



## **Statement of Common Ground**

**Between**

**London Borough of Newham**

**And**

**Historic England**

**Stage: Newham Submission Draft Local Plan (Reg. 19)**

**Date: 26 March 2025**

## 1. Executive Summary

- 1.1. A statement of common ground is a written record of the progress made by plan-making authorities during the process of planning for strategic cross-boundary matters. It documents the strategic matters where effective cooperation has led to cross-boundary challenges and opportunities being identified, whether there is agreement between bodies in how these should be addressed, and how the strategic matters have evolved throughout the plan-making process. It is also a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries.
- 1.2. This Statement of Common ground addresses key strategic matters between the two signatories, the London Borough of Newham and Historic England, as relevant to the preparation of the Newham Submission Draft Local Plan and its progression to public Examination.
- 1.3. Strategic matters overseen by other organisations will be addressed in other SoCGs, in order to streamline the process of reaching agreements with each party. Where key strategic issues overlap between different organisations that Newham have signed statements of common ground with (e.g. the delivery of housing targets), these interrelations are summarised in the [Duty to Cooperate Statement](#) (2024) and the Duty to Cooperate Addendum (2025).
- 1.4. The document is intended to be 'live', updated as circumstances change. Please see the Governance Arrangements section of the statement for more details.

## 2. Parties Involved

- 2.1. Newham Council, who is the Local Planning Authority for the London Borough of Newham, which is an inner London Borough in East London situated between three rivers: the Lea to the west, Thames to the south and Roding to the east. London Borough of Newham is bordered by several other London Boroughs, including Tower Hamlets, Hackney, Waltham Forest, Redbridge, and Barking and Dagenham. Across the River Thames lies the Royal Borough of Greenwich.

