

## Sara Chiong

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**From:** George Fairlie <[REDACTED]>  
**Sent:** 20 September 2024 13:13  
**To:** Local Plan  
**Cc:** Chris Gascoigne  
**Subject:** LBN Regulation 19 Representations  
**Attachments:** ExCeL Western Entrance. Reg 19 Local Plan Consultation Response.pdf; Appendix 1.pdf; Appendix 2.pdf; Appendix 3.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon,

On behalf of our clients London International Exhibition Centre Plc (ExCeL) and Mount Anvil, we are writing to set out our consultation response regarding the London Borough of Newham Draft Submission Local Plan (Regulation 19).

Please find attached for our consultation response letter, as well as the below supporting appendices.

- Appendix 1: Pre-application document April 2024
- Appendix 2: HTA Site Allocation N2.SA5 'Excel Western Entrance' map annotated with proposed open space
- Appendix 3 : Townscape and Heritage Assessment, prepared by TTC

Best,  
George

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Senior Planner

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Dear Sir or Madam,

**Draft Submission Local Plan (Regulation 19)**  
**London International Exhibition Centre Plc and Mount Anvil Consultation Response**

On behalf of our clients London International Exhibition Centre Plc (ExCeL) and Mount Anvil, we are writing to set out our consultation response regarding the London Borough of Newham Draft Submission Local Plan (Regulation 19).

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. In addition, as freeholder for the site, the GLA (through the Royal Docks team) have been involved in the vision and feasibility work and are supportive of our emerging proposals, including the reconfiguration of open space at Royal Victoria Square, and the comments in these representations.

This letter follows our previous representations at 'Call for Sites' stage in December 2021 and more recently our letter dated 30<sup>th</sup> May 2024 referring to the Reg 18 Local Plan and subsequent pre-application discussions regarding the development potential of the Site.

In addition, this letter proposes to remove ExCeL's ownership from the boundary of Site Allocation N3.SA1 'Royal Albert Dock' and also endorses the GLA's separate representations regarding Policy GWS2 'Water Spaces'.



## **Background - ExCeL's Commitment to Newham**

The proposed redevelopment of the Western Entrance of ExCeL is a pivotal moment in the ExCeL's aspirations to be the No.1 conference and convention centre in Europe and to be at the forefront of the global events industry.

The imminent opening of the 250,000 sq.ft. Phase Three development and the launch of the 160,000 sq.ft Immerse LDN dockside experience, at a cost of £300m, highlights the continued appetite of ExCeL's owners to invest in the Royal Docks and remain a long time partner of the London Borough of Newham.

ExCeL are also extremely supportive of Newham's need for new housing, showcased by the Joint Venture with Mount Anvil at Royal Eden Dock, where the construction of 854 new homes (including 40% affordable housing) is now scheduled for completion in 2027.

We are delighted that the Western Entrance has been acknowledged as a Strategic Site in the Reg 19 draft Local Plan. However, whilst new housing has been identified as a suitable future use, this allocation to also needs to acknowledge our requirement for a new events building and visitor accommodation, within the allocation.

Without these additional facilities, internationally significant events would potentially be lost to other national and international venues.

The Phase Three development and Immerse LDN are projected to increase visitors numbers by 2.5 million once fully operational, as well as generating hundreds of new jobs. MSOA data suggests that 41% of operational employment in will come from the London Borough of Newham and overall 88% (inc LBN) will go to residents of London.

Based on previous research, each visitor spends between £97 and £530 each day when visiting an event. However, the majority of this spend occurs outside the venue. ExCeL's ability to offer additional visitor accommodation and entertainment opportunities will contribute directly to the objective to retain visitor spend within the Royal Docks locality to further support the Newham economy, in addition to the delivery of new homes and enhanced public realm.

The Local Plan Site Allocation has the ability to fully unlock the potential of the Western entrance site and delivery wide ranging public benefits. However, it is important for LBN to understand that the seriously prejudicial wording of the proposed Site Allocation significantly constrains the development potential of the Site to the extent that the intent of the allocation is undeliverable, meaning our clients have halted all pre-application work on the scheme.

We have set out below our comments on the Draft Submission Local Plan (Regulation 19) accordingly.



## **1. Principle of Site Allocation**

We fully support the principle of the site being given Site Allocation status in the new Local Plan.

As set out in the pre-application document dated April 2024 (Appendix 1), the site is at the heart of the regeneration of the Royal Docks and is in a highly accessible location. With the Elizabeth Line and future Silvertown Footbridge, it forms an important node between the Custom House and Silvertown communities. The site also frames ExCeL London's front entrance and visitor experience.

Reimagining the site with a high quality and considered proposal will promote its function as a nodal point connecting neighbouring development and multiplying their success, as well as delivering a number of clear benefits that align directly with the objectives of the new Local Plan, including the following:

- Enhancing the existing central arrival point to the Royal Docks that has been unlocked by the Elizabeth Line, creating an environment befitting this important role and furthering its reputation as a world class cultural destination
- Beautifully bold and bespoke public realm which is reconfigured and enhanced, focused on a varied & engaging programme of spaces for the existing community, new communities and visitors, celebrating nature and biodiversity.
- Improving connectivity between existing and new communities at Custom House & Silvertown, promoting broader community cohesion and equality.
- Local opportunity for growth, providing new jobs and training in the heart of Newham, with the potential for continuity of employment and skills impacts linked to the ongoing Royal Eden Docks development.
- Improved connectivity with the water to connect users with Royal Victoria Dock, the newly transformed ExCeL London waterfront and surrounding developments
- A range of land uses providing activated public spaces throughout the whole day with diverse land uses. Incorporating residential, apart/hotel, entertainment and F&B
- Up to c.375 new high quality and energy efficient homes on a major LBN public transport node, including the provision of much-needed low cost affordable housing.
- Entertainment and apart/hotel accommodation aligned with the visitor designation objectives for the Royal Docks and supporting ExCeL's strategic role as London's largest exhibition venue.

Please refer to the pre-application document in Appendix 1 for further details of the vision and initial proposals.

## **2. Site Allocation: Development Principles – Land Uses**

The Site has the unique potential to build on the long term success of ExCeL and to further embed the Royal Docks as a visitor destination. It is the right location for ExCeL's role, function and visitor offer to expand, to ensure continued investment and the ability to attract the best global events and exhibitors. The proposed events building will supplement ExCeL's existing offer by providing a unique venue for potential immersive experiences and cutting edge exhibitions, for which there is considerable market demand. Likewise, the proposed visitor accommodation allow visitors to the





venue to stay locally, spending more time in the Royal Docks resulting in increased local expenditure. These uses are fundamental to maintaining ExCeL's position as a world leading venue. In turn, these proposed land uses would result in wide ranging planning and public benefits. Likewise, the residential proposals would build on the quality and success of Royal Eden Docks and help the Borough meet its housing delivery numbers.

From a design perspective, as demonstrated in the pre-application material, these land uses can be delivered alongside a consolidated, reconfigured and improved open space. One that is activated and reflective of its function defining the entrance to the ExCeL London venue.

Taking the above into account, we consider that the Site Allocation 'Development Principles' wording should better reflect the scale of the opportunity, emphasising how the allocation can contribute directly towards the wider Local Plan policy and vision objectives regarding housing delivery, employment, public realm, the Royal Docks as a visitor and cultural destination, and the importance of ExCeL's strategically important role in achieving this as a major cultural anchor in the Borough.

As a minimum, we consider that the 'Development Principles' wording should be amended to reflect the broader range of land uses that can be achieved as part of the Site Allocation, specifically referring to visitor accommodation, cultural/exhibition and food and beverage uses, in addition to residential, as follows (blue = our suggested wording):

*Residential development, [visitor accommodation](#), [cultural/exhibition](#), [food and beverage](#), community facility and open space.*

### **3. Site Allocation: Development Principles / Infrastructure Requirements – Open space**

The previous Call for Sites submission (Dec 2021) and the Pre-application document (April 2024) explained 1) the shortcomings of the existing public realm, which is generally underutilised and lacking in legibility and activation; and 2) the opportunities for providing new improved public realm with greater functionality.

Expanding on the above, the existing open space has many shortcomings, including:

- A lack of activation;
- No clear function or programme of uses;
- Poorly defined and illegible routes;
- Limited biodiversity;
- A poor use of space considering its size and location;

Ultimately the existing space is underutilised and offers little in the way of usable defined amenity for local residents, visitors or the wider community.

Whilst we appreciate the space was award winning when originally conceived, the locality has undergone significant change in the last 20 years, meaning the space is now not fit for purpose. There is the opportunity for the redevelopment of the wider site to achieve a much improved and



contextually relevant approach to public realm and place making, facilitated by the other land uses proposed. Ultimately the approach to public realm needs to be reflective of ExCeL's function as a major visitor destination and the site location as a key nodal point at the heart of the Royal Docks.

Accordingly, we recognise and support the principle of providing enhanced and reconfigured public realm as part of the Site Allocation. However, as drafted the Site Allocation wording is inconsistent and therefore the desired objectives of the public realm design are unclear. The Development Principles state "*Development should **retain** and enhance the existing open space along the waterfront edge. Royal Victoria Square to be **reconfigured** at the east of the site creating an inviting entrance to the Excel conference centre site*", whilst the Infrastructure Requirements states "*Development should **protect** existing open space and address open space deficiency by **reproviding** and enhancing Royal Victoria Square Civic Space as a **consolidated** open space*". Given the contradictions between 'retain', 'protect', 'reprovide', 'reconfigure' and 'consolidate', the wording as drafted is unclear, with competing objectives which creates uncertainty regarding the development potential of the site and its ability to deliver the broader aspirations of the site allocation. To provide clarity, we suggest the wording should focus on the key objective to reconfigure, consolidate and enhance the open space.

Significant design feasibility work has been undertaken over the last two years, as reflected in the pre-application proposals, which indicates that a reconfigured and consolidated open space located towards at the heart of the masterplan, flanked by the proposed new exhibition and residential uses, will maximise the function and design benefits of the space in terms of legibility, activation and connectivity.

In addition, we question the compatibility of the various competing functions stated for the open space, which currently include prioritising community growing, as well as publicly accessible play space in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play. We note that the play space is also stated to be '*in addition to the open space provision*'. These stated functions appear to be used generically across the Reg 19 Local Plan when describing the objectives for open spaces. This creates uncertainty regarding the overall quantum of open space that is sought and consequently uncertainty regarding the extent of potentially developable space and the principle of the other land uses sought.

Whilst we support the principle of the reconfigured open space accommodating an element of playable public realm, given the unique nature of the site at the entrance to ExCeL London and the gateway to the Royal Docks from the Elizabeth Line at Custom House, we do not think it is appropriate in place making terms for the open space to be dominated by play space and community growing. We suggest that the role and function of this open space is better focussed on the public realm that responds to movement, legibility, places to sit and dwell, for informal food and beverage, biodiversity and landscaping, in addition to informal place. We are concerned that large formal play space would compromise these prioritise and is not appropriate in this context at the entrance to the ExCeL venue.

Taking the above comments into account, we suggest the following amended wording to the 'Development Principles' and 'Infrastructure Requirements' sections of the Site Allocation:



#### *Development Principles*

*Development should retain and enhance the existing open space along the waterfront edge. Royal Victoria Square to be reconfigured at the east heart of the site creating an inviting entrance to the Excel conference centre site.*

#### *Infrastructure Requirements*

*Development should ~~protect existing open space and~~ address open space deficiency by ~~reproviding~~ reconfiguring and enhancing Royal Victoria Square Civic Space as a consolidated open space to the east of the site. The open space provision should prioritise community growing opportunities.*

*In addition to the The open space provision, development should include publicly accessible play space in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play, which should be playable public realm. Play space should meet the requirements of Local Plan Policy GWS5.*

#### **4. Site Allocation Map – Opportunity for Green Space**

Taking the above into account, we are very concerned that the graphic representation of the 'Opportunity for Green Space' on the Site Allocation Map (page 394) is too extensive and is inconsistent with the wording of the draft Site Allocation which currently states "Royal Victoria Square to be reconfigured at the east of the site"... "as a consolidated open space". 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.

