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From: George Fairlie [REDACTED]
Sent: 07 July 2026 15:43
To: Local Plan
Cc: [REDACTED]
Subject: Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042
Attachments: London International Exhibition Centre Plc and Mount Anvil - Consultation Response to LBN Main Mods 07.07.2026.pdf

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Good afternoon,

On behalf of our clients London International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil, we are writing to set out our consultation response regarding the Proposed Main Modifications to the Newham Local Plan 2026 – 2042.

We submitted the response online via your Co-create consultation platform, but please find attached for our response letter.

Best,
George

George Fairlie

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CAG/GF/DP6403
7th July 2026

Planning Policy Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

Sent via email to: localplan@newham.gov.uk

Dear Sir/Madam,

**Newham Local Plan: Proposed Main Modifications for Consultation
London International Exhibition Centre Plc and designed in partnership with
Mount Anvil Consultation Response**

On behalf of our clients London International Exhibition Centre Plc (Excel) and designed in partnership with Mount Anvil, we are writing to set out our consultation response regarding the London Borough of Newham: proposed main modifications for consultation.

In particular these representations focus on Site Allocation N2.SA5 'Excel Western Entrance', the majority of which falls within the long leasehold ownership of London International Exhibition Centre Plc.

This letter is submitted further to our earlier representations made at the 'Call for Sites' stage and during the Regulation 18 and Regulation 19 stages of the draft new Local Plan. In addition, it follows the submission of the Hearing Statement and attendance at the Examination in Public (EiP) that took place on the 4th December 2025 and 4th February 2026.



Policies Map

We welcome the changes made to the Policies Map since Regulation 19 (left-hand side of Figure 1), which previously designated much of the Site Allocation as Green Space. While the proposed main modifications (right-hand side of Figure 1) are more consistent with the Regulation 18 Policies Map, we consider that the mapping should more closely reflect the adopted Local Plan Policies Map and the existing on-site situation (see Appendix 1).

Our understanding is that the purpose of the Policies Map is to identify *actual* existing green spaces. On that basis, we remain of the view that the updated Policies Map should be consistent with the adopted version by showing the three genuine green spaces, and excluding the hardstanding between the pleached trees and the mound. The hardstanding is not 'green', functions primarily as a pedestrian route, and does not serve a green-space role. An inaccurate designation may create uncertainty at application stage and undermine the effective delivery of the site allocation.



Figure 1: Regulation 19 Draft on the left and Proposed Main Modification on the right

N2.SA5 Excel Western Entrance

We welcome the modifications to the Site Allocation Map for N2.SA5 Excel Western Entrance, particularly the reduction in the 'opportunity for green space' (see Figure 2 below). Whilst we appreciate that the Site Allocation Map is illustrative and suggests 'opportunities' for green space, there is a risk that when interpreted literally the Map would have the effect of preventing and significantly constraining the development potential of the Site Allocation and the other land uses sought, rendering the allocation itself unviable and unable to deliver the actual objectives of the allocation.

We support the principle of the modified wording, particularly the emphasis on enhancing existing green space and recognising Royal Victoria Square as a consolidated and flexible small green space. We also welcome the additional wording seeking to retain the existing quantum of green space, improve its functionality, and explore opportunities to retain original design features of heritage value. However, as noted earlier, we do not consider the quantity of green space shown on the Policies Map



to be an accurate reflection of what currently exists or what can reasonably be regarded as green space.

