

EXAMINATION IN PUBLIC OF NEWHAM LOCAL PLAN

HEARING STATEMENT PREPARED BY DP9 LTD ON BEHALF OF GBZ V.O.F

27/11/2025

Matter 12 (Green and Water Spaces): GWS2 Question Q12.2

1. Introduction

- 1.1 This Hearing Statement has been prepared by DP9 Ltd on behalf of GBZ v.o.f, in response to Matter 12 ('Green and Water Spaces'), of the agenda issued by the Inspector on 9th October 2025.
- 1.2 GBZ v.o.f, is part of the Good Hospitality Group, and has been successfully operating the Good Hotel vessel in the Royal Victoria Dock since it was floated across the Channel and then moored in its current location in 2016. The Good Hotel has been especially successful in harnessing its business for the benefit of the Good Training Programme.
- 1.3 The Good Hotel is proud to have played a key role in helping to make the western end of the Royal Victoria Dock more accessible, welcoming, and enjoyable for both the local community and visitors. Eight years ago, the Corniche on which the existing hotel is moored was largely empty and exposed to winds, discouraging people from spending time there. Since the Good Hotel's arrival in London, the Corniche has been revitalised and transformed into a vibrant and lively destination. GBZ v.o.f have fostered a collaborative spirit with partners such as Royal Docks Management Authority (RoDMA), Excel, and Lendlease, all of whom share the same commitment to animating the Corniche and celebrating the waters of the Royal Victoria Dock, so as to help create a vibrant, economic active part of Newham.
- 1.4 This Hearing Statement is submitted further to our earlier representations made at Regulation 19 stages of the draft new Local Plan and seeks modifications necessary to ensure that the policies are robust, evidence-based, and consistent with both national and regional policy frameworks.

2. Inspector's Questions

- 2.1 In particular, this Hearing Statement seeks to address the following aspects of Q12.2 in the letter issued by the Inspector on 9th October 2025.



Question 12.2: Is policy GWS2 justified and consistent with national policy and the London Plan? In particular, the requirement in part 2 for development affecting and/or adjacent to water space to improve the existing water space network, including navigation, biodiversity (including riparian trees and wet woodland), water quality, visual amenity, character, and heritage value.

2.2 Policy GWS2 seeks to protect and enhance all existing water spaces in the borough which is broadly consistent with national policy and the London Plan – particularly policy SI 16 and SI 17. London Plan Policy SI 16 emphasizes the importance of preserving and enhancing the use of London’s waterways for various activities, including leisure, transport, and biodiversity. The policy encourages development that contributes to the activation and appreciation of these water bodies. Further, London Plan Policy SI 17 focusses on the protection and improvement of waterway environments, supporting biodiversity, and ensuring sustainable development practices.

2.3 Relevant passages of Policy SI 17 is criteria D which state:

“Development proposals into the waterways, including permanently moored vessels, should generally only be supported for water-related uses or to support enhancements of water-related uses.”

2.4 Criteria D provides for two separate types of development that are capable of being supported; firstly, water related uses and secondly, development to support enhancements of water related uses. Importantly, the use of the phrase *“generally only supported for...”* also makes clear that those two types of development are examples of the sorts of development that could be supported but are not the only development that can be supported. The word ‘only’ is however unnecessary as it could constrain innovation and further investment. However, the only sensible interpretation of the word *“generally”* is that there will be other types of development that on occasion can be supported, as a matter of planning judgment. This is not an exclusive list therefore.

2.5 This interpretation is reinforced by the supporting text at 9.17.2:

“9.17.2 Generally, permanently-moored vessels and development into waterways should only be permitted for water-related uses. However, ancillary uses, such as bars and restaurants (for example ancillary to a passenger pier), can support enhancements of water related uses, as well as improve access to or along waterways and related public realm. Ancillary uses can also add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks. The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. The waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.”

2.6 The supporting text makes it clear that whilst in general, permanently moored vessels should only be used for water-related uses or where they support water-related activities, that is not



to be read as a ban on such vessels for any other purpose. Indeed, it goes on to give the example of ancillary uses to a passenger pier as supporting “*enhancements of water related uses*”. The examples of ancillary uses given are bars and restaurants and again, these are simply examples rather than a definitive list of the type of development that could help support the water front, and is sensibly read as including floating vessels.

2.7 Furthermore, London Plan Policy SI 17 recognises these water spaces as environmental, social and economic assets. When SI 16 and SI 17 are read together, it becomes clear that the London Plan seeks to strike a careful balance between several objectives:

- Encouraging activation of the water and enhancing public access and enjoyment;
- Balancing these aims with other essential functions, such as navigation;
- Recognising the inherent qualities of water bodies—for instance, their distinction from land and their exceptional biodiversity value;
- While also emphasising the unique and varied character of different types of water bodies. A major river like the Thames differs fundamentally from a smaller river such as the Lea, from a canal, or from a pond, which in turn is very different from a large dock.

