

EXAMINATION IN PUBLIC OF NEWHAM LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF SILVERTOWN HOMES LTD

06/11/2025

Matter 3 QUESTION 3.2

Matter 4 QUESTION 4.4

Matter 8 QUESTION 8.1

Introduction

- 1.1 This Hearing Statement has been prepared by DP9 Ltd on behalf of Silvertown Homes Ltd ('SHL') specifically in response to Question M3.2 'Tall Building Zones', Question M4.4 'Neighbourhoods and Allocations', and Question M8.1 'J1 Employment and growth – Locations and uses' issued by the Inspector on 9th October 2025.
- 1.2 SHL are the joint owners of the site known as Thameside West, Dock Road, London, E16 (the 'Site').
- 1.3 The Site has been allocated under the proposed site allocation 'N2.SA4 Thameside West' in the draft London Borough of Newham ('LBN') New Local Plan, which this Hearing Statement focusses on.
- 1.4 This Hearing Statement is submitted following SHL's earlier representations to the Regulation 18 and 19 stages of the draft New Local Plan. This Hearing Statement seeks to reinforce the points made in the previously submitted representations and requests modifications to ensure the policies are justified, effective and consistent with national and regional policy.
- 1.5 As detailed in SHL's Reg 18 and Reg 19 representations, importantly the Site benefits from an existing implemented Hybrid Planning Permission (the 'HPP') approved by the Mayor of London in 2021 (ref. 18/03557/OUT) which approved c.5,000 homes and a range of employment and community uses, including tall buildings up to 98m in height.



Question 3.2 – Tall Building Zones

2.1 Questions 3.2 states:

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?

2.2 The policy D4 Table locates Thameside West within TBZ13: Canning Town and states:

- *“Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).”*
- *“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.”*

2.3 The heights stated in Policy D4 are inconsistent with the approved HPP, which consented a range of building heights up to 98m AOD. The application of a 50m building height limit on the Site would significantly constrain the development potential of the Site, reduce housing capacity and would ultimately render the Site unviable and undeliverable. The HPP was assessed extensively from a townscape, design, heritage and environmental impact perspective based on considerable evidence in the planning application and found to be acceptable.

2.4 In order to be sound, the maximum height for Thameside West stated in TBZ13 and indicated on the Map of Newham’s Tall Building Zones (page 79) should be adjusted to recognise the HPP to allow heights up to 100m (purple) in accordance with Parameter Plan 04 ‘Development Zones Maximum Height Limit’ [ref. A-SL-011-xx-04 Rev 04] approved pursuant to the HPP (Appended for clarity).

Question 4.4: Neighbourhoods and Allocations - N2.SA4 Thameside West

3.1 The following aspects of Question 4.4 are of relevance to the Site:

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? In particular:

b) The requirements relating to the location and design of employment uses on sites N2.SA2, N2.SA3 and N2.SA4 and the relationship with the adjoining existing industrial uses including SIL.

c) The requirements relating to tall buildings.

d) The assumption that around 2,400 homes will be built on N2.SA4 between 2028 and 2038.



- 3.2 Relevant to the Site Allocation is the Topic Paper on Site Capacity Study, which is a newly released part of the evidence base not published at Reg 18 or Reg 19 stage, that has direct relevance to the resulting Site Allocations. SHL's primary concern is that the Capacity Testing undertaken in relation to Thameside West significantly underplays the reality of the number of homes already consented on the Site by ignoring the HPP.
- 3.3 There is consequently a large disparity between the Site Capacity Study for Thameside West which states an indicative site capacity of 2,961 homes (336,000 sqm GEA of residential) compared to the HPP approval for up to 5,000 homes (451,141 sqm GEA of residential), as well as disparity between other employment and community uses, as summarised below:

Land Use	LBN Capacity Testing	Thameside West HPP Max Proposals	Difference
Residential	336,000 sqm (2,961 resi units)	451,141 sqm (c.5,000 resi unit)	HPP = +115,141 sqm +2,039 resi units
Commercial	3,887 sqm	7,368 sqm Retail 1,790 sqm Community and leisure TOTAL = 9,158 sqm	HPP = +5,271
Education	3,944 sqm	4,272 sqm 4FE primary school 993 sqm nursery Total = 5,265 sqm	HPP = + 1,321 sqm
Employment	21,479 sqm	19,491 sqm	HPP = -1,988 sqm

All areas expressed as sqm GEA

- 3.4 Whilst SHL welcomes the principle of Site Allocation N2.SA4 confirming the strategically important status of Thameside West, SHL maintains that the site allocation should reflect the reality of the consented and implemented development coming forwards in the HPP planning permission to ensure the Local Plan is sound.
- 3.5 Taking the above into account, SHL propose the following amendments to the N2.SA4 Site Allocation, to reflect the development approved under the HPP.