The terminology 'Opportunity for Green Space' is also inconsistent with the primary objectives for the reconfiguration, consolidation and enhancement of the space proposed in the Site Allocation,.

We also note that the extent of the 'Opportunity for Green Space' is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren't then identified for any protection/allocation on the Reg 18 Local Plan Policies Map.

We consequently propose that the Site Allocation Map is redrawn based on the alternative version prepared by HTA Architects in Appendix 2, which proposes to graphically represent an opportunity for green space that aligns with the intent of the actual Site Allocation wording to locate a reconfigured and consolidated green space and reflects the design rationale underpinning the pre-application proposals. This approach would also be more consistent with that taken on other site allocations, where the scale and location of 'Opportunities for Green Space' appear to be better defined.



## Reg 19 Policies Map – Green Space

The Reg 19 Policies Map also seeks to designate the majority of the Site Allocation as Green Space. As with the Site Allocation map, the extent of Green Space on the Policies Map is considerably larger than the existing three green spaces identified on the adopted Local Plan Policies Map (2018), which weren't then identified for any protection/allocation on the Reg 18 Local Plan Policies Map. Given the Site Allocation proposes the reconfiguration and consolidation of the open space, we do not think it is then appropriate for the Policies Map to then designate and protect the entirety of the existing open space as 'Green Space'. This creates a direct conflict with the intent of the Site Allocation, prejudicing the ability to bring the site forwards for development at all.

As such, we recommend that the Policies Map is updated to remove the Green Space allocation from the Site in its entirety, consistent with the approach at Reg 18 stage, as the Site Allocation map better serves the purpose of identifying the potential location for the reconfigured and consolidated open space (subject to the amendments we have recommended above).

## 5. Building Heights

The draft Site Allocation currently prescribes building heights ranging between 21-32m (ca. 7-10 storeys) with a taller building up to 40m (ca. 13 storeys) to the west.

Please refer to the enclosed Townscape and Heritage Assessment prepared by The Townscape Consultancy in Appendix 3.

In summary, TTC's assessment is that 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. This approach has the potential to ensure that the tallest building can successfully act as a way finder and gateway, optimise the use of the site, and contribute positively to the setting and significance of nearby heritage assets.

The assessment identifies that 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:

*Building heights should range between ~~21-32m (ca. 7-10 storeys)~~ 21-40m (ca. 13 storeys) with a taller buildings up to 40m (ca. 13 storeys) 60m (ca. 19 storeys) towards the western part of the site. Massing should generally step down towards the east of the site to sensitively integrate with the prevailing height of the context and with the heritage assets.*



## 6. Other Draft Policies

Whilst we fully appreciate the extent of LBN's housing challenges and support the aspiration to address this, we have a number of concerns regarding the approach to affordable housing and dwelling mix in the Draft Local Plan, as follows.

Draft Policy H3 sets out the Council's approach to securing affordable housing delivery. Whereas the Regulation 18 draft Local Plan Policy was aligned to the London Plan requirements for affordable housing delivery, the Regulation 19 draft Local Plan introduces a requirement for 60% affordable housing by unit, comprised of 50% low cost rent and 10% shared ownership. Although it is acknowledged that the ability to meet the requirement can be viability tested, it is considered that this move away from the London Plan is detached from the reality of housing delivery in the current environment, where planning applications, scheme implementation and housing completions in London have reduced dramatically on account of viability, attributable to a range of factors. Whilst we appreciate the need for low cost rent in LBN and the reasons for prioritising it, the viability implications of doing so will need to be reflected in the overall percentage of affordable housing sought.

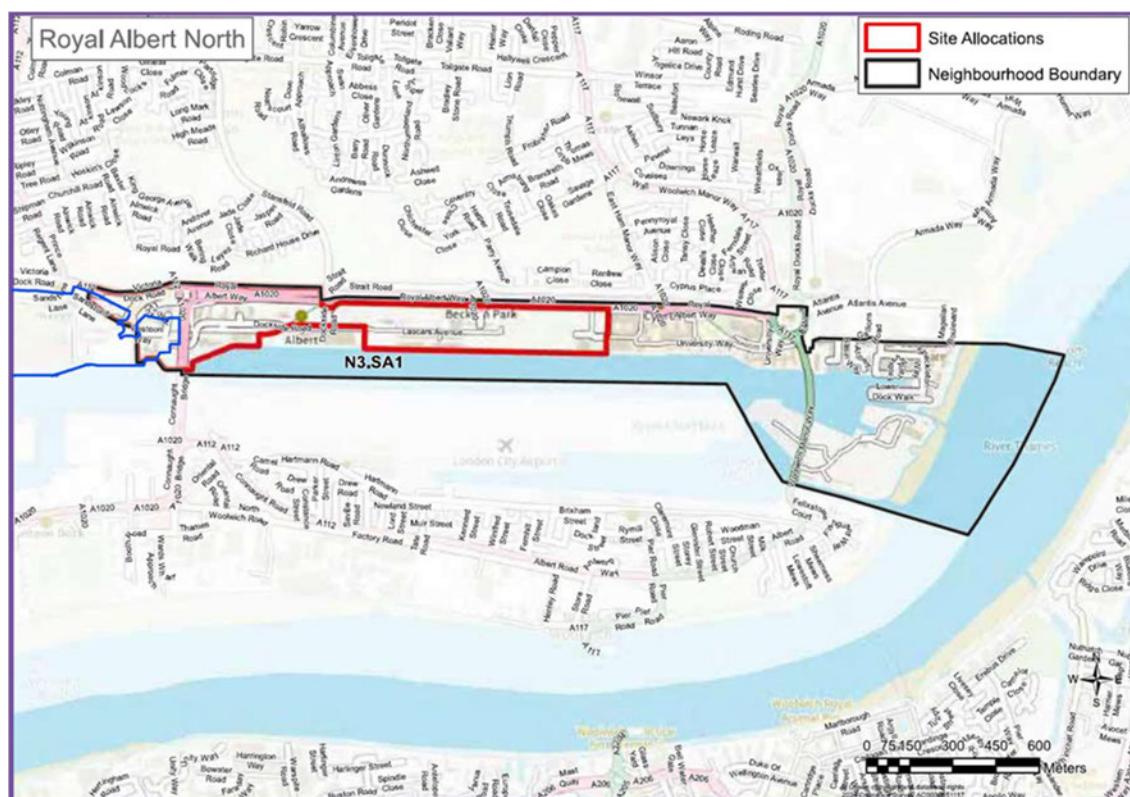
The discrepancy between the use of habitable rooms as a measure in the London Plan and units in the Regulation 19 draft Local Plan repeats an unhelpful misalignment that exists between current policies, undoing the alignment sought in the Regulation 18 draft Local Plan. The BNPP Study which supports the draft plan indicates that this change would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Using unit numbers as a metric also discourages developers from bringing forwards much needed family homes in the affordable tenures, which they current get 'credit' for through the use of the habitable room metric. Further, the Officer report to Newham's Cabinet Meeting held on 4<sup>th</sup> June stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan's viability. Officers were concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound. We echo these concerns and request that the wording of this policy is reverted to that in the Regulation 18 draft Local Plan, to be in general conformity with the London Plan.

In terms of housing mix (draft Policy H4), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percent (39% to 40%), it must also be recognised that the currently 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. To compound this, the proposed requirement for a minimum of 5% of 4+ bedroom units on site allocations further challenges the deliverability of family housing. The market demand and deliverability of this approach needs to be considered. We recommend that LBN should consider defining dwelling mix targets for different tenures, with the higher family housing targets being applicable to the low cost rented homes for which there is greater demand.



## Site Allocation N3.SA1 'Royal Albert Dock'

We request that the Site Allocation boundary relating to N3.SA1 'Royal Albert Dock' is amended to exclude the land within the ownership of London International Exhibition Centre Plc, comprising the Phase 3 extension to the ExCeL London venue and the DoubleTree Hilton and surrounds. The Phase 3 extension is now close to completion and will open shortly in early 2025. The DoubleTree Hilton is being retained and potentially extended to meet the significant demand for visitor accommodation. As such, neither of these sites should be included within the Site Allocation because they are not intended to come forwards for comprehensive redevelopment. Please see the plan below, identifying the extent of London International Exhibition Centre Plc's ownership in blue, overlayed on the Site Allocation. Accordingly, the Site Allocation red line boundary should be amended to reflect the blue ownership line. This approach has been agreed with GLA Land and Property.



## Policy GSW2 - Water Spaces

As a key stakeholder in Royal Victoria Dock ExCeL fully recognise the special characteristics of the dock and the important contribution of the water to the strength of the wider Royal Docks visitor destination offer. Accordingly, ExCeL fully support the GLA's representations proposing a bespoke policy to promote the unique role of Royal Victoria Dock and the opportunity for water-related activation and uses, to provide a much clearer policy framework within which proposals can come forwards and be assessed.



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

Yours sincerely,



**DP9 Ltd**

### **Appendices**

Appendix 1: Pre-application document April 2024

Appendix 2: HTA Site Allocation N2.SA5 'Excel Western Entrance' map annotated with proposed open space

Appendix 3 : Townscape and Heritage Assessment, prepared by TTC



EXCeL  
LONDON

MOU  
NTA  
NVIL

dp9

hta

# Royal Docks Gateway, ExCeL London

PRE-APPLICATION 01  
LONDON BOROUGH OF NEWHAM

Presented by  
HTA Design

April  
2024





# Vision



ExCeL London has been exploring the opportunity to re-imagine the Royal Docks Gateway at Custom House. The Royal Docks Gateway is in a highly accessible location. With the Elizabeth Line and future Silvertown Footbridge, it forms an important node between the Custom House and Silvertown communities.

There is an opportunity to reinvigorate this key piece of public realm for the community with improved legibility, enhanced biodiversity and a clear programme of use to promote an active public realm.

This public realm enhancement will be funded by an enabling development which delivers:

- 325-375 new homes including affordable, delivered in a joint venture with Mount Anvil
- C. 8,000m<sup>2</sup> of new entertainment space
- Apart/hotel and F&B space to support visitors to ExCeL London and promote use and activation of the public realm outside of typical event hours
- Employment and training opportunities for local people
- Borough CIL for wider infrastructure enhancements in Newham.

