

EXAMINATION IN PUBLIC OF NEWHAM LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF THE SILVERTOWN PARTNERSHIP LLP

27/11/2025

Matter 9 QUESTION 9.3

Introduction

1. This Hearing Statement has been prepared by DP9 Ltd on behalf of The Silvertown Partnership LLP ('TSP') specifically in response to Matter M9 'Town Centres', issued by the Inspector on 9th October 2025, so far as the matter relates to the site known as Silvertown Quays (Land Bounded by Royal Victoria Dock, Connaught Bridge, Mill Road and North Woolwich Road), London, E161UR (the 'Site').
2. This Hearing Statement addresses Question 9.3:

Q9.3 Are the changes to the existing town centre network proposed in policy HS1 justified, consistent with the London Plan and will they be effective in helping to meet identified needs for additional floorspace for main town centre uses? In particular:

c) Creation of four new Local Centres and expansion of three Local Centres on the site allocations specified in policy HS1 part 1(e).

3. Draft Policy HS1 sets out Newham's Town Centres Network and confirms that Silvertown is a Local Centre which, as shown in the draft Policies Map is proposed to be extended to be partially located within the Site.

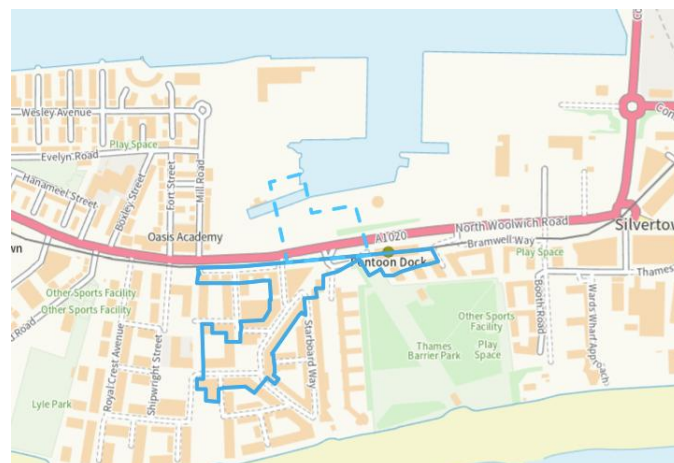


Figure 1 Draft Policies Map Extract showing Local Centre boundary (solid blue line) and proposed extension into Silvertown Quays (dashed blue line)



4. Draft Policy HS1 states that the key functions of the Silvertown Local Centre are to serve local catchment needs for retail, leisure, services and community uses and to support an incidental visitor economy. The majority of Local Centres include only the first function (to serve the local catchment needs for retail, leisure, services and community uses) and the glossary definition of Local Centres states that they 'typically' serve a local catchment. This means that the inclusion of the second incidental visitor function makes Silvertown Quays an 'atypical' Local Centre.
5. This Hearing Statement seeks to reinforce the comments made on behalf of TSP in the Regulation 19 representations and sets out the position that the Local Centre boundary should better align to the geographical extent of town centre uses that are to be delivered on site as part of TSP's development proposals. TSP is concerned that a policy that does not reflect the reality of development that is coming forward on the Site would lack proper justification and not be effective in helping to properly plan for LBN's town centre network.

Context

6. The background to both TSP and the Site Allocation has been set out within Hearing Statement TSP submitted for Matter 4 on 6th November 2025. Key information about the Site's history and the live planning application relating to the Site has been summarised below.
7. The Site benefits from an extant Outline Planning Permission (14/01605/OUT) (the 'OPP') granted in 2016 and authorising c.3,000 homes and up to 266,500 sqm GEA of employment/town centre uses.
8. The extant OPP approves up to 266,500 sqm GEA of non-residential floorspace which includes a range of town centre uses including up to 179,000 sqm GEA of office, up to 10,000 sqm GEA of 'local retail' (defined as A1-A5,) up to 20,400 sqm GEA of food and drink and up to 19,800 sqm GEA of leisure and cultural use. A number of reserved matters approvals (ref. 19/02657/REM, ref. 24/02043/REM and ref. 24/02648/REM) are also linked to the OPP. Appendix 1 sets out the maximum floorspace for each use class within the respective Development Zone (extracted from OPP Condition B4 and updated via a non-material amendment ref: 25/01756/NONMAT).
9. On 21st December 2022, TSP submitted a Hybrid Planning Application (the 'HPA') (ref: 22/02855/OUT) which proposes a maximum of 885,000 sqm GEA of development comprising up to 730,330 sqm GEA of residential (c.7,100 new homes) on the Site in addition to a range of employment generating and town centre uses. Officers have recommended the HPA for approval and it is expected to be determined at the next Strategic Development Committee – 9th December 2025.
10. The HPA provides alternative proposals to the OPP. It is a residential led proposal which is in contrast to the previously consented OPP which sought permission for a higher quantum of non-residential uses. The HPA will transform and regenerate one of the largest and most strategically important brownfield sites in LBN and London as a whole. The HPA will contribute