N2.SA4 Thameside West – Description (page 389)

- 3.6 Relevant planning history has been removed from the description. However, given the direct relevance of the planning history we recommend that the following planning permissions are referenced:
- Operational Works Permission (17/02554/FUL)
 - Hybrid Planning Application (18/03557/OUT) – approved and implemented.
 - Silvertown Tunnel Development Consent Order - noting the tunnel is now completed and open.

N2.SA4 Thameside West: Map (page 390)

- 3.7 The N2:SA4 Map is not aligned with the approved HPP, particularly in relation to the location and extent of the Strategic Industrial Location (SIL).
- 3.8 The SIL location on the Map is in the same location of the Phase 1 detailed component granted full planning permission under the consented and implemented HPP, which comprises 401 homes and c.3,600 of flexible employment and 230 sqm of retail.
- 3.9 The HPP approves a new employment plot (known as Plot V in the HPP consented parameter plans) in the location between the DLR and Silvertown Way. However, this has not been captured by an employment designation on the Map.
- 3.10 To be accurate and sound, the Map and SIL location should be amended to reflect the HPP, to remove the SIL allocation from the Site.
- 3.11 Please refer to Appendix 1 for relevant extracts from the HPP approved plans.

N2.SA4 Thameside West – Development Principles (page 391)

- 3.12 As per the point raised above regarding the HPP approving 401 homes and employment on the SIL, the 'Development Principles' should be updated to delete the following wording:

~~*"The employment uses should be consistent with Local Plan Policy J1, and within the Strategic Industrial Location should prioritise industrial large scale industrial and small scale light industrial, suitable for clean, green and low carbon industries, cultural and creative production / manufacturing and digital and high technology industries."*~~



N2.SA4 Thameside West – Design Principles (page 391)

- 3.13 In terms of building heights, the ‘Design principles’ text describes appropriate heights as ranging between 21-32m (c.7-11 storey buildings) with some buildings being as tall as 50m in height (c.16 storeys). We assume that this is one of the outputs of the Capacity Study, which significantly underestimates the capacity of the site compared to the HPP.
- 3.14 In particular, as set out above, the stated heights are inconsistent with the approved HPP, which consented a range of building heights up to 98m AOD. The application of a 50m building height limit on the Site would significantly constrain the development potential of the Site, reduce housing capacity and would ultimately render the Site unviable and undeliverable. The HPP was assessed extensively from a townscape, design, heritage and environmental impact perspective based on considerable evidence in the planning application and found to be acceptable.
- 3.15 In order to be sound, the Site Allocation needs to be amended to increase the maximum building heights to reflect the HPP being up to 98m across the Thameside West Site Allocation in accordance with Parameter Plan 04 ‘Development Zones Maximum Height Limit’ [ref. A-SL-011-xx-04 Rev 04] approved pursuant to the HPP.

Question 8.1 ‘J1 Employment and growth – Locations and uses’

- 3.1 Question 8.1 states:

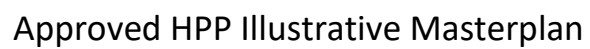
“Q8.1 Is the locational approach to the different types of employment uses set out in policy J1 parts 2(a) to 2(f) and J2 part 3 justified and consistent with the London Plan and will it be effective in helping to meet the identified needs for different types of employment floorspace?”