2.8 As currently drafted, draft Local Plan Policy GWS2 sets out some broad policies relating to green and blue infrastructure with policies applying across all water bodies in the Borough. In our view, this fails to properly recognise the unique characteristics and opportunity of the Royal Victoria Docks, and a more bespoke approach is warranted.

2.9 It is important to recognise that water activation in an urban setting rarely happens without some form of impetus or catalyst, usually commercial. It needs to be enabled and supported through forging strong partnerships combined with entrepreneurial spirit, and economic potential. Proposals for vessel’s in the waterways will deliver the essential infrastructure that supports and enhances these water-based activities—facilities that would otherwise be difficult to operate or maintain economically without the anchor of a vessel.

2.10 London Plan Policies SI 16 and SI 17 recognise that different bodies of water have their own characteristics, which need to be considered in the plan making process. Policy SI 17 part E is particularly relevant, which states:

“Development proposals along London’s canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctives and recognise these water spaces as environmental, social and economic assets.”

2.11 We believe the draft Local Plan Policy GWS2 should be amended to reflect this and better recognise the unique character of the Royal Docks and the different functions of each of London’s water bodies. In particular, we suggest the role of Royal Victoria Dock deserves a



bespoke policy to provide a much clearer and better targeted policy framework within which proposals can come forwards and be assessed, including floating vessels / structures for uses such as leisure, culture, residential moorings, visitor accommodation and food and beverage.

- 2.12 The Royal Docks hold significant untapped potential for placemaking and water activation, but their very large scale makes them difficult to enjoy and appreciate at a human level without tailored approaches. Unlike narrower waterways such as those in Amsterdam or Venice, the docks are often empty, windy, and inaccessible, having long since lost their original commercial purpose. While the eastern areas near City Airport are better suited to large-scale or innovative uses like floating solar farms, the western section around Royal Victoria Dock is already more accessible, closer to tourist attractions and is activated through efforts by key stakeholders. Historically, the docks thrived with trade and activity that gave them human scale, and the Local Plan should now foster and encourage imaginative, innovative uses that reconnect water and land—such as floating vessels or structures—rather than imposing restrictive policies. Successful activation requires flexibility, economic feasibility, and a positive planning framework that recognises the unique character and scale of the Royal Docks.
- 2.13 It is worth noting that an application for full planning permission has recently been submitted (ref. 25/02185/FUL) for the permanent mooring of the Good Community Vessel in the Royal Victoria Dock, which will provide 225 hotel rooms along with associated ancillary flexible food and beverage and community floorspace, along with associated boardwalks and bridges, landscaping and public realm, as well as a range of water activation amenities including a community lido, kayak/Stand Up Paddleboard (SUP) hire facilities, and a new club house for visitors and open water swimmers. Please find CGI of the proposed scheme at Appendix 1.
- 2.14 Overall, Policy GWS2 is broadly justified and consistent with national policy and the London Plan in seeking to protect and enhance water spaces. However, its current drafting is overly generic, and insufficiently positive to uses such as the Good Hotel. It does not sufficiently reflect the distinct scale and character of the Royal Victoria Docks. A more bespoke and positive approach—encouraging innovative, economically viable uses that activate the water and reconnect it with the urban environment—would ensure much closer alignment with London Plan policies SI 16 and SI 17, as well as being consistent with National Policy.

3. Conclusions

- 3.1 This Hearing Statement, prepared on behalf of GBZ v.o.f, demonstrates that while Policy GWS2 is broadly consistent with national policy and the London Plan, particularly SI 16 and SI 17, in its aim to protect and encourage use and enhancement of water spaces by improving navigation, biodiversity, water quality, visual amenity, character, and heritage value, main modifications are required to ensure its justified and in accordance with national and regional planning policy.
- 3.2 While SI 16 and SI 17 emphasise both activation and protection of waterways, they also recognise the need to account for the distinct characteristics of different water bodies and allow flexibility for ancillary and innovative uses that support water-related activity. As currently



drafted, GWS2 applies broad principles across all water spaces without discrimination of their respective roles – and in particular does not adequately reflect the unique scale and opportunities of the Royal Docks, where activation requires tailored approaches and commercial impetus to succeed. A bespoke policy framework for the Royal Victoria Dock would far better align with the London Plan by encouraging imaginative uses—such as floating vessels and cultural or leisure structures—that reconnect water and land, deliver economic viability, and reinvigorate the docks as environmental, social, and economic assets.

- 3.3 As drafted, GBZ v.o.f consider that draft Local Plan Policy GWS2 is not justified and would not be effective in helping to improve the functionality, connectivity, quality and accessibility of the existing water space, which as a whole would significantly enhance the Royal Docks.



Appendix 1