significantly towards LBN's housing targets by including residential floorspace that is expected to provide up to 7,100 homes, representing an increase of up to 4,100 new homes when compared to the OPP (which approved c.3,000 homes). It will include non-residential uses including Town Centre uses, which are shown based on the Illustrative Masterplan in Figure 2 set out below (colours indicate (predominantly ground floor) non-residential uses – difference in colours relate to character areas).



Figure 2 - Image of the Illustrative Masterplan for HPA

11. The HPA seeks permission for up to 176,332sqm GEA of non-residential floorspace which includes a range of town centre uses including up to 80,705sqm GEA of office (Class E(g)(i)), up to 6,500sqm GEA of retail (Class E(a)), up to 14,000sqm GEA of food and beverage (Class E(b)), drinking establishments (up to 2,000sqm GEA), hot food takeaways (up to 500sqm GEA), up to 5,000sqm GEA of live music venue / theatre, and up to 2,500sqm GEA of cinema. The quantum of non-residential uses both responds to the demand created by the new residential population (c.14,000 people) and the connectivity to the Site created by RVDB which helps activate the unique assets of the Site - Silo D, Millennium Mills and Poncheon Dock. Figure 3 set out below is a character area plan which provides a high-level overview of how the various non-residential uses are distributed across the Site. Appendix 2 shows the proposed maximum permitted area schedule. Figure 3 demonstrates the HPA placemaking and character led approach to land use, prioritising individual aspirations of its five neighbourhoods. Application documents submitted to support the HPA demonstrate that the area which comprises 'Silvertown Centre' will have the highest concentration of town centre uses.



Figure 3 - HPA Character Areas Plan

12. As explained in TSP's Hearing Statement to address Matter 4, the Topic Paper on Site Capacity Study (Examination Document Reference ED003a and ED003b) (the 'Capacity Study'), which is a newly released part of the evidence base not published at Reg 18 or Reg 19 stage, has direct relevance to the Site. TSP has expressed a concern that the Capacity Testing undertaken in relation to Silvertown Quays significantly underplays the reality of the number of homes, other floorspace, footfall and expenditure coming forwards on the Site. The large disparity demonstrates that the Capacity Study does not take into account the HPA which is evidenced in the below table summarising the differences between the HPA and the Capacity Study.

Land Use	LBN Capacity Testing	Silvertown HPA Max Proposals	Difference
Residential	512,603 sqm (4,522 resi units)	730,330 sqm (c.7,100 resi unit)	HPA = +217,727 sqm +c.2,578 resi units
Community and healthcare	1,729 sqm	956 sqm Community 2,000 sqm Health TOTAL = 2,956 sqm	HPA = +1,227
Employment	28,460 sqm	71,705 sqm Mills Quarter Flexible Workspace* 45,000 sqm Silverworks Flexible Employment TOTAL = 116,705 sqm	HPA = +88,245 sqm
Commercial	7,221 sqm	6,500 sqm Retail 14,000 sqm F&B 5,000 sqm Live music/theatre 2,500 sqm Cinema TOTAL = 28,000 sqm	HPA = +20,779 sqm
Education	9,453 sqm	5,000 sqm	HPA = -4,453 sqm



Other		7,000 sqm Hotel	HPA = +7,000 sqm
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All areas expressed as sqm GEA

**Mills Quarter has been consented under OPP*

13. TSP has evidenced in a Leisure, Retail and Office Impact Assessment ('LROIA') submitted in support of the HPA that the quantum of the proposed leisure, retail, food and beverage, drinking establishments, office, hot food takeaways, live music venue / theatre, and cinema floorspace within the HPA scheme is appropriate because of the new local population the Site creates. The LROIA concludes that there is a strong indication that the proposed local shopping offer is of an appropriate scale that will not adversely impact Newham's retail hierarchy and that the offer primarily meets the needs of the new residents at the Site. The LROIA concluded that the introduction of 14,000 new residents and over 6,600 new workers to the Site will introduce significant amounts of new expenditure. Indeed, the HPA Proposed Development will generate extensive flow-on benefits to other Local Centres across the Borough by introducing a new economically active resident and worker populations that will use facilities elsewhere in the Borough, as well as at the Site. In short, the residential floorspace created under the HPA creates the need for the proposed non-residential uses including town centre uses on site, and in addition there will be flow-on benefits to other Local Centres and Town Centres, resulting in an overall net benefit to the Town Centre network.

