Gallions Reach              | N17 Gallions Reach    | N17.SA1 Beckton Riverside | 32m (ca. 10 storeys) and 40m (ca. 13 storeys) and 50m – <u>80m</u> (ca. 16 – <u>27</u> storeys) in the defined areas. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between <u>21m and 32m (ca. 7-10 storeys)</u> <u>30m and 50m (10-20 storeys)</u>.</li> <li>• Opportunity to include tall building elements up to 40m (ca. 13 storeys) in <u>limited</u> locations <u>including but not limited</u> <u>proximity</u> to Gallions Reach DLR station and the riverside to mark the neighbourhood parade, and 50m – <u>80m</u> (ca. 16 – <u>27</u> storeys) in <u>limited</u> locations <u>not limited to</u> <u>in the proximity of the</u> new town centre and DLR station.</li> <li>• Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology.</li> </ul> |
| TBZ6: Albert Island               | N4 Royal Albert North | N/A                       | 40m (ca. 13 storeys)  | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 40m (ca. 13 storeys).</li> <li>• Subject to airport height constraints.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>  |
| TBZ7: King George V / Pier Parade | N1 North Woolwich     | N1.SA2 Rymill Street      | 32m (ca. 10 storeys)  | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include limited tall building elements up to 32m (ca. 10 storeys).</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>  |

|                              |                       |   |                      |   |
|------------------------------|-----------------------|---|----------------------|---|
| TBZ8: Store Road / Pier Road | N1 North Woolwich     | N1.SA1 North Woolwich Gateway                         | 50m (ca. 16 storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include limited tall building elements up to 50m (ca. 16 storeys).</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>  |
| TBZ9: Royal Albert North     | N3 Royal Albert North | N3. SA1 Royal Albert North                            | 32m (ca. 10 storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 32m (ca. 10 storeys).</li> <li>• Subject to airport height constraints.</li> <li>• Scale and massing should reference the emerging context of Royal Albert Wharf, the Connaught Hotels and the Royal Albert Quay emerging office complex.</li> </ul> |
| TBZ10: North Woolwich Road   | N2 Royal Victoria     | N2.SA1 Silvertown Quays<br>N2.SA3 Connaught Riverside | 50m (ca. 16 storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 50m (ca. 16 storeys).</li> <li>• Subject to airport height constraints.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>  |
| TBZ11: Lyle Park West        | N2 Royal Victoria     | N2.SA2 Lyle Park West                                 | 40m (ca. 13 storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 40m (ca. 13 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>                      |

|                        |                                       |   |   |   |
|------------------------|---------------------------------------|---|---|---|
| TBZ12:<br>Custom House | N5 Custom House                       | N5. SA1 Custom House - Land surrounding Freemasons Road<br>N5.SA2 Custom House – Coolfin North    | 32m (ca. 10 storeys) and 50m (ca. 16 storeys) in the defined area.  | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include tall building elements up to 32m (ca. 10 storeys).</li> <li>• Limited opportunity for tall building elements up to 50m (ca. 16 storeys) to mark Custom House station and the link to the Excel conference centre.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul> |
| TBZ13:<br>Canning Town | N4 Canning Town and N2 Royal Victoria | N4.SA1 Canning Town East<br><br>N4.SA2 Silvertown Way East<br><br>N4.SA3 Canning Town Holiday Inn | 50m (ca. 16 storeys) and 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in the defined areas. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) in most of the site and between 9m and 21m (ca. 3-7 storeys) to the eastern part of the tall building zone.</li> <li>• In the north east of the Tall Building Zone, a limited number of tall building elements up to 40m (ca. 13 storeys) could be delivered subject to careful transition to</li> </ul>   |

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|                      |               | <p>N4.SA4<br/>Limmo</p> <p>N4.SA5<br/>Canning<br/>Town<br/>Riverside</p> <p>N2.SA4<br/>Thameside<br/>West</p> |                      | <p>the lower rise residential development to the east.</p> <ul style="list-style-type: none"> <li>• To mark Canning Town station and district centre, tall buildings, with elements of up to 100m (ca. 33 storeys) are suitable. It is considered that the existing cluster should be the highest point and all new tall elements should step down from this central cluster.</li> <li>• This step down should be marked at N5.SA4 Limmo and N5.SA5 Canning Town Riverside where there are limited opportunities for tall building elements up to 60m (ca. 20 storeys).</li> <li>• In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of up to 50m (ca. 16 storeys), could be integrated carefully to aid wayfinding and mark special locations.</li> <li>• Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline. Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology.</li> </ul> |
| TBZ14:<br>Manor Road | N6 Manor Road | N/A   | 32m (ca. 10 storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include limited tall building elements up to 32m (ca. 10 storeys).</li> <li>• Development should be mindful of height transitions</li> </ul>  |