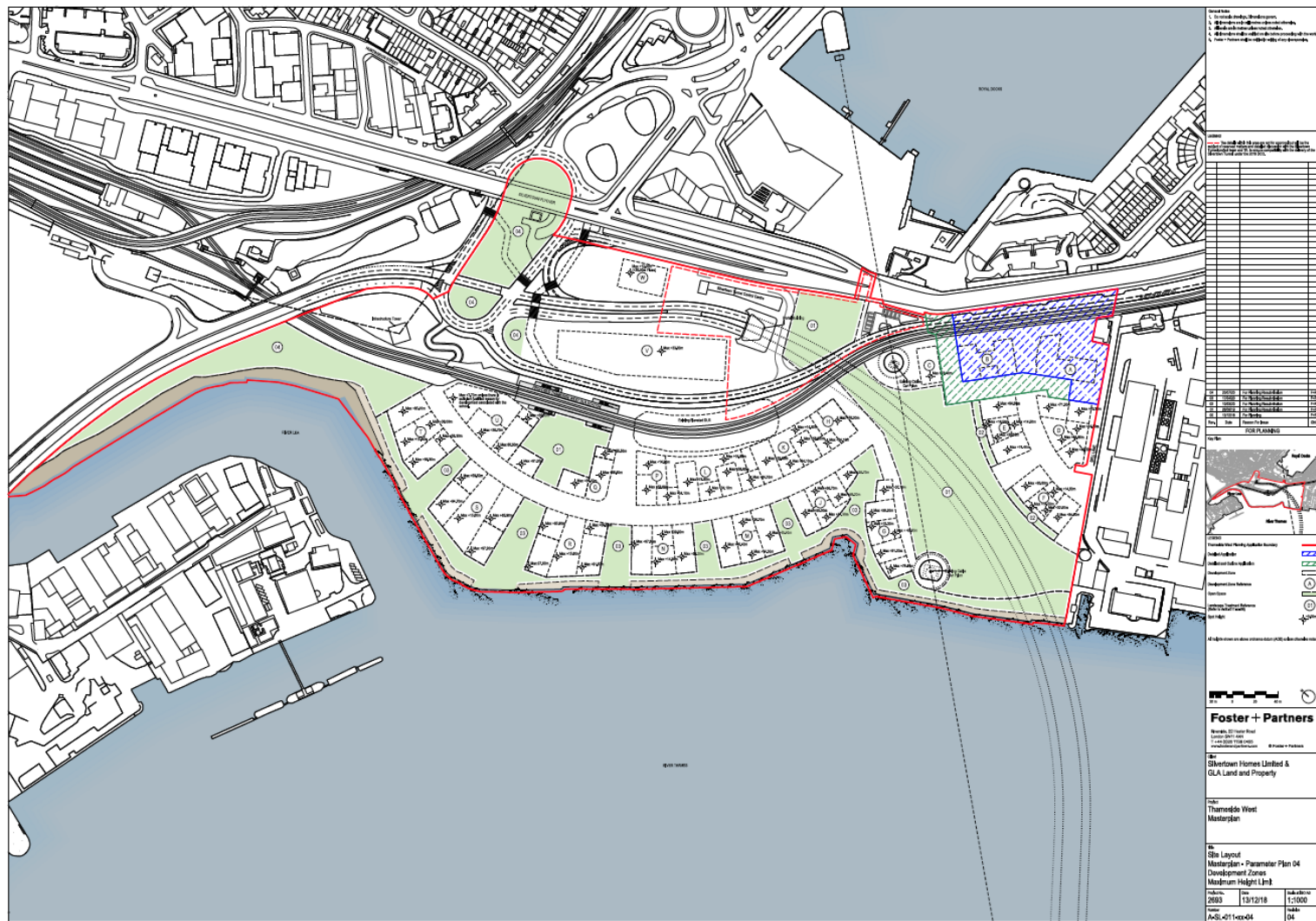
- 3.2 As raised at Reg 18 and Reg 19 stage, Policy J1 Table 6 Strategic Industrial Locations (SILs) includes SIL 3 Thameside West with the Priority Uses described as ‘Large scale industrial and small scale light industrial’, with the ‘Functional requirements’ stating ‘No residential floorspace is permitted in these designations’.
- 3.3 As raised above, this policy allocation is fundamentally at odds with the reality of the approved and implemented HPP, which consented the Phase 1 detailed component (which comprises 401 homes and c.3,600 of flexible employment and 230 sqm of retail) on the SIL land.
- 3.4 To be accurate and sound, Policy J1 should be amended to remove SIL3 from Table 6 and the ‘Map of Newham’s Employment Designations’ on page 188.



