

[REDACTED]

From: Harry Howat [REDACTED]
Sent: 07 July 2026 16:45
To: Local Plan
Cc: [REDACTED]
Subject: London Borough of Newham - Response to Proposed Main Modifications of Draft Local Plan
Attachments: LB Newham Draft Local Plan Main Modifications - Silvertown Homes Limited.pdf; 4. Parameter Plan 04 - maximum heights.pdf

Dear Sir/Madam,

I write on behalf of Silvertown Homes Ltd to submit written representations in response to LB Newham's Draft Local Plan Main Modifications in respect of their land holdings. We have also submitted though Co-Create and received acknowledgement from James (copied).

Please can you confirm receipt of this email / attachment.

Thanks,

Harry

Harry Howat

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CAG/RF/HJH/DP6445
07th July 2026

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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

DRAFT NEWHAM LOCAL PLAN REVIEW – RESPONSE TO PROPOSED MAIN MODIFICATIONS

REPRESENTATIONS ON BEHALF OF SILVERTOWN HOMES LTD

These representations are submitted in response to the London Borough of Newham (herein 'LBN' or 'the Council') consultation on Proposed Main Modifications to the Newham Local Plan ('Draft Local Plan').

These representations have been prepared on behalf of Silvertown Homes Ltd ('SHL') which holds the majority landownership interest in the land that comprises **Site Allocation N2.SA4 – Land at Thameside West and Carlsberg Tetley Dock** (herein 'the Thameside West Site Allocation').

These representations consider the 'soundness' of the Draft Local Plan with regard to Paragraph 36 of the NPPF (December 2024) which states that local plans are 'sound' if they are:

- a) **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant



Site Background

The Thameside West site (herein the 'Site') benefits from Hybrid Planning Permission ('HPP') reference 18/03557/OUT, which was approved on 5th October 2021. The HPP comprises a Detailed Component (Phase 1) and an Outline Component (all matters reserved for Phases 2-11) for the phased delivery of the remainder of the approved development. The full description of development is as follows:

"A hybrid planning application comprising:

- 1. Detailed planning application for Phase 1 with works to include the proposed demolition of existing buildings and structures, and the erection of buildings, including tall buildings, comprising 401 residential units (Use Class C3) including 195 affordable units (46% by habitable room); 3,608 sqm. (GEA) of flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted) and B8); 230 sqm. (GEA) of flexible retail floorspace (Use Classes A1-A4); a new/alterd access road from Dock Road/North Woolwich Road; new streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and servicing spaces; and other works incidental to the proposed development.*
- 2. Outline planning application (all matters reserved) for the phased delivery of the balance of the site for the proposed demolition of existing buildings and structures; the erection of buildings, including tall buildings, comprising a new local centre; a primary school (Use Class D1); residential units (Use Class C3); flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted) and B8); flexible employment floorspace (Use Classes B1c, B2 and B8); flexible retail floorspace (Use Classes A1-A4); community and leisure floorspace (Use Classes D1 and D2); the construction of a new flood defence wall and delivery of ecological habitat adjacent to the River Thames and associated infrastructure; streets, open spaces, landscaping and public realm (including new park and SINC improvements); car, motorcycle and bicycle parking spaces and servicing spaces; utilities including energy centre and electricity substations; and other works incidental to the proposed development."*

On 2nd August 2023, a NMA application ('NMA01') was approved (ref. 23/01717/NONMAT) by the London Borough of Newham ('LBN') to amend the wording of Condition 4 (Reserved Matters Time Limits for Submission of Details) attached to the HPP by removing the phrase 'and approved by'.

On 31st January 2024, a second NMA application ('NMA02') was approved (ref. 24/00224/NONMAT) to alter the wording of Conditions 6 (Approved Drawings and Documents) and 77 (Phasing Plan) attached to the HPP to approve a revised Phasing Plan.