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|                         |                |   |  | when delivering higher densities.  |
| TBZ15: West Ham Station | N7 Three Mills | N7.SA2 Twelvvetrees Park and Former Bromley By Bow Gasworks | 50m (ca. 16 storeys) and <del>302m</del> <u>– 60m</u> (ca. 10 <u>– 20</u> storeys) and 100m (ca. 33 storeys) in the defined areas. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between <u>30m – 60m</u> <del>21m and 32m</del> (ca. <u>107-210</u> storeys), except in the immediate context of the listed gasholders where prevailing heights should be between <u>239m</u> and <u>421m</u> (ca. <u>73-137</u> storeys).</li> <li>• <del>In the immediate context of the listed gasholders, opportunity to include limited tall building elements of up to 32m (ca. 10 storeys).</del></li> <li>• <del>Along the railway line and Bow Creek (River Lea) and to mark West Ham station,</del> <u>There is</u> opportunity to include limited tall building elements of up to 100m (ca. <u>335</u> storeys), which are sufficiently spaced to allow for views and space around the listed gasholders.</li> <li>• In the rest of the Tall Building Zone, opportunity to include limited tall building elements of up to <u>650</u> m (ca. <u>2016</u> storeys).</li> <li>• Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set in the Three Mills conservation area appraisal and management guidelines.</li> <li>• All taller buildings should be integrated carefully to aid wayfinding and mark special locations.</li> <li>• Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses.</li> </ul> |



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| TBZ16:<br>Abbey Mills | N7 Three Mills | N7.SA1<br>Abbey Mills | 40m (ca. 13<br>storeys) | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 40m (ca. 13 storeys).</li> <li>• Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station. Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses.</li> </ul> |
|                       |                |                       |                         | <ul style="list-style-type: none"> <li>• Opportunity to include tall building elements up to 40m (ca. 13 storeys).</li> <li>• Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station.</li> <li>• Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses.</li> </ul>  |

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| TBZ17:<br>Plaistow<br>Station      | N9 West Ham<br>and N10<br>Plaistow                    | N9.SA1<br>Plaistow<br>North                              | 40m (ca. 13<br>storeys)<br>and 60m<br>(ca. 20<br>storeys) in<br>the defined<br>area. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys) on the north-western part of the site and 21m and 32m (ca. 7-10 storeys) nearer Plaistow Station and Local Centre.</li> <li>• Opportunity to include limited tall building elements up to 60m (ca. 20 storeys) to mark Plaistow Station.</li> <li>• Heights should reduce, with opportunities for limited tall building elements of 40m (ca. 13 storeys) allowing for a sensitive transition to the low rise residential context to the north-west of the tall building zone.</li> <li>• Development including tall buildings in this zone must assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.</li> </ul> |
| TBZ18:<br>Stratford<br>High Street | N7 Three Mills<br>and<br>N8 Stratford<br>and Maryland | N7.SA3<br>Sugar House<br>Island<br><br>N8.SA3<br>Greater | 50m (ca. 16<br>storeys)<br>and 100m<br>(ca. 33<br>storeys),<br>60m (ca. 20           | <ul style="list-style-type: none"> <li>• Prevailing heights should be between <del>30m</del>21m and <del>60m</del>32m (ca. <del>10-20</del>7-10 storeys), except at the sensitive edges of the tall building zone, where prevailing heights should be</li> </ul>  |

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|                          |                           | <p>Carpenters District</p> <p>N8.SA4 Stratford High Street Bingo Hall</p> <p>N8.SA7 Rick Roberts Way</p> <p>N8.SA8 Bridgewater Road</p> <p>N8.SA9 Pudding Mill</p> | <p>storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.</p> | <p>between 9m and 21m (ca. 3-7 storeys).</p> <ul style="list-style-type: none"> <li>• Opportunity to include limited tall building elements up to 50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas.</li> <li>• Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number.</li> <li>• Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character.</li> <li>• Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views, including views set in Stratford St John's conservation area appraisal and management plan and Sugar House Lane conservation area appraisal and management plan.</li> <li>• <del>Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.</del></li> <li>• Careful consideration is required for the location of tall buildings, particularly south of the waterways to avoid overshadowing impact on watercourses.</li> </ul> |
| TBZ19: Stratford Central | N8 Stratford and Maryland | N8.SA1 Stratford Central   | 60m (ca. 20 storeys) and 100m  | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) except along the</li> </ul>  |