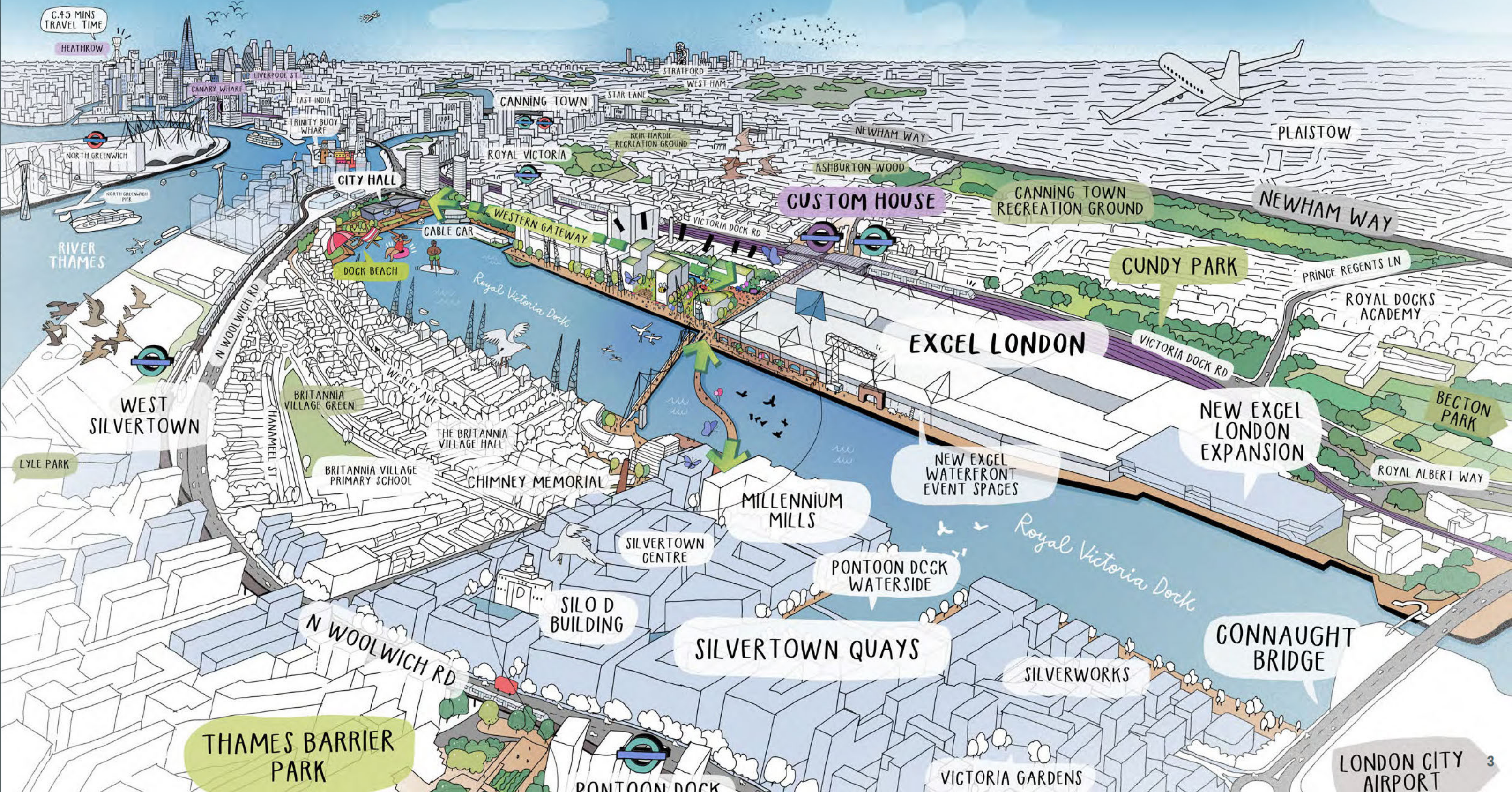
ExCeL London has appointed HTA, one of London's leading integrated building and landscape design practices to ensure that:

- There is no net loss of green space
- The re-provided public realm is significantly better quality than existing in that it is more usable and biodiverse
- The building and public realm design are considered as one to ensure an integrated and successful outcome
- As freeholder for the site, the GLA (through the Royal Docks team) have been involved in the vision and feasibility work and are supportive of the proposals.



# A New Gateway to the Royal Docks

## The Vision





# A New Gateway to the Royal Docks

## Key Benefits



**New central arrival point** to the Royal Docks unlocked by the Elizabeth Line. Creating a world class cultural destination



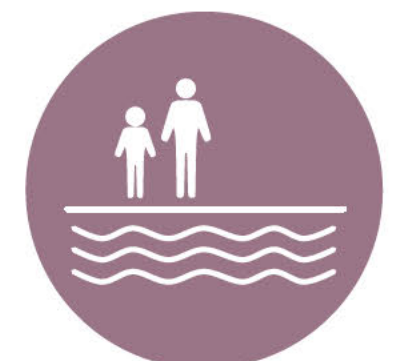
**Beautifully bold and bespoke enhanced public realm** focused on a varied & engaging programme of spaces for culture, tourism, visitors & the existing community



**Improving connectivity** from Custom House & Silvertown, north-south.



**Local opportunity** for growth, providing new jobs and training in the heart of Newham. Connecting to the existing Custom House Community



**Improved connectivity with the water** to connect users with Royal Victoria Dock, the new ExCeL London waterfront and surrounding developments



**A range of land uses** providing activated public spaces with diverse commercial uses. Incorporating residential, apart/hotel, entertainment and F&B



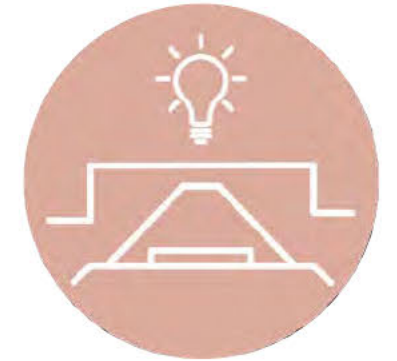
**325-375 new homes** on a major LBN public transport node. With the provision of affordable housing



**Entertainment and apart/hotel accommodation** aligned with the visitor designation objectives for the Royal Docks and supporting ExCeL London's strategic role as London's largest exhibition venue



**Heart for movement**, a gateway between Custom House & Royal Victoria Dock and to the wider emerging communities



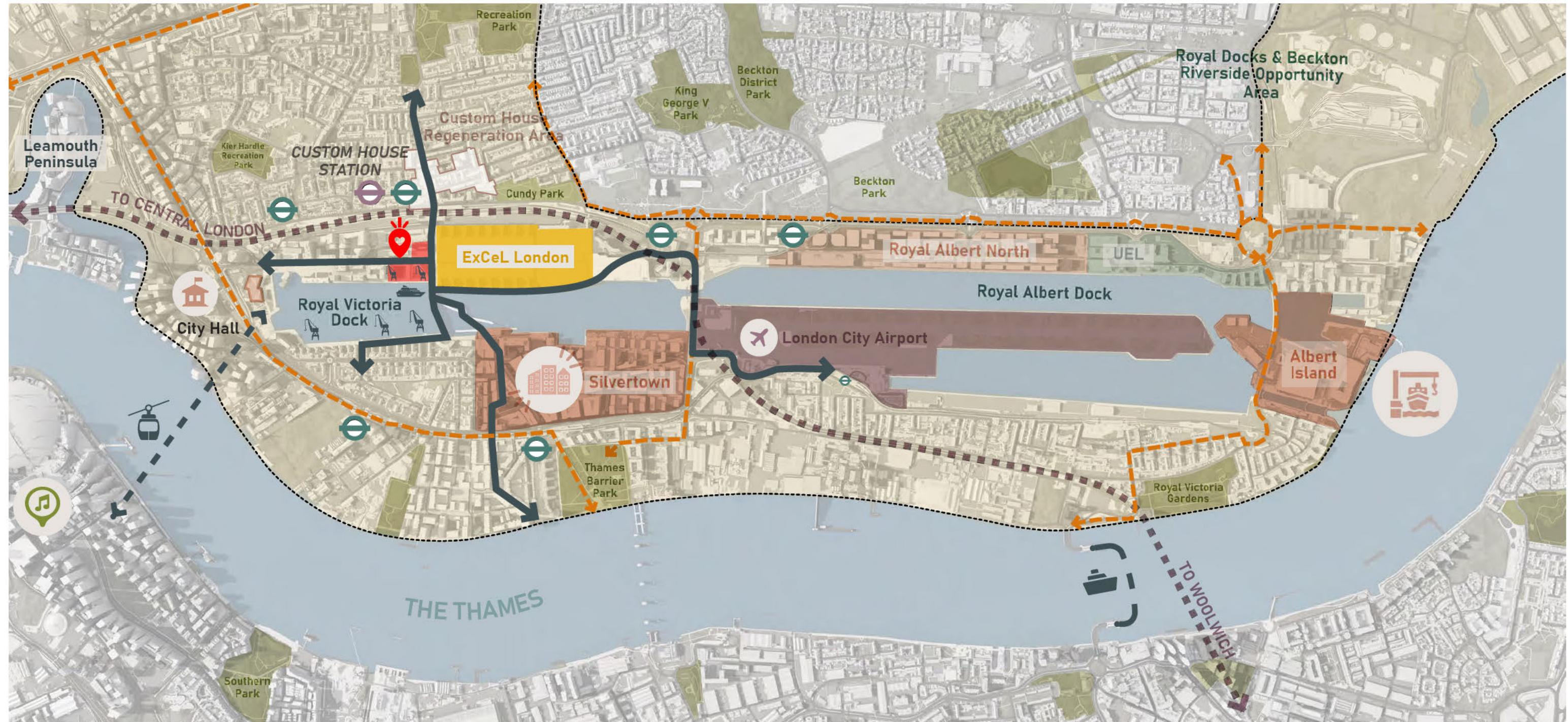
**Reimagining ExCeL London's entrance**, a key route from Custom House station to the wider Royal Docks area



# A New Gateway to the Royal Docks

## The Vision

The site is at the heart of the regeneration of the Royal Docks, with a range of development coming forward at Custom House, Royal Eden Docks, Silvertown Quays, Royal Wharf & Thameside West. It is a key movement node linking the Custom House Regeneration area to the south via the new Silvertown Footbridge. The site frames ExCeL London's front entrance and visitor experience making it a key opportunity within the Royal Docks.





# Emerging Context

Royal Docks & Beckton  
Riverside Opportunity Area

THE OPPORTUNITY





# Emerging Context

## Local Community Groups

Community and grassroots organisations are an intrinsic part of the Royal Docks history and identity.

London Borough of Newham's People Powered Places flagship programme has been recognised as an exemplar of best practice in participatory budgeting and democracy. Now in its second cycle, the 2023-25 programme has allocated another £1.6 million of CIL funding across Newham. This supports an extensive range of community-led programs and opportunities in the area. Some local examples include:

- **West Silvertown Foundation** - offers an extensive timetable of education classes and activities for both adults and children.
- **Shipman Youth Zone** - £8 million facility offering youth services and a family hub
- **Your Custom House Steering Group** - a collaborative effort between residents, council officers and architects to co-produce housing and regeneration proposals.
- **The Royal Docks Team** - established in 2017 as a joint initiative from the Mayor of London and Mayor of Newham to ensure the successful transformation of the area by working with key stakeholder and local community groups.
- **The Royal Docks Creative Connectors** - A group of ambassadors to facilitate the Royal Docks Team's ambition to become London's 'cultural engine'.





# Custom House

## Community & regeneration

### CUSTOM HOUSE MASTERPLAN FEBRUARY 2023:

The Custom House Masterplan is to the north of our proposed site, located next to Custom House station. The existing and emerging community within this area will directly link to our proposed site and be able to optimise the use of the new public realm and enhanced commercial uses, as well as having access to employment and training opportunities.

A key objective for our design is to consider how to break down the perceived barrier of the railway and open up the Royal Docks Gateway as an area that the Custom House community feels they can use and enjoy, encouraging community cohesion and extended social value benefits.