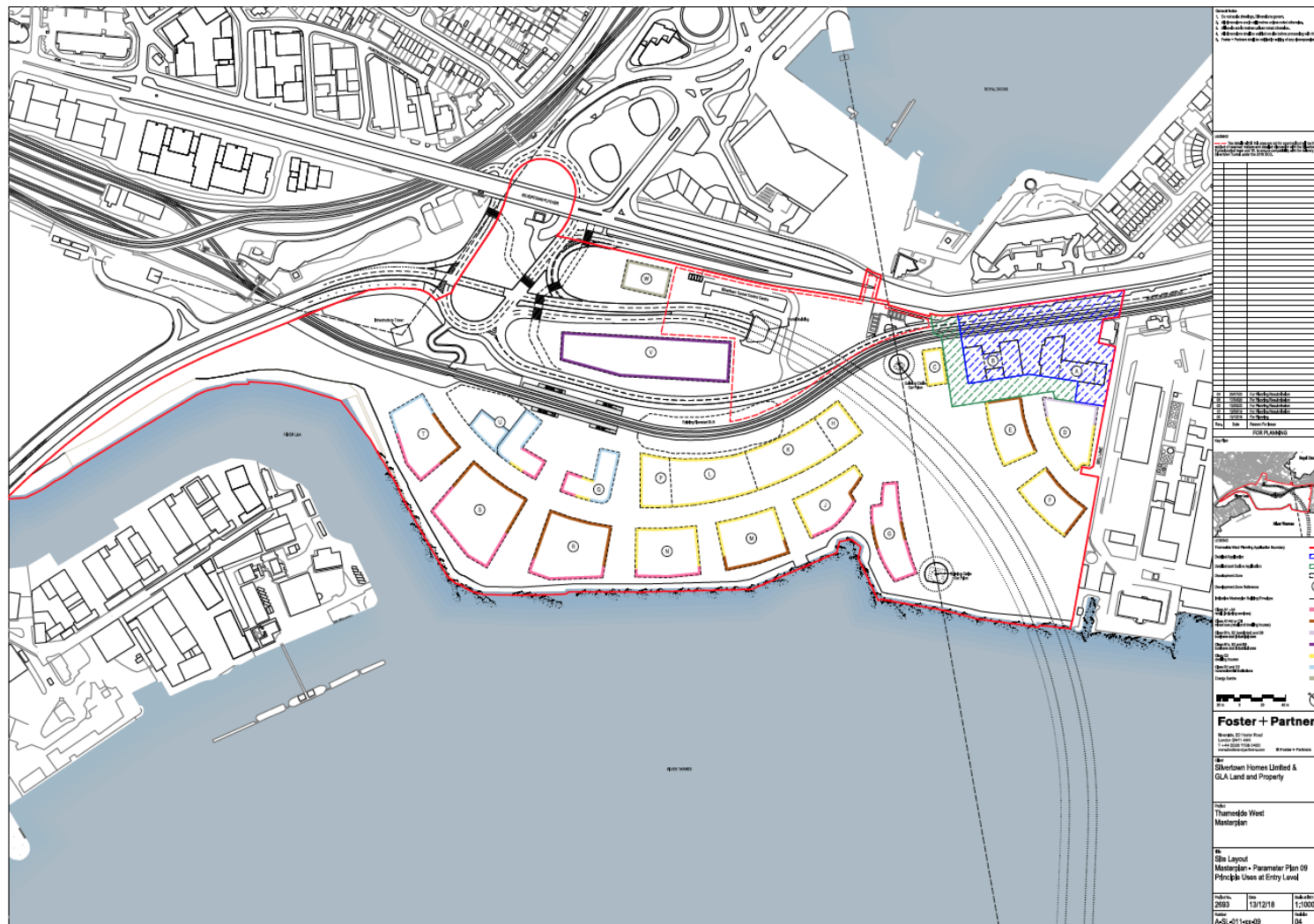
Conclusions

- 4.1 In conclusion, SHL requests that Policies D4, N2.SA4 and J1 are amended based on the matters detailed above relating to the SIL allocation and building heights for Thameside West, which are necessary to align the Local Plan with the HPP, to ensure the delivery of much needed new housing is not prejudiced and to ensure the Local Plan is sound, effective and deliverable.
- 4.2 As drafted, SHL consider that the Local Plan policies so far as they relate to Thameside West 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 Neighbourhood. However, SHL consider that the Local Plan policies and site allocation can be made sound through the amendments set out in this Hearing Statement to align with the HPP and we invite the Inspector to recommend Main Modifications accordingly.
- 4.3 Please contact Chris Gascoigne at DP9 Ltd (chris.gascoigne@dp9.co.uk) with any questions.