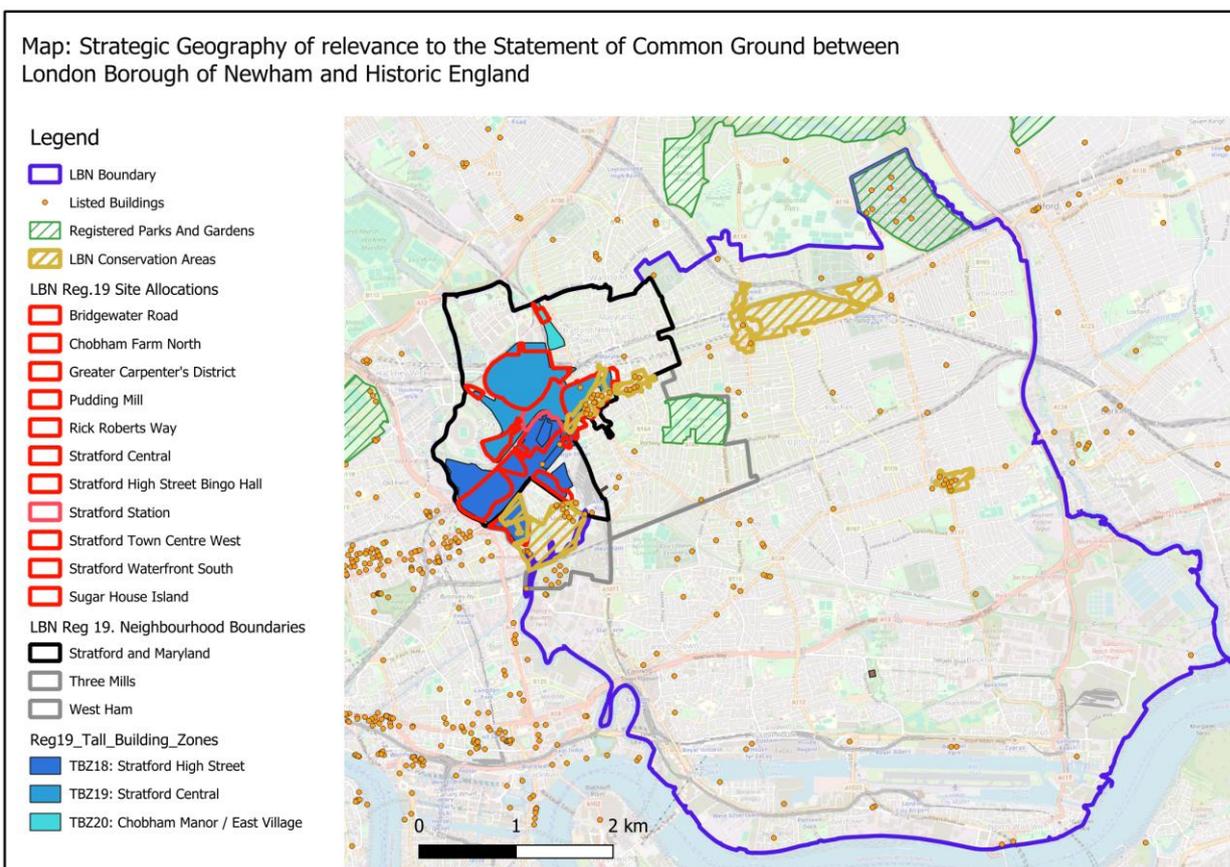
AND

- 2.2. Historic England (HE) is the Government's statutory adviser on the historic environment.
- 2.3. Newham is strategically located at the intersection of the London-Stansted-Cambridge-Peterborough Corridor, which is centred on enterprise and innovation within emerging sectors such as digital, media, life sciences, telecommunications and advanced manufacturing, and the Thames Estuary Creative and Cultural Industries Corridor, which adds to the borough's significance. It contains three Opportunity Areas: the Olympic Legacy (which also includes parts of the other Host Boroughs) Poplar Riverside (which crosses the boundary with Tower Hamlets) and Royal Docks and Beckton, which is also the home of London's only Enterprise Zone and Europe's largest regeneration area.
- 2.4. HE is a statutory consultee in the planning process. Its role in relation to emerging local plans is to ensure they appropriately reflect legislative and policy requirements in relation to heritage. In particular, it engages with local planning authority colleagues so that local plans offer a positive strategy for the management of the local historic environment.

### 3. Strategic geography

3.1. The map below identifies the spatial representation of the key strategic matters addressed, alongside the administrative area of the plan-making authority – London Borough of Newham.

3.2. Newham’s administrative boundaries also contain 65% of the London Legacy Development Corporation (LLDC) area, which acted as the planning authority for the Queen Elizabeth Olympic Park and surrounding area until the return of planning powers to the boroughs on 1<sup>st</sup> December 2024. As such, key strategic matters for the parts of the LLDC Mayoral Development Corporation that fall within Newham’s administrative boundaries are also addressed in the Newham Submission Draft Local Plan, and are subject to the matters addressed in this statement of common ground. Where relevant, the Newham draft Local Plan has retained and evolved site allocations and designations from the LLDC Local Plan (2020).



## 4. Background

- 4.1. Newham Council prepared the Submission Draft Local Plan and published it for consultation between 19<sup>th</sup> July and 20<sup>th</sup> September. This is the version of the plan that the Council considers to be 'legally compliant' and 'sound' and will be submitted to the Planning Inspectorate for examination in 2025. The council undertook two rounds of consultation prior to this, to inform the Newham Submission Draft Local Plan. These were:
- Issues and Options Consultation, which took place between 18 October and 17 December 2021; and
  - Draft Local Plan Consultation (Regulation 18), which took place between the 9 January and 20 February 2023.
- 4.2. A [Duty to Cooperate Statement](#) (DtC Statement) was published as part of Newham's Reg. 19 consultation, which provides a summary of London Borough of Newham's engagement with Transport for London, as a duty to cooperate partner, as part of the preparation of the new Newham Local Plan. The key strategic matter identified as part of this process is the potential for the Local Plan Tall buildings strategy to negatively impact on protected heritage assets, particularly in the Stratford and Maryland and the Three Mills neighbourhoods. The corresponding paragraphs in the Duty to Cooperate Statement are 4.249 to 4.257.
- 4.3. The national and regional policy context forming the background to this statement of common ground is also detailed in the Duty to Cooperate Statement (2024), under 'Chapter 2: Legislative and national policy context' and 'Chapter 3: Demonstrating compliance with the duty to cooperate'.
- 4.4. During the Reg. 19 consultation process, Historic England submitted comments to Newham that:
- Supported the amendments made from the Reg 18 version of the plan to policies D4, D7 and D9 and to relevant site allocations;
  - Retained concerns regarding the potential for the Local Plan Tall buildings strategy and individual site allocation design principles to insufficiently mitigate against the potential for new development to create harm to the significance of important designated heritage assets, particularly in the Stratford and Maryland and the Three Mills neighbourhoods;
- 4.5. Following review of the above matters, London Borough of Newham approached Historic England to begin discussions towards the signing of this Statement of Common Ground, which have progressed through email communication.