# ExCeL London Masterplan Vision

## Emerging Context



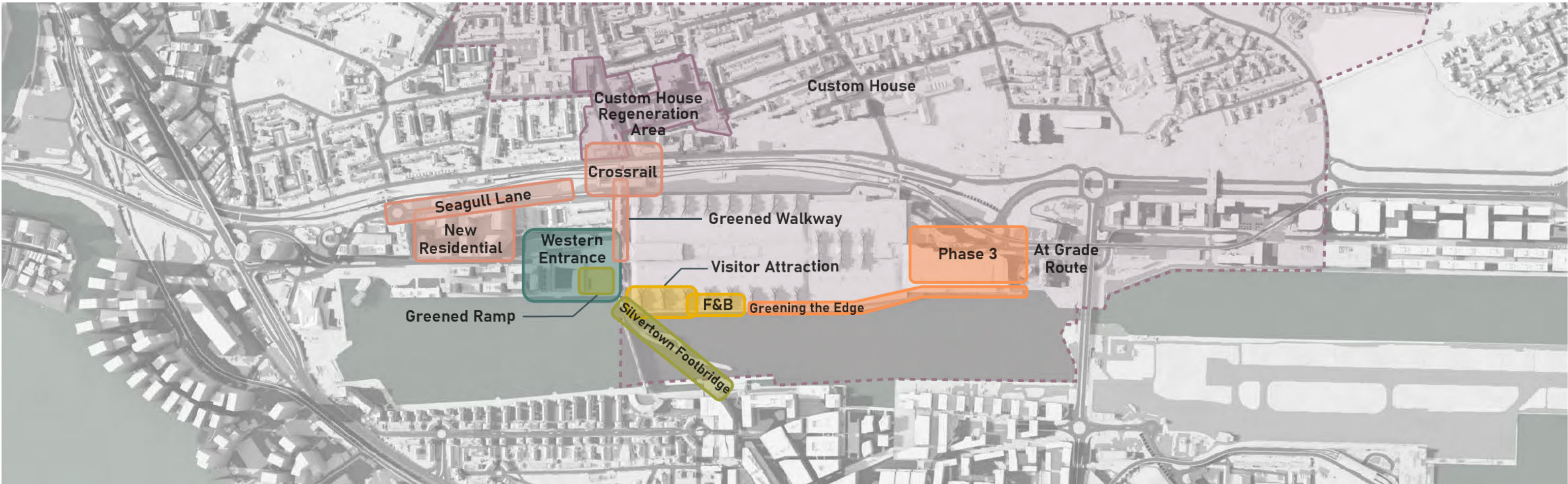
Western Gateway - Mount Anvil new residential



Waterfront Visitor Attraction



Silvertown Footbridge



ExCeL London Masterplan Vision

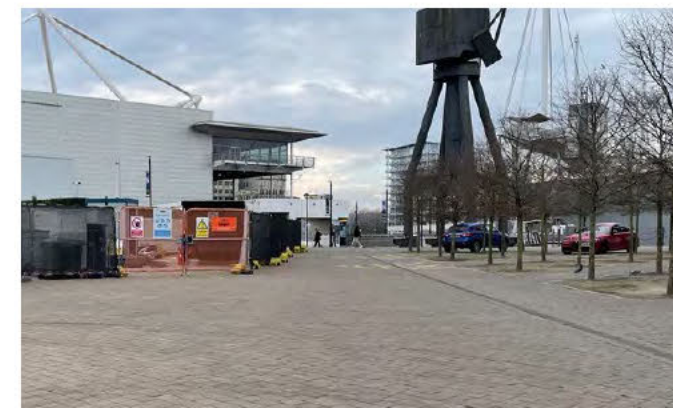
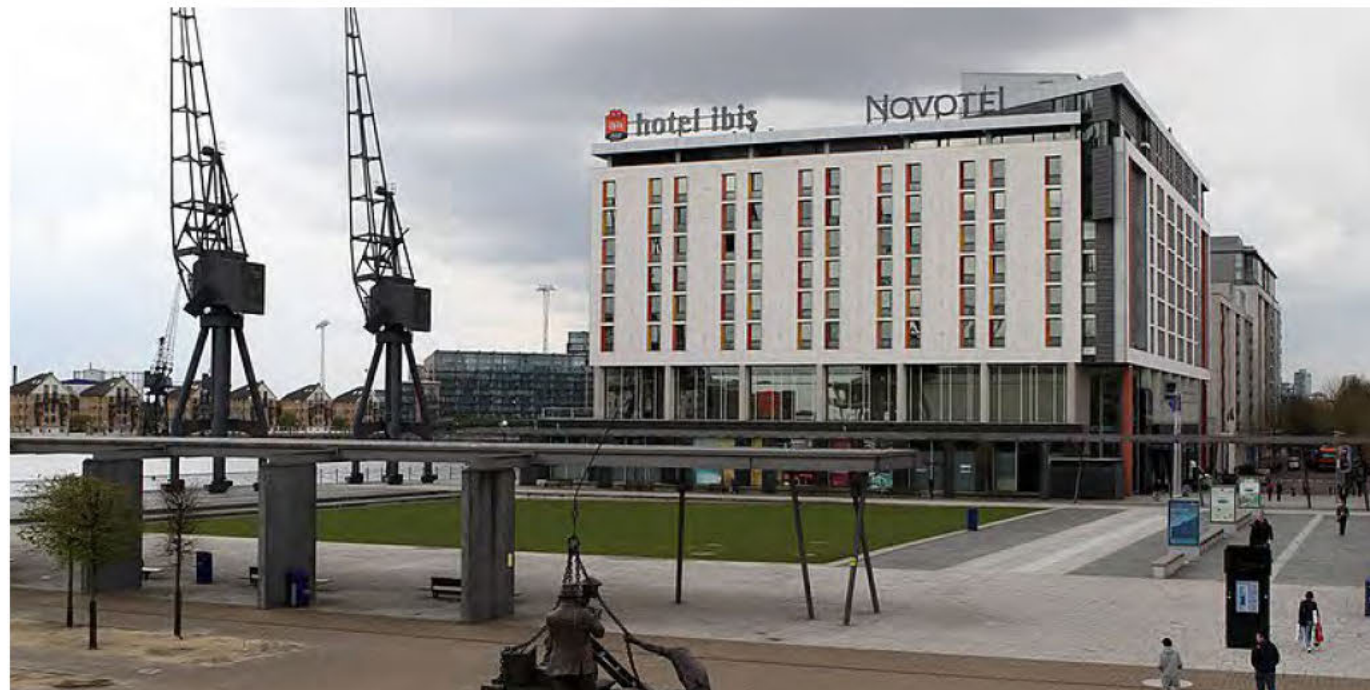
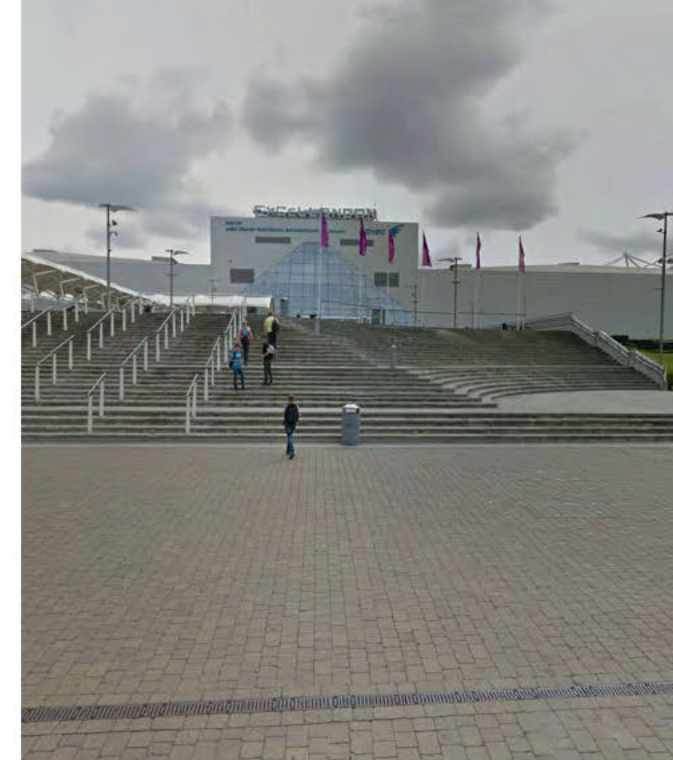
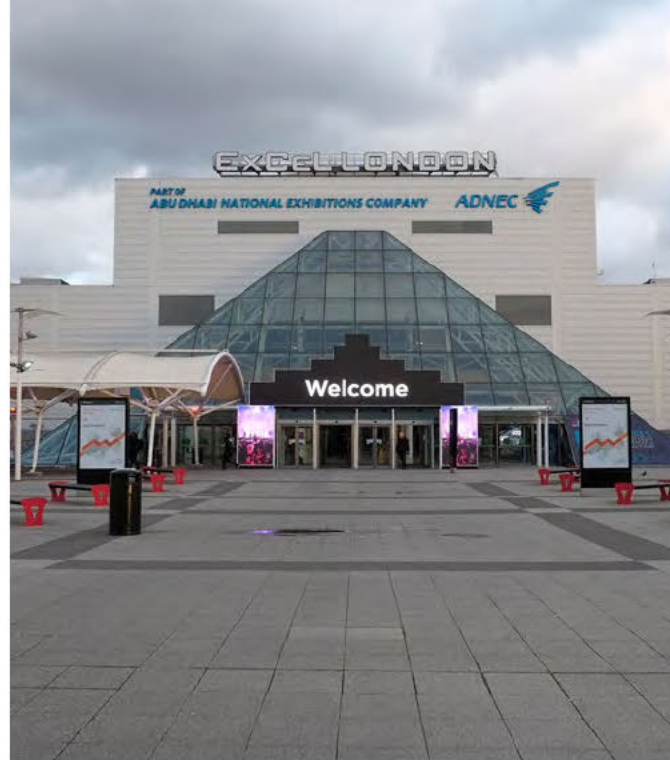


# The Public Realm

## Quality of Space

### THE CURRENT DESIGN ISSUES:

- Poor legibility between key routes, particularly to the new Silvertown Footbridge
- Extensive hard landscape
- Underprovided and underutilised green space
- Lack of biodiversity
- Limited celebration of the water edge
- Level change creates a disconnect and barrier to movement
- Lack of ground floor containment and activation
- No obvious programme to encourage public use
- Not fit for purpose to suit the evolving local area, the space is outdated and underperforming
- Does not meet the needs of the wider community or welcome use
- Existing green spaces are not well used, with very low footfall, as confirmed by our survey data