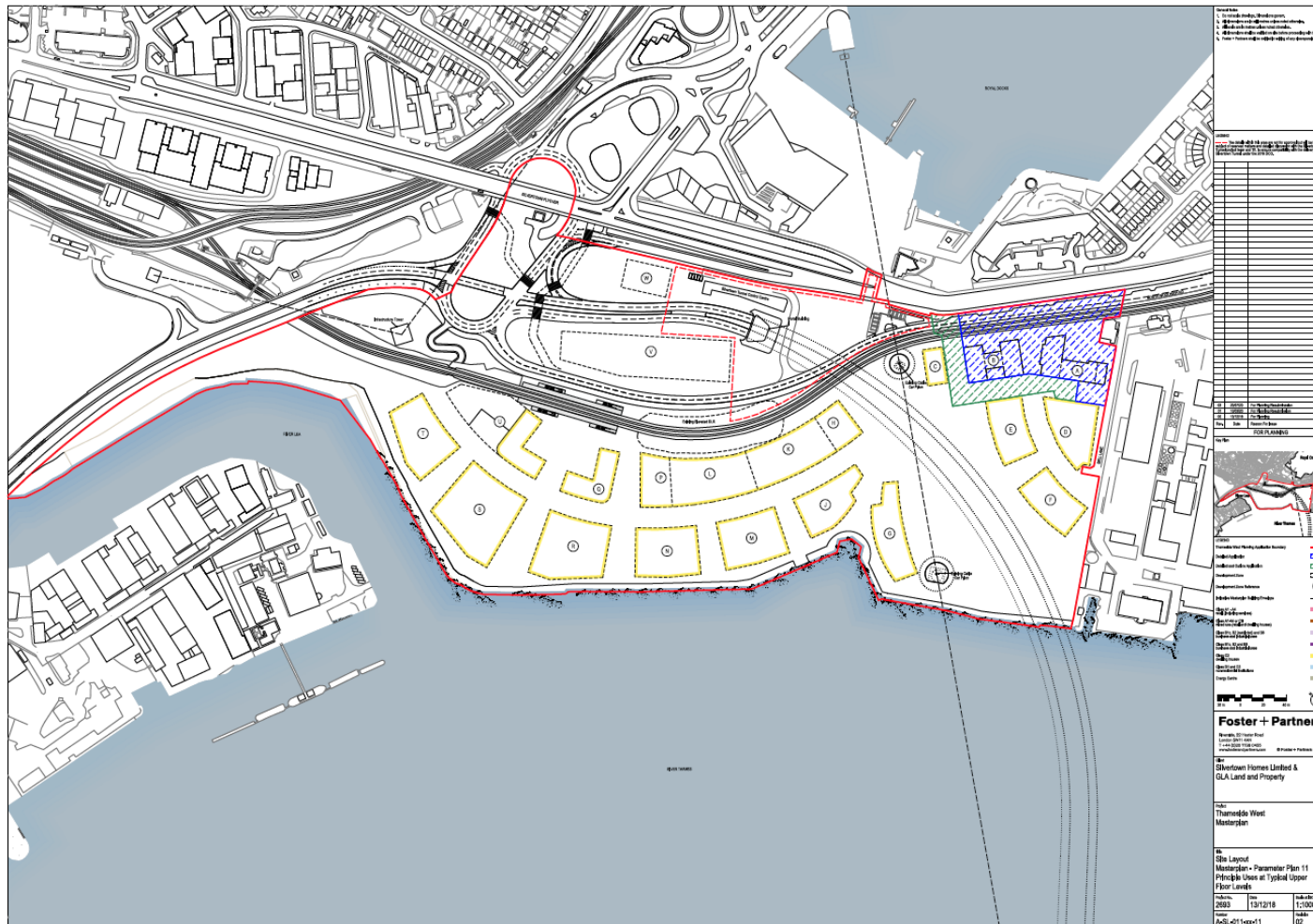




Approved HPP Parameter Plan - Maximum Heights



Approved HPP Parameter Plan - Entry Level Uses



10



HPP Illustrative Massing



HPP Phase 1 Image



HPP Illustrative Image