



Quod

**R22 Local Plan
Matter 4:
Neighbourhood
Policies and
Allocations -
N8**

**Newham Local
Plan**

St William Homes LLP

06TH NOVEMBER 2025

Q253076

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Introduction

- 1.1 On behalf of St William Homes LLP ('St William'), Quod submits this hearing statement in respect of Matter 4 Neighbourhoods and Allocations in response to IN3: Inspector's Matters, Issues and Questions; and Hearings Programme issued by the Inspector on 9th October 2025.
- 1.2 Continuing St William's engagement in the Regulation 18 (February 2023) and Regulation 19 (September 2024), this hearing statement is made in respect of the following Neighbourhoods and Site Allocations:
 - N17 Gallions Reach / N17.SA1 Beckton Riverside
 - N7 Three Mills / N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks
 - N8 Stratford and Maryland / N8.SA7 Rick Roberts Way
 - N13 East Ham / N13.SA3 Former East Ham Gasworks

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:

- (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.

Introduction

1.3 The following response has been prepared by DP9 in relation to parts (b), (c), (d) and (k) of Q4.10.

1.4 N8.SA7 was originally allocated within the LLDC Local Plan (2021) as 'Site Allocation A3.6: Rick Roberts Way'. This identified the site as a "*comprehensive, mixed-use development of residential with education uses, including the provision of a primary school and open space*". It indicated a capacity of 750 homes.

Rick Roberts Way (Stratford Gasworks)

1.5 Our client's site forms the south-eastern portion of the wider site allocation comprising c. 0.95ha. A maximum of 300 homes for this portion of the site was identified within the site allocation.

1.6 In November 2024, planning permission was granted by the LLDC (ref: 23/00457/FUL) for the redevelopment of the site for 245 dwellings (Use Class C3) and associated infrastructure, public realm, access, cycle and car parking and works to the existing on-site Pressure Reduction Station and gasholder voids.

1.7 Since planning permission was granted, our client has undertaken pre-application discussions with Officers at the London Borough of Newham in order to further optimise the site. Initial discussions suggest that up to 306 dwellings could be delivered on the site; an increase of 61 dwellings compared to the consented scheme.

1.8 The increase in unit numbers is primarily facilitated through efficiency of the building layouts and footprints, as well as an increase in height of 20 storeys on the tallest building (B1). Compared to the consented scheme, the revised height of Block B1 is an increase from 3 storeys.

1.9 The revised height has been carefully considered and tested in the context of the surrounding conservation area and nearby listed buildings and is considered to be appropriate given the position of the tallest element being the furthest away from these sensitive heritage assets including the cottages along Abbey Lane.

N8.SA7 Site Allocation

1.10 We also note that in draft Policy D4 'Tall Buildings', the Site Allocation is included within Tall Building Zone 'TBZ18'. Referring to the 'Map of Newham's Tall Building Zones' in the Regulation 19 version of the Local Plan, this considers that opportunities for heights of up to 50m (16 storeys) are appropriate.

1.11 In light of the above and having secured planning permission for height which is greater than currently prescribed within the Local Plan documentation (plus the positive discussions that have been undertaken to date with Officers regarding the revised proposals for 20 storeys), we therefore request that the heights referred to in the Design Principles section of the Site Allocation are amended to allow heights of up to 20 storeys.

1.12 We enclose tracked changes to N8.SA7.SA3 at **Appendix 1**.

Site Capacity Estimate

1.13 One of our client's key concerns relates to the Site Capacity Study (ED003A), which is a newly released part of the evidence base not published at Regulation 18 and 19 stage. This has direct relevance to the resulting Site Allocations.

1.14 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 and risks constraining the delivery potential of the site if the output of the Capacity Testing exercise is translated to the approach to the Site Allocation (which it appears to be).

1.15 We also note that the ED003A results in significantly less homes being delivered across the draft Site Allocation, reduced from the previous 750 (Site Allocation SA3.6), to 389. This is a reduction of 48%. Whilst our client's part of the wider Site Allocation will contribute c.77% towards the revised identified capacity within the Site Capacity Study, there are concerns that the proposed capacity reduction does not accurately reflect the number of homes that could reasonably be delivered across the Site Allocation. We therefore request that the figures are revised to reflect the previous 750 units so as not to unnecessarily prevent or restrict further development of our client's site, or wider Site Allocation. The current Site Capacity Study is at risk of doing this.

Conclusion

1.16 Our primary concern remains that the 'Site Capacity Study' and the apparent implications for the resulting Site Allocation appears to significantly underplay the reality of the number of homes that can be delivered. This has the following implications, which brings into question the soundness of the Plan:

- Underestimating the Site's ability to deliver new homes towards LBN's and the London Plan's housing targets.
- Limiting building heights and the resulting capacity of the Site Allocation, constraining development potential.