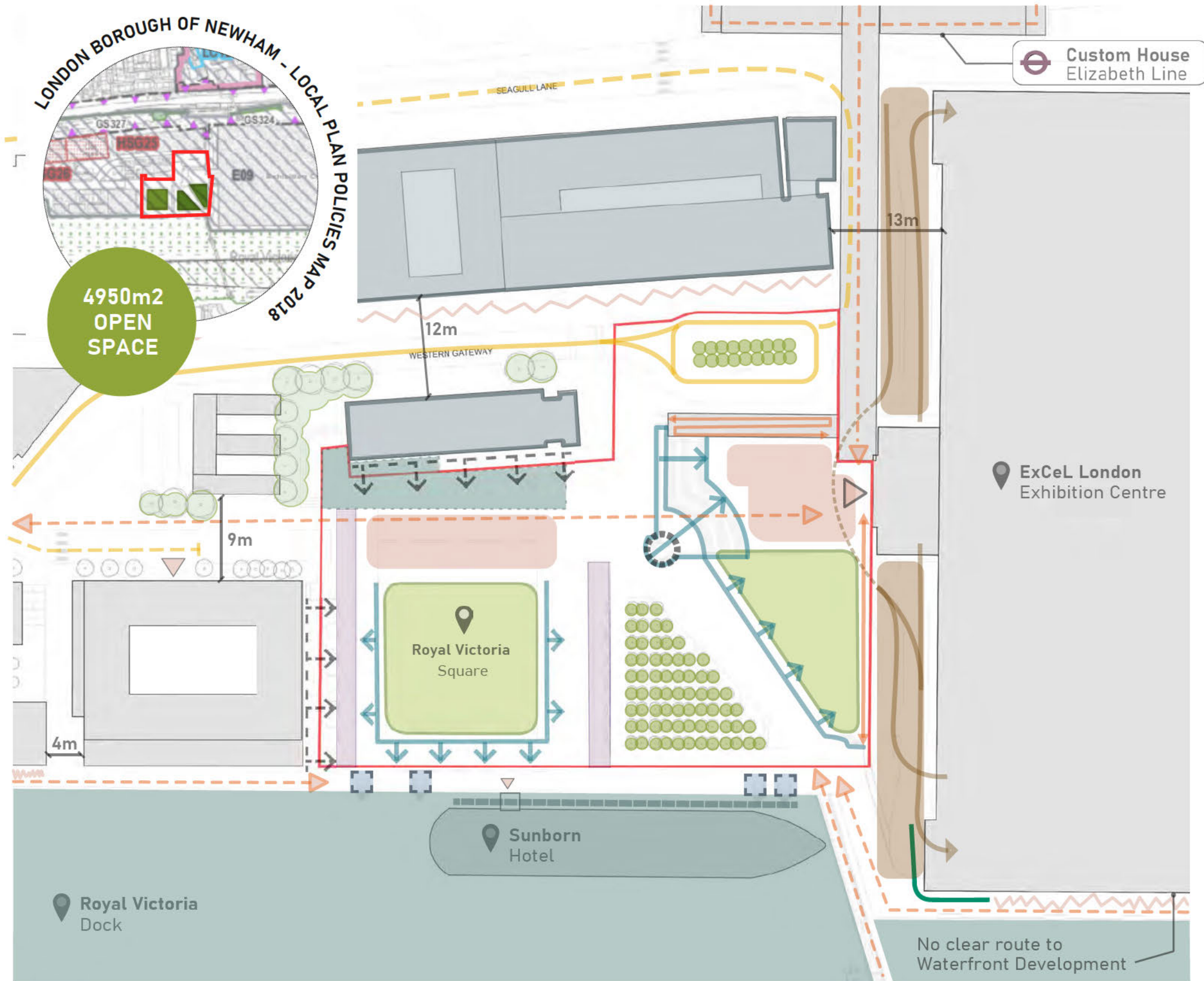


# The Site

## Constraints

The below diagram sets out the constraints of the site. Highlighting key areas which we intend to focus on through the design development.

- Key**
- Site boundary
  - Listed buildings with historical architectural character
  - Existing key building entrance to ExCeL London
  - Existing active frontage
  - Direction of overlooking from existing built form
  - Sunborn Hotel
  - Significant areas lacking identified use
  - Poor quality shelters
  - Level change: poor quality stepped access
  - Primary pedestrian routes
  - Poor integration of ramped access
  - Primary vehicular access
  - Secondary vehicular access
  - Pleached trees with limited biodiversity
  - Poor quality and underutilised green space
  - Pond with lack of surrounding activation
  - Current construction development
  - Existing building servicing zones
  - Existing servicing route to ExCeL London
  - Below ramp servicing route to be maintained
  - Low quality frontage to corner of ExCeL London
  - Sensitive design context due to the listed cranes



Constraints Diagram

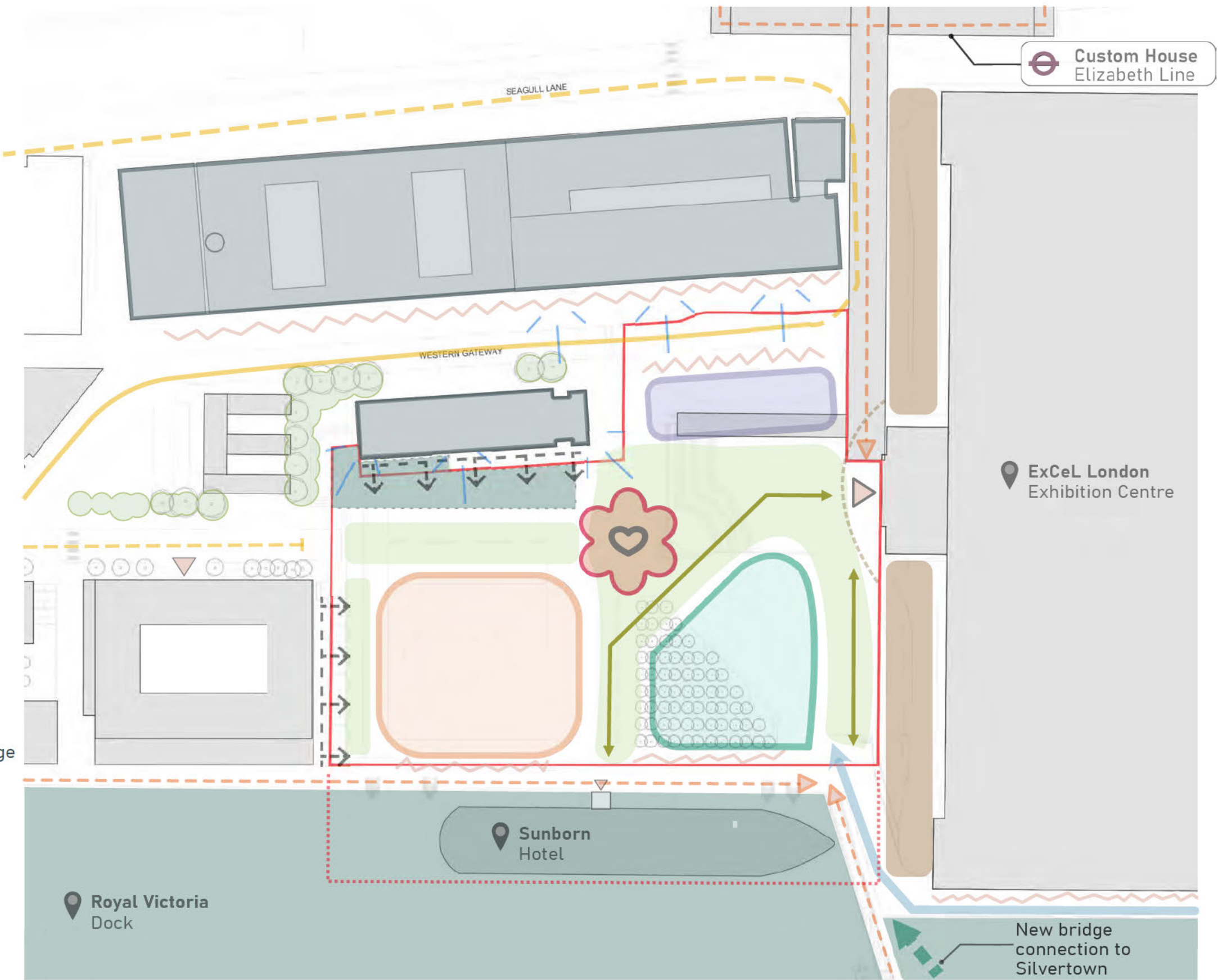


# The Site

## Opportunities

The site location at the heart of Royal Docks has many opportunities which are identified on the diagram opposite, emphasising the need for development to come forward in such a key location.

- Key**
- Site boundary
  - Buildings with historical architectural character
  - Celebrate heritage of the site in approach routes
  - Increase active frontage
  - Flexible public space
  - Opportunity to create a destination
  - Overlooking orientated to key zones
  - Below ramp servicing route to be maintained
  - Primary pedestrian Routes
  - Primary vehicular access
  - Secondary vehicular access
  - Integrated ramped access by urban greening
  - Opportunity to connect to waterfront edge & new bridge
  - New bridge connection to Silvertown
  - Complete the street edge with an apart/hotel building
  - Events building location to activate public realm
  - Residential location to activate public realm
  - Meaningful public open space with considered design



Opportunities Diagram

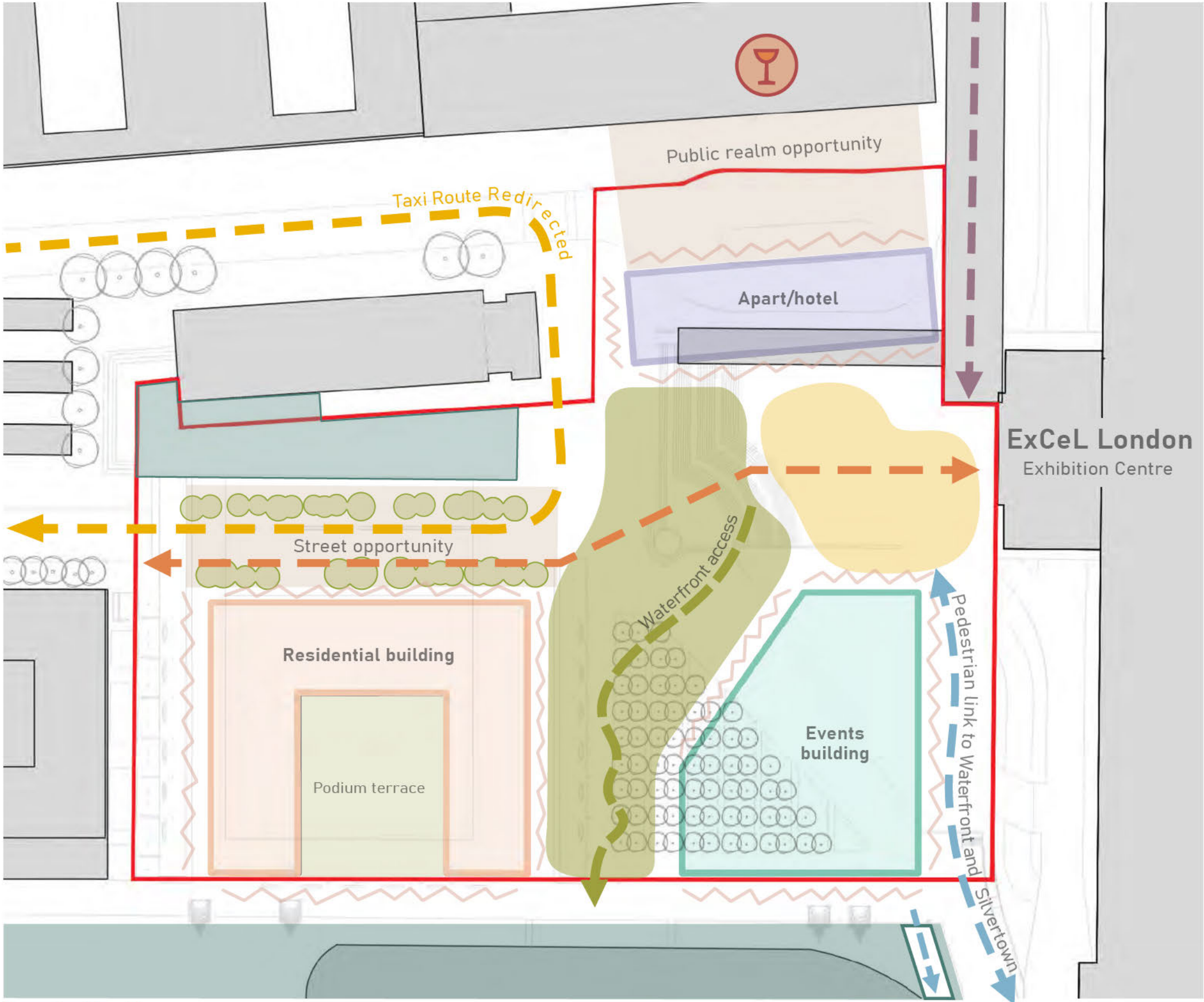


# The Site

## Opportunities

Considering the identified constraints and opportunities of the site, the following diagram represents the proposed key design decisions.