NMA02 created a new Phase 0.1 ('Detailed Component Demolition and Above Ground Site Preparation Works') and Phase 0.2 ('Outline Component Demolition and Above Ground Site Preparation Works'). It also created 'Phase 2A' relating to the Leaway Park public realm and connectivity improvements to allow these works to come forward as the first phase of the Outline Component and the first application for reserved matters approval ('RMA').



On 10th June 2024, an application for a Certificate of Lawfulness (Existing Use or Development) ('CLEUD') was approved (ref. 24/01244/CLE) to confirm that the demolition of the Vision Centre annex to the Silver Building within Phase 1 had lawfully implemented the Detailed Component of the HPP, in line with Condition 3 (Time Limit – Detailed).

On 22nd January 2025, the first application for RMA (ref. 24/01507/REM, 'RMA01') was approved by LBN in relation to Phase 2A (Leaway Park). This granted approval for:

"The creation of a riverside walk and park comprising hard and soft landscaping, seating, ecological enhancements, play spaces and introduction of a pedestrian and cycle ramp connecting to the Lower Lea Crossing."

A further non-material amendment application to the HPP has been submitted 'NMA03' (ref. 26/00595/NONMAT) proposing an update to the Phasing Plan and Parameter Plans to reflect the as-built road layout following the completion of works relating to the Silvertown Tunnel. NMA03 is currently pending determination by LBN.

A non-material amendment application to RMA01 relating to Phase 2A (ref. 26/01240/NONMAT) has also been approved comprising design changes to facilitate the delivery of the approved staircase with Leaway Park as part of Phase 2A.

A collaborative pre-application process with LBN and GLA officers has also been progressed since April 2026 to discuss the detailed design of Phases 1 – 4 (Development Zones A to F and Dock Park) prior to submission of a non-material amendment to make changes to the detailed design of Development Zones A and B (the Detailed Component) in Phase 1 and an application for Reserved Matters Approval ('RMA') for Development Zones C to F and the Dock Park in Phases 2-4.

Previous representations were submitted to LBN in February 2023 in response to the Regulation 18 Draft Local Plan consultation ('the Regulation 18 Consultation') and September 2024 in response to the Regulation 18 Draft Local Plan consultation ('the Regulation 19 Consultation'). These representations raised concern that the Site Allocation N2.SA4 text for the Site didn't accurately reflect the true extent of the consented development under the HPP, particularly relating to maximum building heights under Site Allocation N2.SA4 and Policy D4 (Tall Buildings).

Main Modifications – Design Principles

Mian 116 included within the Schedule of Main Modifications (ED030) proposes the following wording (~~striketrough~~ denotes deleted text and **bold underline** denotes new or amended text):

"Building heights should **generally** range between 21-32m (ca. 7-10 storeys) with taller buildings **of approximately up to 50m (ca. 16 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) to aid wayfinding.** ~~along the River Thames edge and adjacent open spaces.~~ Buildings should set back from the ~~watercourse~~ **water spaces** to avoid **or minimise** overshadowing impact."



The proposed amendments to the design principles to allow for additional building height captured by the main modifications are welcomed in the context of delivering the consented development under the HPP and allowing the capacity of the Site to deliver the level of housing.

As part of the previous representations, it was suggested that the Site Allocation text was amended to permit buildings up to 98m across the Thameside West Site Allocation in accordance with the approved Parameter Plan 04: 'Development Zones Maximum Height Limit' (ref. A-SL-011-xx-04 Rev 04)¹, which is appended to this letter. The inclusion of maximum building heights of up to 100m (c.33 storeys) is therefore welcomed and will aid the delivery of development on the Site.

Main Modifications – Local Plan Policies Map

PM4 included within the proposed changes to the Local Plan policies map relates to the additional 60m and 100m tall building zones added to the Thameside West Site Allocation (N2.SA4). As noted above, while the updated allowance for additional building height to allow alignment with the HPP as approved is welcomed, the Policies Map is proposed to be updated by identifying the heights of individual consented buildings (see below). This level of detail is unnecessarily restrictive, is not justified to allow reasonable alternatives to be taken into account based on available evidence and does not align with the approach taken on other Site Allocations within the Draft Local Plan, where indicative height parameters are shown more broadly across the development area.