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|  |  | <p>N8.SA2<br/>Stratford<br/>Station</p> <p>N8.SA5<br/>Stratford<br/>Town Centre<br/>West</p> <p>N8.SA6<br/>Stratford<br/>Waterfront<br/>South</p> | <p>(ca. 33<br/>storeys)<br/>and 32m<br/>(ca. 10<br/>storeys) in<br/>the defined<br/>areas.</p> | <p>sensitive edge of the<br/>Broadway where prevailing<br/>heights should be between<br/>9m and 21m (ca. 3-7 storeys).</p> <ul style="list-style-type: none"> <li>• Opportunity to include tall building elements of up to 60m (ca. 20 storeys) in most of the Tall Building Zone.</li> <li>• To mark Stratford Station, Stratford International station, Westfield Avenue and the urban edge of Queen Elizabeth Olympic Park at International Quarter and Stratford waterfront, a limited number of tall building elements of up to 100m (ca. 33 storeys) could be provided.</li> <li>• Along the sensitive edge of the Broadway, heights should be reduced with opportunity for limited tall building elements of up to 32m (ca. 10 storeys).</li> <li>• Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character.</li> <li>• Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views, including views set in Stratford St John's conservation area appraisal and management plan.</li> <li>• Impacts on London View Management Framework (LVMF) views should be tested to ensure that tall buildings will result in no harm on the protected vistas.</li> <li>• Development including tall buildings in this zone should assess their visual and</li> </ul> |
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|                                     |                           |                               |  | townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.   |
| TBZ20: Chobham Manor / East Village | N8 Stratford and Maryland | N8.SA10 Chobham Farm North    | 50m (ca. 16 storeys) and 32m (ca. 10 storeys) in the defined area. | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys).</li> <li>• Opportunity to include tall building elements up to 50m (ca. 16 storeys) and 32m zone (ca. 10 storeys) in the defined area.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> <li>• Impacts on London View Management Framework (LVMF) views should be tested to ensure that tall buildings will result in no harm on the protected vistas.</li> </ul> |
| TBZ21: Excel West                   | N2 Royal Victoria         | N2.SA5 Excel Western Entrance | 40m (ca. 13 storeys)   | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include a tall building element up to 40m (ca. 13 storeys) to the west of the site.</li> <li>• Development should be mindful of height transitions when delivering higher densities.</li> </ul>   |
| TBZ22: Thameside East               | N3 Royal Victoria         | N/A                           | 50m (ca. 16 storeys)   | <ul style="list-style-type: none"> <li>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).</li> <li>• Opportunity to include tall building elements up to 50m (ca.16 storeys).</li> <li>• Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology.</li> </ul>   |

3. All tall buildings should be of high quality design and environmental standards, and:
- a. address the criteria set by the London Plan Policy D9 section C; and



- b. achieve exemplary architectural quality and make a positive contribution to the townscape through volumetric form and proportion of the mass and through architectural expression of the three main parts of the building: a top, middle and base; and
  - c. address London Plan Policy D9 section D when tall buildings fall within designated town centres and public viewing galleries at the higher levels are viable and might offer an opportunity for a view across the borough and London; and
  - d. be independently assessed by Newham Design Review Panel and any future Community and/or Youth Design Review Panel, appointed by the Local Planning Authority.
4. In addressing the relationship of the proposed tall building with its context:
- a. the footprint of tall building should help to define new green spaces and integrate the development with the existing urban pattern or establish new routes that reinstate historic urban grain; and
  - b. the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street; and
  - c. articulation and set-backs should be used to emphasise the relationship between the horizontal (street context) and the vertical (tall building), and to contribute to securing positive amenity spaces and a suitable micro-climate around the building.

#### Supporting text:-

- Development proposals for building heights that depart from the parameters set by the Local Plan will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development and the proposals must address the criteria set by the London Plan Policy D9 section C.

#### Planning Obligations:

- Free to enter publicly-accessible areas in tall buildings may be secured where in appropriate locations and in line with the policy requirements.