- Key**
- Site boundary
  - Pedestrian route through site
  - Vehicular access
  - Connection to waterfront via public open greenspace
  - Opportunity to connect to waterfront edge & new bridge
  - Improved journey from the station through an active public realm
  - New active frontages
  - Open greenspace
  - Meaningful public open space
  - Plaza activated by entrance to ExCeL London
  - Apart/hotel building
  - Events building
  - Residential development providing affordable housing
  - Existing buildings
  - The Fox ExCeL (existing)



Opportunities Diagram

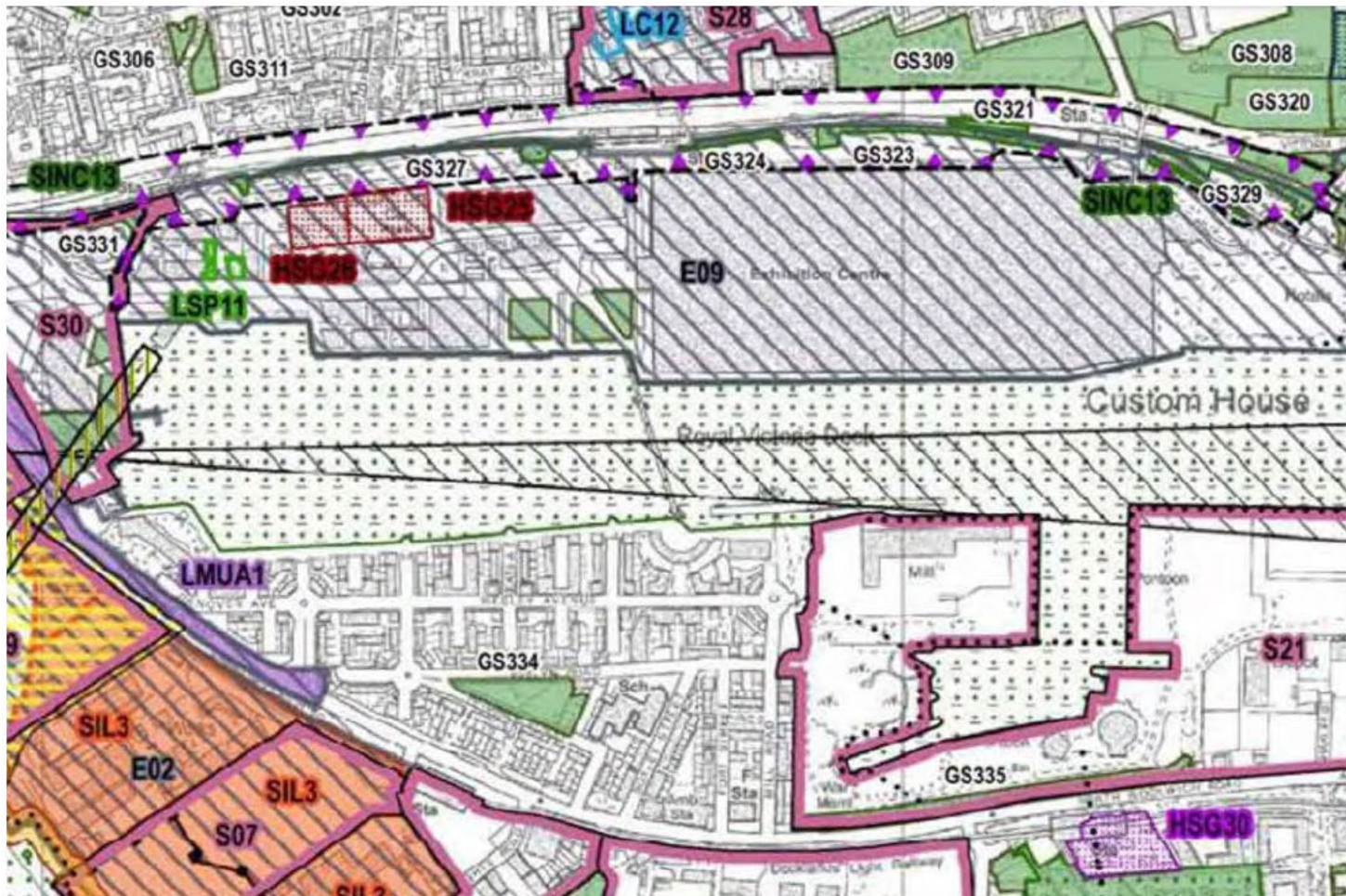


# Planning Policy Context

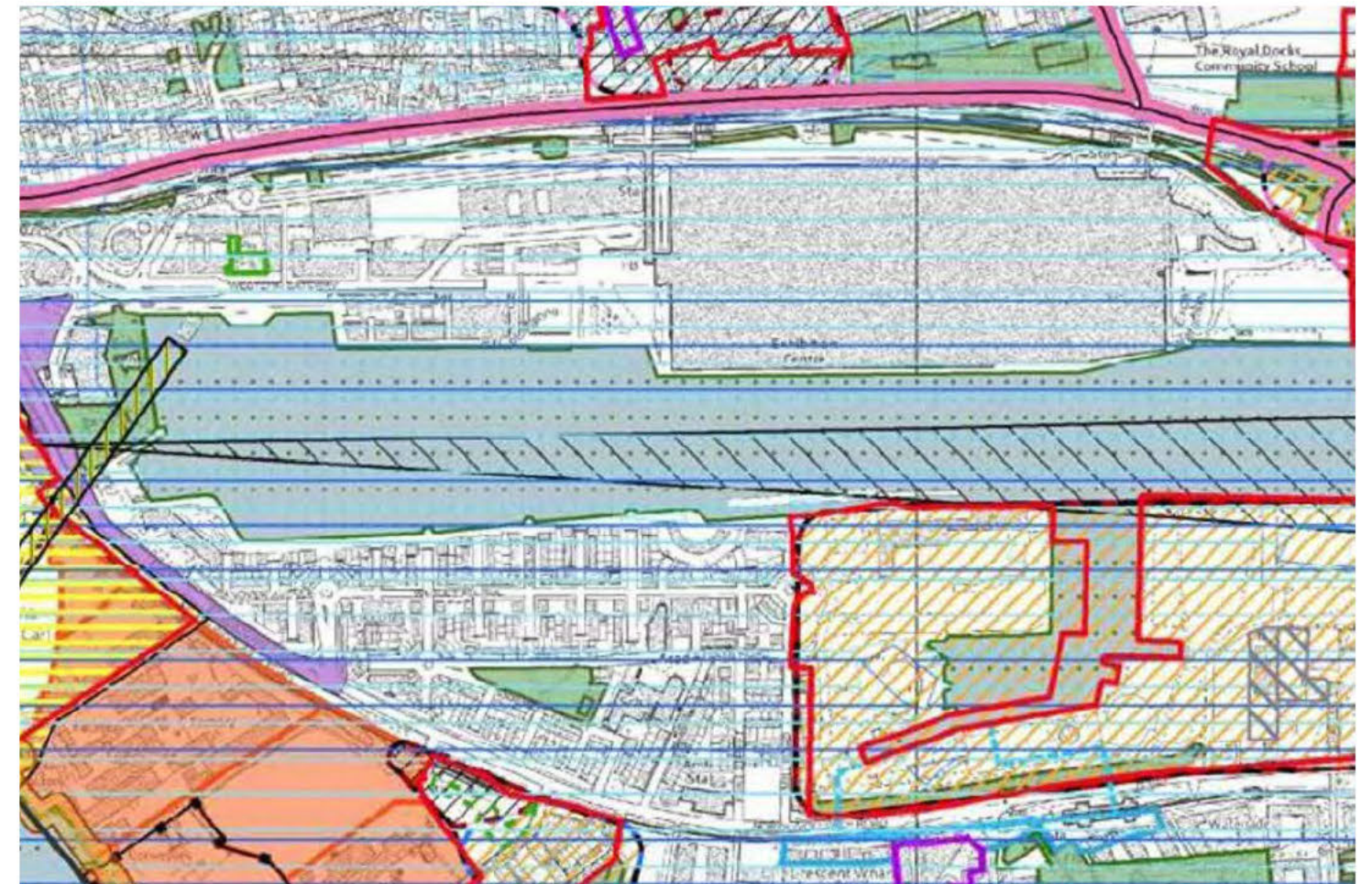
## Open Space

- The site is located within the Royal Docks & Beckton Riverside Opportunity Area
- The adopted Newham Local Plan allocated the site within a wider 'Employment Hub'
- The adopted Newham Local Plan Policy Map allocated the three existing landscaped spaces as 'Green Space'
- However, the emerging Newham Regulation 18 Local Plan Map does not include any allocation for the existing landscaped spaces

- The previous Green Space allocation is consequently proposed to fall away, although we appreciate that the Newham Regulation 18 Local Plan seeks to generally protect existing open spaces.
- Therefore, we are seeking to retain the quantum of green space and provide it within the new design to a higher quality, to encourage greater use.