Proposed Main Modification [not to scale]



¹ NMA03 (ref. 2026/00595/NONMAT) to the HPP (currently pending determination) seeks to update Parameter Plan 04: 'Development Zones Maximum Height Limit' (ref. A-SL-011-xx-04 Rev 05).



The approach taken for the Thameside West Site Allocation effectively fixes a height to individual, consented buildings, which places unnecessary restriction on any future development under, or amendment of, the HPP. The proposed approach is overly prescriptive and does not allow for any future flexibility that would expect within a strategic site allocation.

In addition, the updated policies map does not accurately reflect the full extent of the consented planning permission under the HPP, which shown on the enclosed approved Parameter Plan. The map only references a small number of consented buildings approved under the HPP and omits a large proportion of the approved development.

The Local Plan policies map should provide a strategic guide for future development to be brought forward, not set out prescriptive development parameters for a particular planning permission. Owing to the nature of the HPP and the wider timescales for delivery, it is expected that the development will evolve over time, as is demonstrated by the non-material amendments approved to date and currently being discussed with LBN officers. It is important that the revised Local Plan allows for any future flexibility and doesn't over-prescript individual building heights.

To ensure that the Thameside West Site Allocation is reflective of the HPP and that Local Plan meets the 'positively prepared', 'justified' and 'effective' soundness tests, the policies map should be amended further so that:

- Building heights are expressed as broader zones across the Site allocation area, as opposed to the current, restrictive building heights; and
- The revised approach to building heights across the Thameside West Site Allocation reflects the full extent of the development approved under the HPP.

Conclusions and Next Steps

Whilst we welcome the inclusion of updated maximum building height parameters in Site Allocation N2.SA4 - Land at Thameside West and Carlsberg Tetley Dock to capture building heights under the approved HPP (ref. 18/03557/OUT) for the Thameside West site, further refinement of the Policies Map is required to ensure there is alignment with the HPP, the approach taken to other strategic site allocations and allow for flexibility as development across the site allocation comes forward. This is to allow the full extent of the HPP and optimisation of the site allocation, including significant housing delivery within LBN, to be delivered in a timely manner.

We trust that SHL's representations will be considered by LBN before the Local Plan is finalised and submitted for examination. Should you have any questions please contact Chris Gascoigne

 Richard Foot  or Harry Howat
 of this office.

Yours faithfully,

DP9 Ltd.

DP9 Ltd



Notes

Check all dimensions on site. Do not scale from this drawing. Report any discrepancies and omissions to Sidell Gibson. This Drawing is Copyright ©

LEGEND

The details within this area are not for approval but will be the subject of reserved matters and detailed discussion with the Silvertown Tunnel project team and TfL to ensure compatibility with the delivery of the Silvertown Tunnel under the 2018 DCO.

Key Plan

Royal Docks

River Lea

River Thames

LEGEND

Thameside West Planning Application Boundary

Detailed Application

Development Zone

Development Zone Reference

Open Space

Landscape Treatment Reference (Refer to A-SL-011-xx-08)

Spot Height

All heights shown are above entrance datum (AOD) unless otherwise noted.

20 m 0 20 40 m

1:250

1:1000

P01	P.01 - 073 Planning Application	Date 5	By	CHK
Rev	Description	Date	By	CHK
Subsidiarity	SO WORK IN PROGRESS			
Project	THAMESIDE WEST			
Client	Silvertown Homes LTD			
Title	Site Layout Masterplan - Parameter Plan 04 Development Zones Maximum Height Limit			
Drawing No.	TSW1-SG-00-XX-DR-A-00035	Revision	P01	
Scale	1 : 1000	Drawn	Author	
1 : 1000 @A0		Author	Checked	
Date	10/11/22	Checked	Checker	