Appendix 1 – N8.SA7 tracked changes

N8.SA7 Rick Roberts Way	
Site address	Land between Rick Roberts Way to the north and Greenway to the south
Neighbourhood	Stratford and Maryland
Site area	4.3 hectares
Public Transport Accessibility Level	2 – 5 2 – 6 (2031)
Flood Risk	The site is shown to be at significant risk of flooding in Flood Zone 2 and Flood Zone 3, as well as being at pluvial flood risk in the 0.1% AEP event and also being at risk if the Thames were to breach its bank and defences were to fail.
Heritage Designations	River Lea Archaeological Priority Area (Tier 3) In the vicinity of: Three Mills Conservation Area Sugar House Island Conservation Area 116 – 130 Abbey Lane (Grade II) Gate Lodge at Abbey Mills (Grade II) Former Superintendent House at Abbey Mills (Grade II) Chimney Stacks at Abbey Mills (Grade II) Abbey Mills Pumping Station (II*)
Utilities	Underground cable route
Natural environment Designations	Air Quality Management Area In an area of deficiency of access to all types of parks, except metropolitan and small parks and of under provision to publicly accessible open green space by head of population in 2038. Adjacent to Greenway Site of Importance for Nature Conservation and Metropolitan Open Land
Map	
Existing uses	Temporary community facility, vacant land, storage use and gasholder infrastructure.
Development principles	Residential, employment uses, sports and recreation uses, education and open green space. The employment use should be consistent with Local Plan Policy J1 and should prioritise light industrial floorspace. Development should protect and enhance existing sports and recreation uses in accordance with Local Plan Policies SI1 and SI3.

	<p>The 1.2 hectares of open green space should be provided on the publicly owned land.</p> <p>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)(2025).</p>
Design principles	<p>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</p> <p>Building heights should range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to 650m (ca. 2016 storeys). Massing should step down towards the east to sensitively integrate with the low rise context of the listed cottages on Abbey Lane.</p> <p>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. The design and layout of the site should provide new and improved routes for walking and cycling including two routes either side of the school site to connect the Greenway and Rick Roberts Way. Improvements should also be made to provide a fully accessible connection between Abbey Lane and the Greenway and the stairs in the south eastern corner of the site.</p> <p>Development should provide a consistent frontage onto the Stratford High Street and the junction should be safe and welcoming. Development should improve walking and cycling conditions and the public realm on Rick Roberts Way, the Stratford High Street and Abbey Lane. Development should reinforce the legibility of the existing street hierarchy through appropriate scale and massing on primary and secondary streets, creating frontages to frame Rick Roberts Way and the Stratford High Street.</p> <p>Development should conserve and enhance the significance of the listed cottages to the south east of the site and the character of the Three Mills conservation area. Height, scale and massing should avoid impact on important landmarks and key views set out in the Three Mills Conservation Area Appraisal and Management Plan and the Sugar House Lane Conservation Area Appraisal and Management Plan.</p> <p>Design measures should ensure an air quality neutral approach and minimise exposure to poor air quality, particularly on Rick Roberts Way and the Stratford High Street.</p> <p>The design and layout of the site should minimise the impact of noise from the Pressure Reduction System on residential amenity and take into account the underground cable route.</p> <p>Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. The design and layout of the site</p>

	<p>should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7.</p>
<p>Infrastructure requirements</p>	<p>Development should address existing open green space deficiencies by providing a small open green space with a minimum of 1.2 hectares. In addition to the open green space, development should provide publicly accessible play space in the form of a Locally Equipped Area for Play and a Local Area for Play, which should be playable public realm. Development should provide a sports-lit Multi-Use Games Area, on the publicly owned land, unless delivered at N8.SA5 Stratford Town Centre West. Play space should meet the requirements of Local Plan Policy GWS5.</p> <p>Development should meet the need for school places by providing a Special Educational Needs and Disability school on the publicly owned land in accordance with Local Plan Policy SI4.</p> <p>Development should deliver sports hall provision. Provision should meet the needs identified in the Built Leisure Needs Assessment (2025) (2024) and be delivered in accordance with the requirements of Local Plan Policies SI2 and SI3.</p> <p>The Pressure Reduction Station, electricity mast and sub-station should be retained or re-provided on the site. The district heating network connection to the north west of the site should be retained.</p>
<p>Phasing and implementation</p>	<p>Phasing of the site should take account of the likely requirement for a water supply infrastructure upgrade through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.</p> <p>The potential impact of the underground cable route on design and layout should be taken into account at the pre-application stage through early engagement with National Grid.</p> <p>Medium term</p>