Adopted Local Plan Policies Map 2018



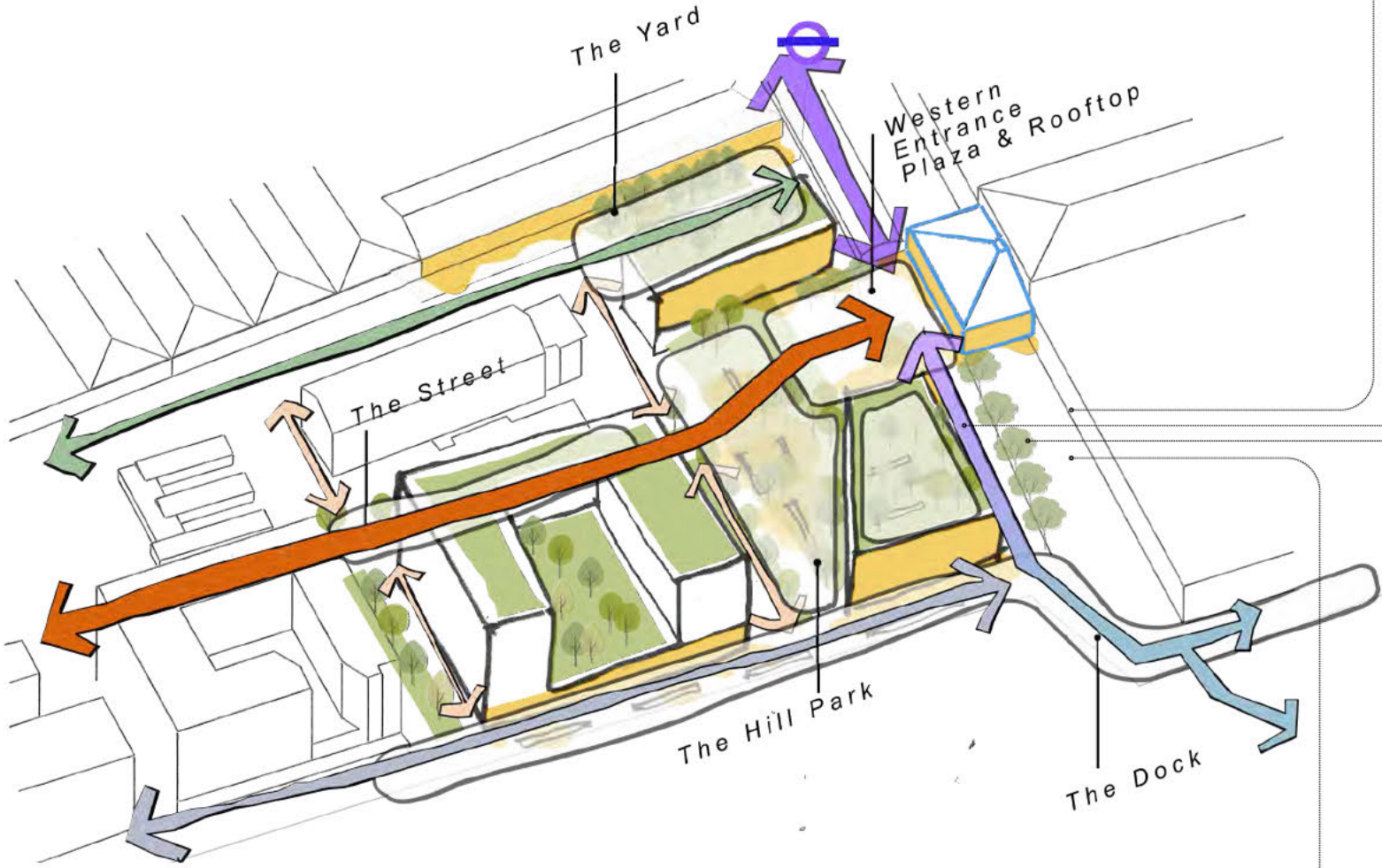
Emerging Local Plan Policies Map 2023



# Public Realm

## Layering The Landscape

MASTERPLAN VISION

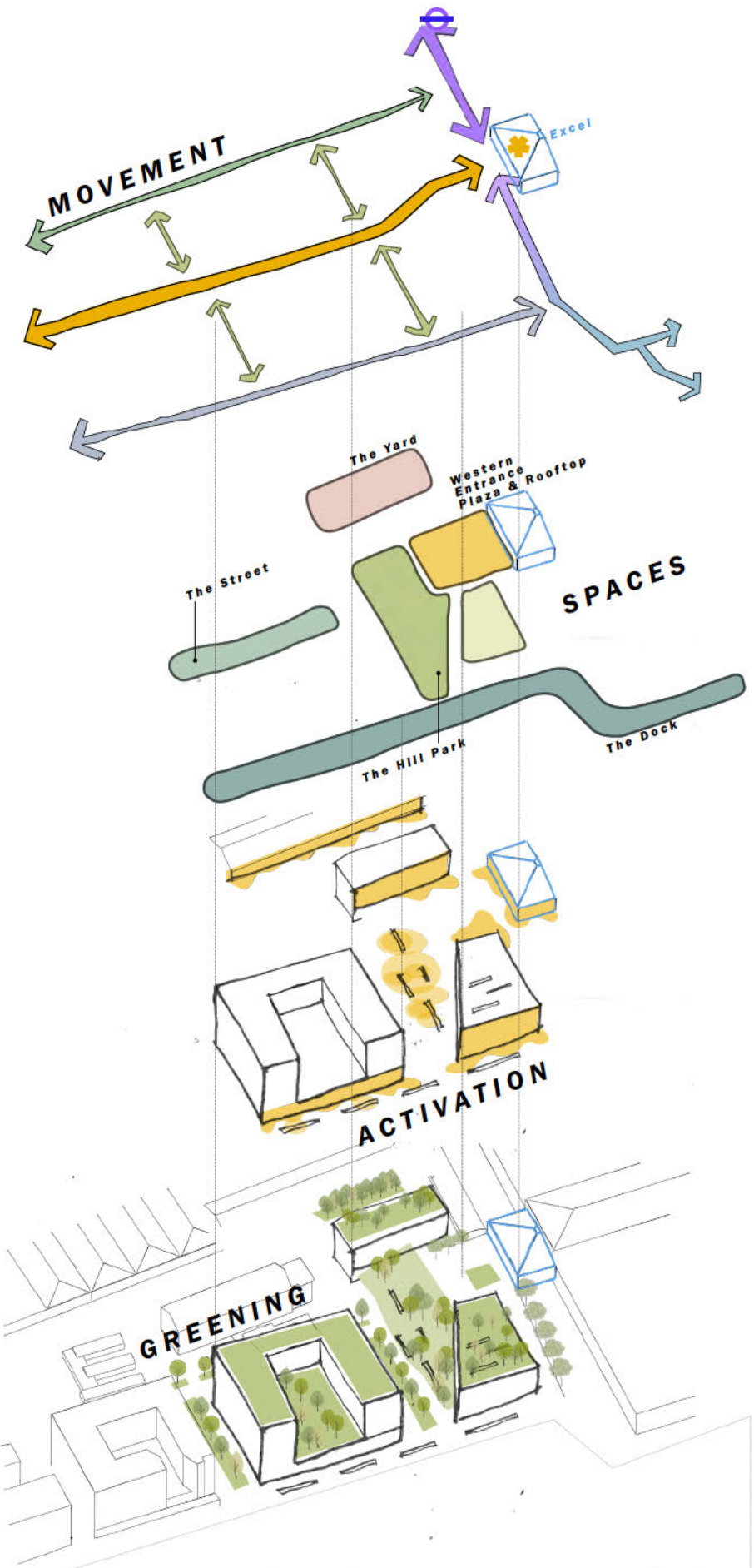


**Movement**  
Linked by a series of accessible pathways

**Spaces**  
A diverse sequence of public open space

**Activation**  
Unlocking a vibrant public realm

**Greening**  
A landscape teaming with biodiversity

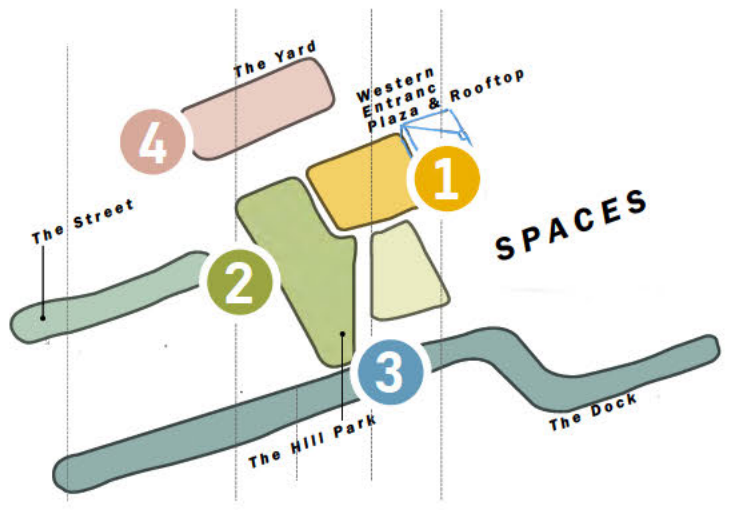




# Developing the Masterplan

## Public Realm

The public realm offers a unique opportunity to unlock previously underutilised open space. The landscape extends down from a plaza adjacent to the western entrance of ExCeL London, leading people to the waterfront and wider public realm enhancements.



### Key

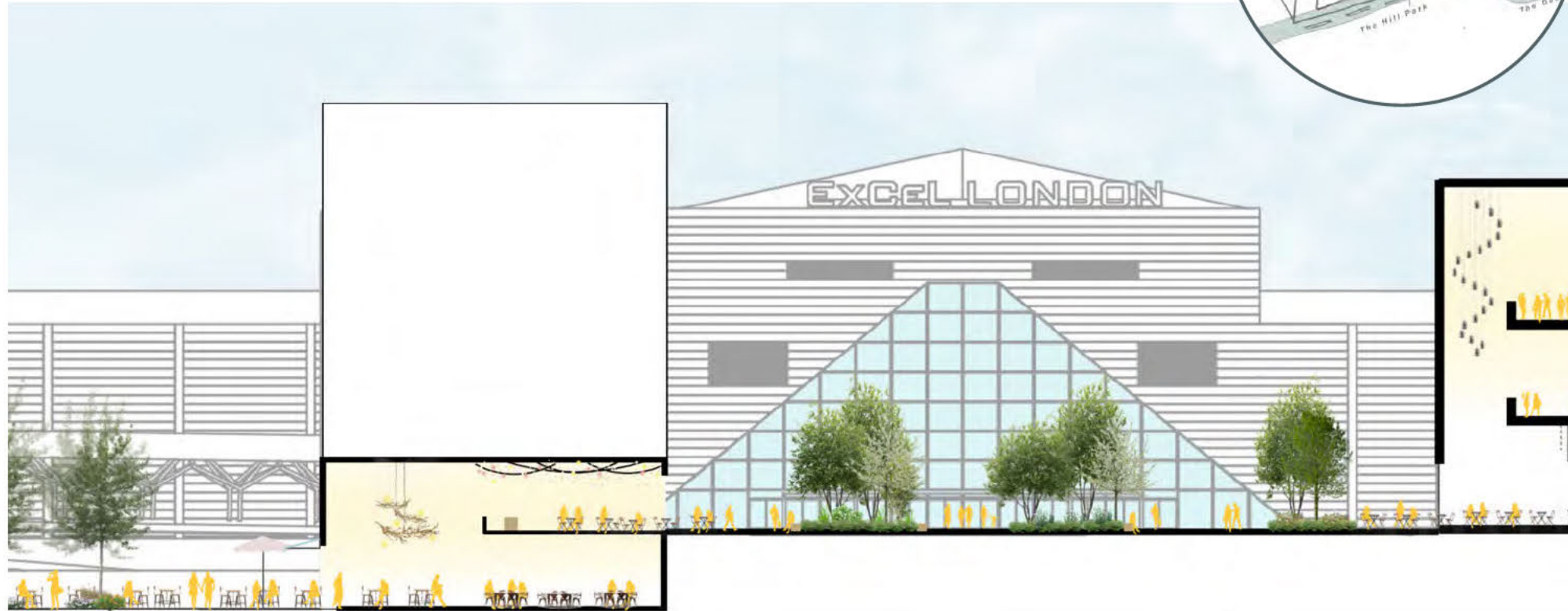
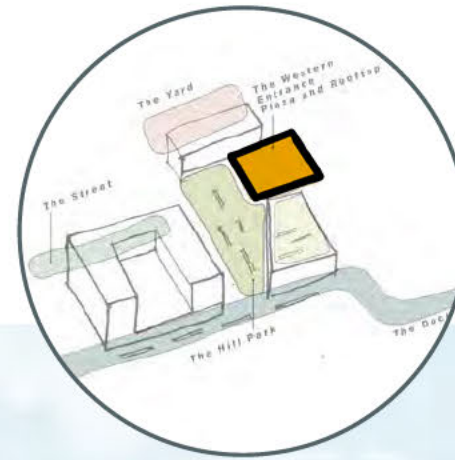
1. The existing entrance steps reimagined to create a generous plaza space, activated by ExCeL London western entrance, a new hotel lobby and events building.
2. The mound garden sits on the primary N-S corridor, offering generous planting and seating to utilise views and encourage people down to the Royal Victoria Dock.
3. The waterfront connects users with the Royal Victoria Dock, active frontages, the new waterfront development and wider connections to Millennium Mills & Silvertown.
4. A new public square activated by F&B opportunities and reimagines the former taxi turning circle as a piazza/square.



# 1 Entrance Plaza

## Public Realm

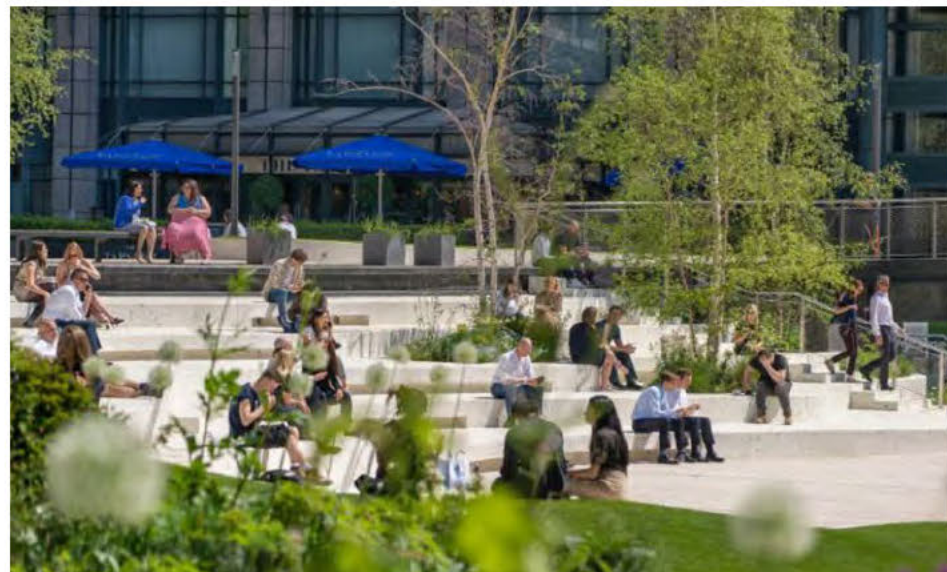
A generous plaza space, activated by ExCel London's western entrance, a new hotel lobby and events building.