## 5. Key Strategic Matters

### 5.1. Tall buildings strategy and heritage protection

- 5.2. London Plan (2021) Policy D9 requires boroughs to identify location where tall buildings may be an appropriate form of development in order to optimise the use of land and meet housing need. Policy D9 part A, in particular, requires boroughs to identify in their development plan

what is considered a tall building for their specific localities and Policy D9 part B requires boroughs to define the maximum height that could be acceptable in these locations.

- 5.3. Policy D9 part C sets out a comprehensive list of criteria for tall buildings to meet – visual, functional, environmental and cumulative impacts to make sure that tall buildings play a positive role in shaping the character of an area.
- 5.4. Newham has considered the potential harm to heritage assets as one of the key criteria for assessing the suitability for sites being allocated in the Submission Draft Local Plan, as described in the Site Allocation Methodology Note (Site Allocation and Housing Trajectory Methodology Note) (2024). The wording of policies D4 (Tall Building Zones), D7 (Conservation Areas and Areas of Townscape Value), D9 (Designated and non-designated heritage assets, ancient monuments and historic parks and gardens) and N8 Stratford and Maryland (including site allocation design principles) have been further revised in the draft Proposed Submission Local Plan to better reference heritage considerations in the context of transformative growth, in response to concerns raised by Historic England at Regulation 18 stage.
- 5.5. While supportive of the changes made, Historic England retain their concern about the potential lack of understanding of the impact of the tall buildings strategy, including as set through individual site allocations’ design principles, on the significance of known heritage assets and historic character in the Stratford and Maryland area (which contains possibly the greatest concentration of designated heritage in the borough), and how this should inform design parameters as per the HEAN 3. Historic England would have preferred a review of the Stratford Conservation Areas’ Appraisal and Management Plans or a separate Heritage Impact Assessment to be undertaken, with consequent understanding of potential effects (including cumulative) to then inform the tall buildings strategy and site allocation policies for this part of the borough in an iterative process. However, Newham indicated that resources wouldn’t allow for this assessment to progress before the Local Plan adoption. Instead, Newham have updated the Characterisation Study (2022) with the finding of the built environment assessment of each neighbourhood that was undertaken as evidence base but had not been published in its entirety. The evidence was published at Reg. 19 as the Tall Building Annex (2024) to the Characterisation Study (2024).
- 5.6. Record of agreements and/or disagreements:
  - London Borough of Newham agree to undertake a review of the St John’s Conservation Area Appraisal and Management Plan as soon as resources will be available following adoption of the Local Plan, and to engage Historic England in the development of this document.
  - London Borough of Newham and Historic England agree that Policy D4 parts 3 and 4 (together with the further guidance in Table 1), and policies D7, D8 and D9 of the Submission Draft Local Plan, collectively provide the framework to address the potential impact of tall building proposals on the historic built environment in Newham, as and when proposals come forward.
  - Historic England continues to consider that there remains a gap in the evidence base relating to policy D4 and related site allocations and their likely cumulative effects on heritage significance and historic character in Stratford town centre. The approach set out does not take the opportunity to understand these effects and use this to ensure that the guidance in Table 1 and individual site allocation policies collectively

constitute an effective strategy to avoid and/or mitigate effects on the historic environment.

- Historic England agree that the Tall Building Zones they retain concerns regarding the height parameters expressed in the Policy D4.2 Table 1 are - TBZ18: Stratford High Street, TBZ19: Stratford Central, and TBZ20: Chobham Manor/East Village.
- London Borough of Newham and Historic England agree to continue to engage via development management process to ensure the protection of the historic environment of the borough.

## 6. Governance agreements

6.1. This statement of common ground will be reviewed:

- 6.1..1. Whenever agreement is reached on any outstanding matters. Or
- 6.1..2. At key milestones in progress towards addressing strategic matters. Or
- 6.1..3. At each subsequent key stage of the plan making process, as it progresses towards

## 7. Signatories

7.1. We confirm that the information in this statement and referred to documents reflects the joint working to date undertaken between London Borough of Newham and Historic England towards addressing the identified strategic matters.

<p><b>Signed on behalf of London Borough of Newham:</b></p>  <p><b>Name:</b> Ellie Kuper Thomas</p> <p><b>Date:</b> 21<sup>st</sup> March 2025</p> <p><b>Position:</b> Policy Manager, Planning and Development Directorate</p>	<p><b>Signed on behalf of Historic England:</b></p>  <p><b>Name:</b> Tim Brennan</p> <p><b>Date:</b> 26th March 2025</p> <p><b>Position:</b> Historic Environment Planning Adviser, London &amp; South East Region, Historic England</p>
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