Question 9.3(c)– Are the changes to the existing town centre network proposed in policy HS1 justified, consistent with the London Plan and will they be effective in helping to meet identified needs for additional floorspace for main town centre uses? In particular:

c) Creation of four new Local Centres and expansion of three Local Centres on the site allocations specified in policy HS1 part 1(e)

14. As set out in the HPA, the Site will provide an 'atypical' Local Centre which will primarily serve the newly created population of circa. 14,000 through providing a local shopping destination focused on the western part of the site, and will also support a visitor destination which will take advantage of the unique setting of Pontoon Dock, the Millennium Mills and the Site's industrial heritage. This is in direct correlation with the two functions for Silvertown Local Centre included in draft Policy HS1 which are fully supported. This combined offer is atypical because the majority of Local Centres as identified in draft Policy HS1 do not have a secondary, visitor orientated function and the draft glossary definition of Local Centres does not include this function in the typical description it provides.
15. The visitor destination aspect of the Local Centre at the Site will support the international visitor destinations at the ExCeL Centre and London City Airport, aligning with the stated objective in The Royal Docks Cultural Placemaking Strategy ('RDCPS') published by the Mayor of London and LBN in May 2021) and The Royal Docks and Beckton Riverside Opportunity Area Planning Framework ('OAPF' published by the Mayor of London and LBN in May 2023) The OAPF confirms that the Site will provide facilities to attract visitors to experience the dock



through a suitable amount of leisure land uses to cater for both residents and visitors alike. The RDCPS confirmed that Silvertown Quays should be both a creative and cultural destination described as a *“London destination for culture and experiences, large scale events and new venues”*¹, which ultimately will reflect the status of Silvertown as an atypical Local Centre as reflected in draft Policy HS1, the extant OPP and the HPA.

16. Therefore, while the wording of draft Policy HS1 itself is supported, the Inspector is asked to consider if amendments to expand the extended Local Centre boundary in the draft Policies Map, which supports draft Policy HS1, are required to make the Plan sound through reflecting the HPA proposals which in turn address the atypical nature of Silvertown Quay’s Local Centre as recorded in draft Policy HS1. TSP is concerned that a policy that does not reflect the reality of development that is coming forward on the Site would lack proper justification and not be effective in helping to properly plan for LBN’s town centre network. However, in TSP’s view these soundness issues could be readily addressed by ensuring the Local Centre boundary is consistent with the HPA proposals.
17. It would be useful to discuss what the exact extent of the amended boundary should be in the Hearing session. While our representations at Regulation 19 stage recommended separating the Local Centres at Royal Wharf and Silvertown Quays, it is accepted in this Hearing Statement that these could be combined providing that the Local Centre boundary on the Policies Map is amended to reflect the HPA’s proposed distribution of town centre uses.

Conclusion

18. As set out in the HPA and draft Policy HS1, the Silvertown Local Centre which is to be extended into Silvertown Quays will provide a local retail, leisure, cultural and F&B uses offer for the benefit of the Site’s community and the other surrounding local communities. The Site will also act as a visitor destination within the context of the wider Royal Docks visitor offer, taking advantage of the unique opportunity of Pontoon Dock, the Millennium Mills and the Site’s industrial-related heritage.
19. In this respect, TSP do not propose any amendment to draft Policy HS1 itself. However, this Hearing Statement suggests that the Silvertown Local Centre boundary as shown on the supporting draft Policies Map could be reviewed to align with the HPA. This would reflect the nature of Silvertown Local Centre coming forward under the HPA, ensuring that the Local Plan is sound.

¹ Page 47.