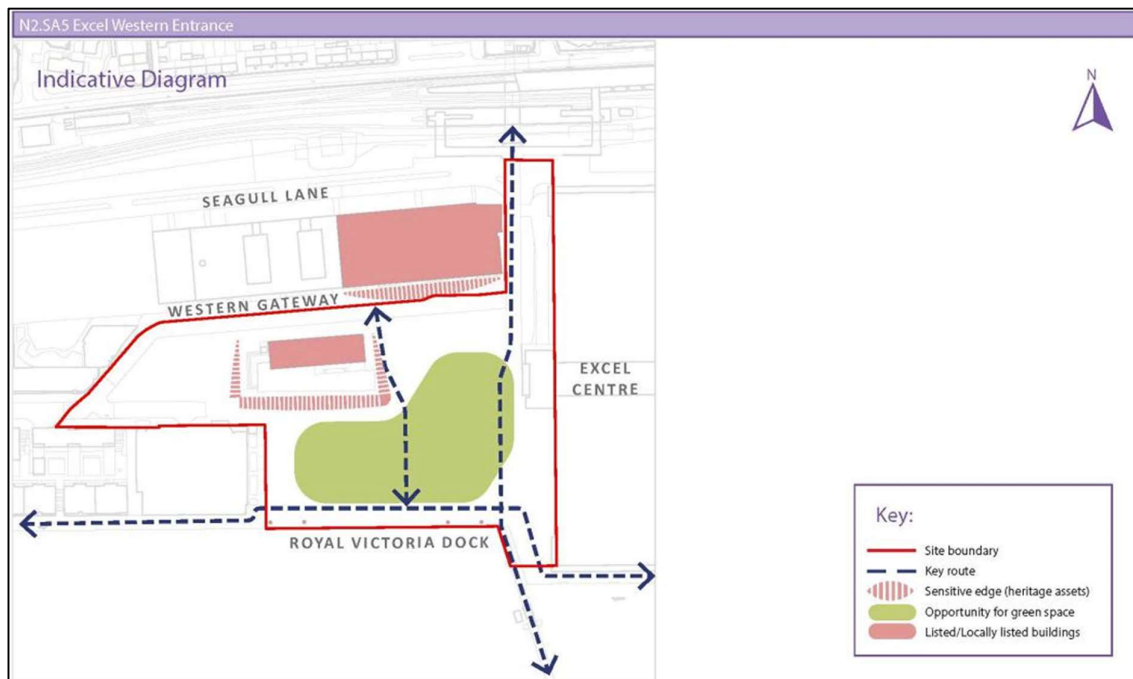


Figure 2: Main Modifications Site Allocation Plan

Building Heights

Table 1 (Tall Building Zones (N2.SA5 – Excel Western Entrance)) under draft Policy D4 Part 2 currently prescribes prevailing heights should generally be between 21m and 32m (ca. 7-10 storeys) with the opportunity to include a tall building element of approximately 40m (ca. 13 storeys) to the west of the site.

The general approach in the Site Allocation, of reinforcing the legibility of the existing street hierarchy and active frontages, locating lower massing towards the designated heritage assets and increasing height to the west of the Site, is sound. However, from a heritage and townscape perspective, there is potential for greater capacity within the Site boundary and additional height beyond that proposed in the Site Allocation. A taller building could result in a more elegant form and better integrate with the immediate and surrounding context, as the pre-application design studies undertaken by HTA suggest. In this location, the strategic transport accessibility of Custom House and the Elizabeth Line, combined with the gateway role of the site and its importance as a local connection point, strengthens the case for a building of greater height. This approach has the potential to ensure that the tallest building can successfully act as a wayfinder and gateway, optimise the use of the site, and contribute positively to the setting and significance of nearby heritage assets.

Prevailing building heights along Western Gateway have shoulder height buildings of between 7-13 storeys – not limited to 10 storeys - with taller buildings up to 22 storeys – significantly higher than 13



storeys. Based on an analysis of townscape, building hierarchy and heritage, it is considered that more appropriate building heights for the Site Allocation would be as follows:

- Prevailing heights should generally be between ~~21-32m (ca. 7-10 storeys)~~ **21-40m (ca. 13 storeys)**.
- Opportunity to include a tall building element **of approximately** up to ~~40m (ca. 13 storeys)~~ **60m (ca. 18 storeys)** to the west of the site.

For the reasons set out above, we believe the proposed modifications should be amended to:

- Update the draft Policies Map to accurately reflect existing green space;
- Ensure the Site Allocation Map does not overstate green space requirements; and
- Increase the building height parameters to appropriate levels for the site, to provide sufficient flexibility for the allocation to come forward effectively.

We trust that these comments are helpful and will be accommodated in the new Local Plan. We look forward to working collaboratively with the Council to unlock the potential of the site.

Yours faithfully



DP9 Ltd.



Appendix 1 (Existing Situation)