Appendix 1 OPP Condition B4 and updated via a non-material amendment ref: 25/01756/NONMAT

Zone Use Class	Brand (excluding retail)	Office B1	Residential C3	Brand A1	Retail Local A1 – A5	Food & Drink A3 – A5	Hotel C1	Leisure & Cultural D2	Community & Education D1	Infrastructure	Maximum Floorspace Permitted
1	145,000	29,000	24,085	29,000	1,854	8,600	16,000	1,078	1,900	700	213,000
2	0	0	53,000	0	1,446	1,200	0	0		1,400	56,000
3	45,000	40,000	0	9,000	1,200	3,500	0	16,000	0	200	102,000
4	32,000	110,000	68,000	6,500	2,700	2,000	0	822	0	0	130,000
5	0	0	115,000	0	2,800	2,100	0	0	0	0	118,000
6	0	0	39,915	0	0	3,000	0	1,900	5,000	1,500	51,000
7	0	0	0	0	0	0	0	0	0	0	0
Maximum Floorspace Permitted	222,000	179,000	300,000	44,500	10,000	20,400	16,000	19,800	6,900	3,800	670,000



Appendix 2: HPA Area Schedule

		MAX PERMITTED GEA (SQM)					SITEWIDE*
USE CLASS		DZ1	DZ2	DZ3	DZ4	DZ5	
Residential	Residential (C3)	46,514	259,200	255,100	199,500	44,300	730,330
Active Use Residential Led Plots at Ground Floor *Incl mezzanine	Retail: Retail (E(a))	1,500	5,000	1,000	250	250	6,000
	F&B: Food and Beverage (E(b)) / Drinking (sui generis) / Hot Food Take Away (sui generis)	1,000	3,000	7,000	500	500	10,000
	Service: Medical (E(e)), Creche / Day Nursery (E(f)) / Indoor Sport, Recreation and Fitness (E(d)) / Financial and Professional Services (E(c)) / Community (F2)	1,500	2,000	2,500	4,000	1,000	8,500
	Silverworks Incubator Space: Light Industrial (E(g)(iii)) / Office (E(g)(i))	0	0	0	2,500	2,500	5,000
Employment Led Plots Mills Quarter and Silverworks	Mills Quarter Flexible Workspace: Office (E(g)(i)) / Learning & Non-Residential Institutions (F1) / Research and Development (E(g)(ii))	71,705	0	0	0	0	71,705
	Silverworks Flexible Workspace: Light Industrial (E(g)(iii)) / Office (E(g)(i)) / Research and Development (E(g)(ii)) / Learning & Non-Residential Institutions (F1) / Storage and Distribution (B8) / Commercial Kitchen and delivery (Sui Generis)	0	0	0	0	45,000	45,000
	Ancillary Active Use: Retail (E(a)) / Food + Beverage (E(b)) / Drinking Establishment (Sui Generis) / Indoor Sport, Recreation or Fitness (E(d)) / Medical or Health Services (E(e)) / Community (F2) / Learning & Non-Residential Institutions (F1)	4,627	0	0	0	2,000	6,627
Mixed Flexible Cultural	Live music venue, Theatre (sui generis)	0	0	0	0	5,000	5,000
	Cinema (sui generis)	0	0	2,500	0	0	2,500
Other	Learning and Education (F1(a))	0	0	0	5,000	5,000	5,000
	Energy and utility infrastructure (sui generis)	0	1,000	1,000	500	1,500	4,000
	Hotel (C1)	0	0	7,000	0	0	7,000
TOTAL MAX AREA PERMITTED							885,000

- A minimum of 956sqm GEA Community (F2) floorspace will be delivered site wide.
- A minimum of 2,000sqm GEA Medical (E(e)) floorspace will be delivered site wide (to be controlled in S106 Agreement).
- A site wide maximum 80,705sqm GEA Office (E(g)(i)) will apply, of which:
 - a maximum of 5,000sqm GEA Office (E(g)(i)) to be delivered in Silverworks Flexible Workspace within Employment Led Plots.
- A site wide maximum 6,500sqm GEA Retail (E(a)) will apply, of which:
 - a minimum of 1,500 sqm GEA Convenience Retail (E(a)) to be delivered in DZ2; and
 - a maximum of 500sqm GEA Retail (E(a)) can be delivered within Ancillary Active Use within Employment Led Plots.
- A site wide maximum 14,000sqm GEA Food and Beverage / Drinking Establishments / Hot Food Take-away will apply, of which:
 - a maximum 2,000sqm GEA Drinking Establishments can be delivered site wide;
 - a maximum 500sqm GEA Hot Food Take-aways can be delivered site wide; and
 - a maximum of 4,000sqm GEA Food and Beverage / Drinking Establishments / Hot Food Take-away can be delivered within Ancillary Active Use within Employment Led Plots.