North-south section through apart/hotel and events building



Indicative sketch of the events building



Exchange Square, London



Pancras Square, London



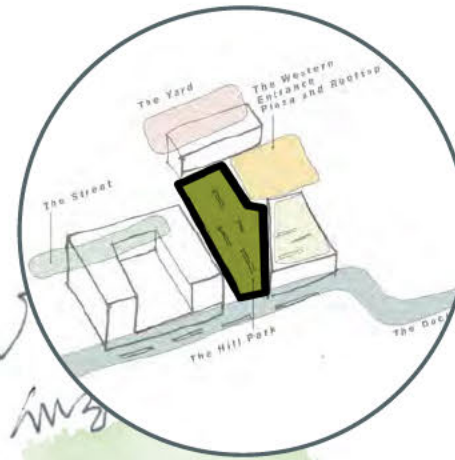
Woolwich Square, London



## 2 The Mound

### Public Realm

The mound is a garden with generous planting and seating to utilise views and encourage people down into the Royal Victoria Dock. The level changes encourage visitors to engage with the public realm, utilising seating and open spaces down to the waters edge.



Greenford Quay, Ealing



Queen Elizabeth Olympic Park, Stratford



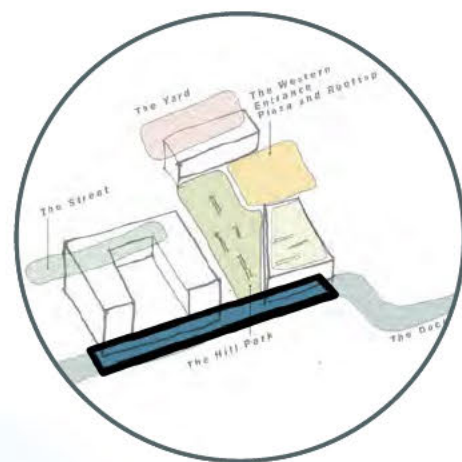
BBC Television Centre, Shepherd's Bush



### 3 The Waterfront

#### Public Realm

The waters edge connects users with the Royal Victoria Dock, the new ExCeL London waterfront development and wider connections to Millennium Mills, Silvertown & Custom House.



Princes Wharf, Bristol



Vancouver Waterfront, Canada



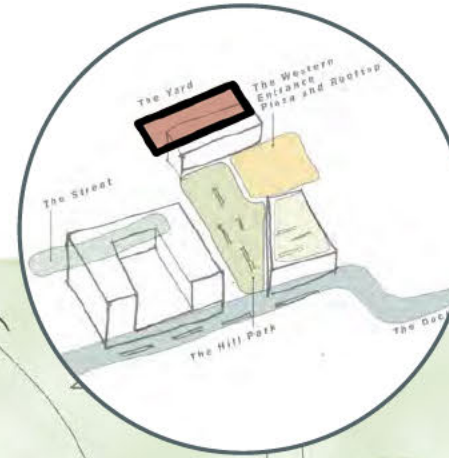
Southbank Boardwalk, London



## 4 The Square

### Public Realm

A new public square unlocks further F&B opportunities and reimagines the former taxi turning circle.



Coal Drops Yard, Kings Cross



Granary Wharf, Leeds



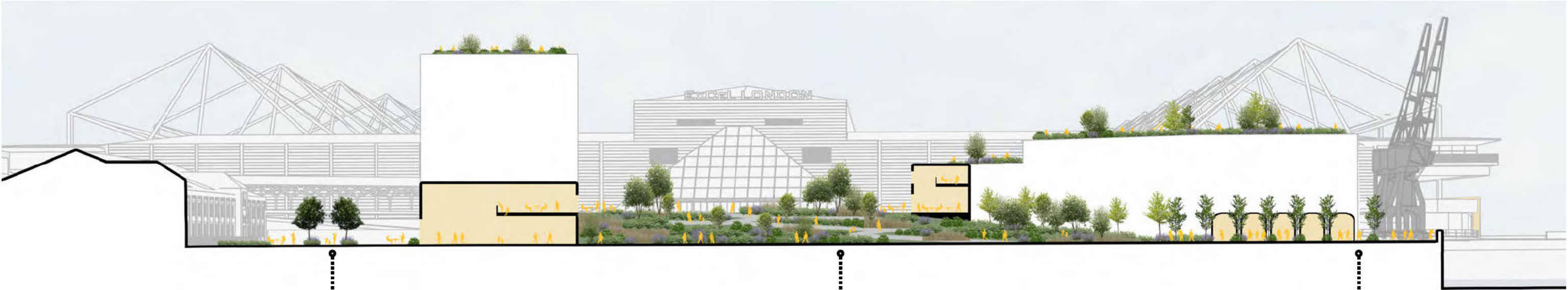
Castlefield, Manchester



# The Vision

## Public Realm

Illustrative section which spans the length of the site from north to south. The sequence of spaces provides a vibrant place for people and nature to thrive.



The Square



The Mound

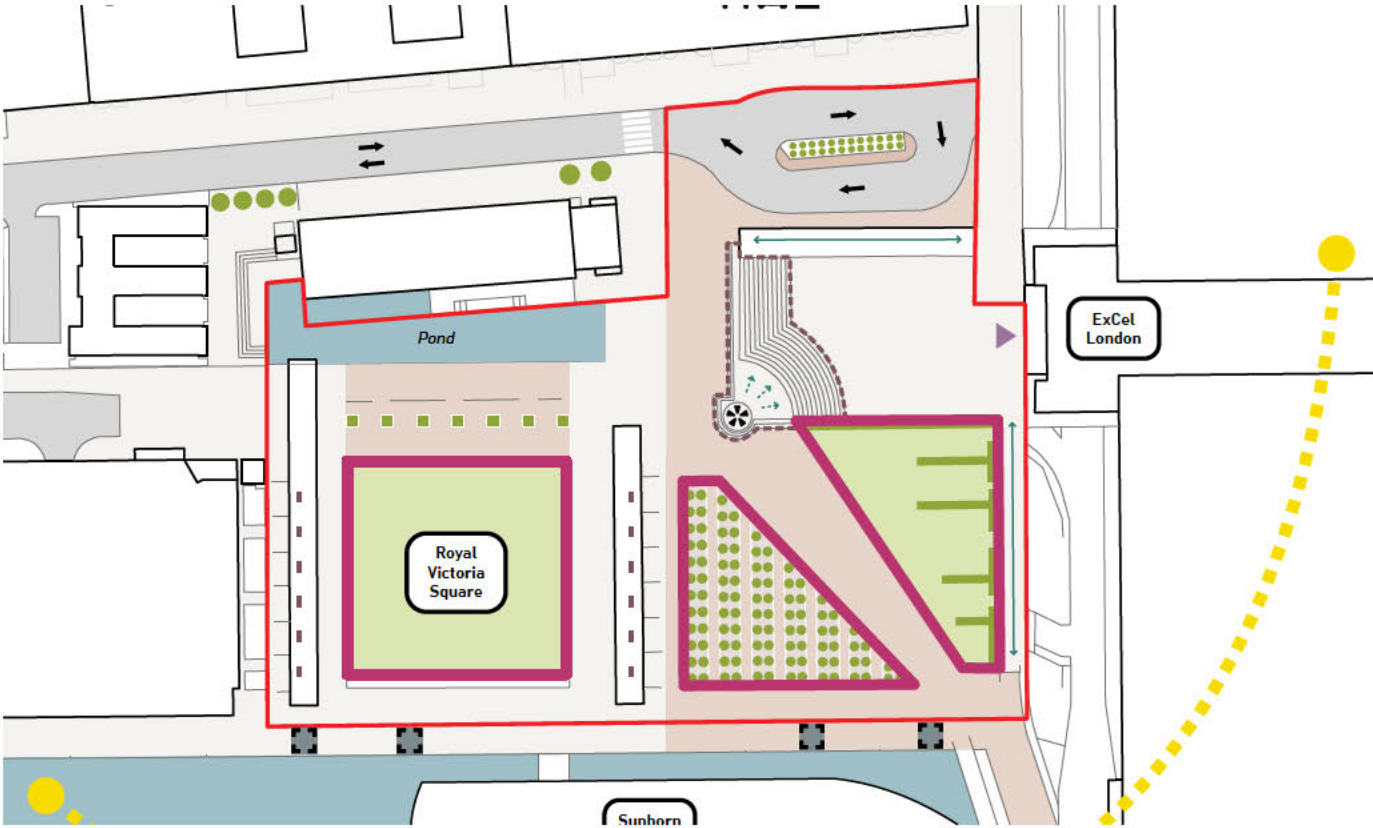


The Waterfront



# Landscape Metrics

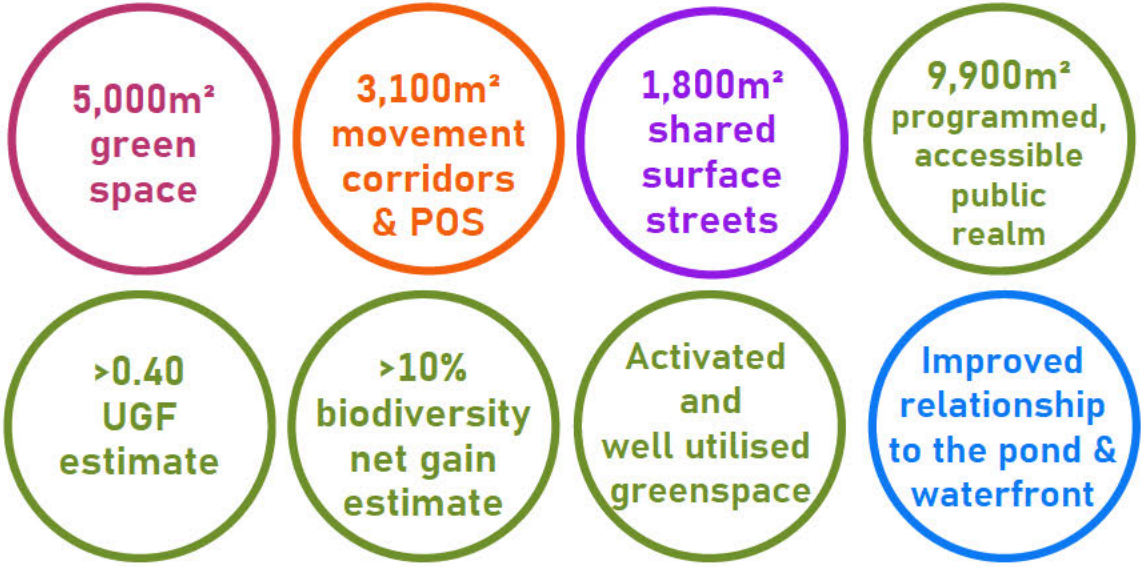
## Initial Assessment



Estimate of Existing Landscape Metrics



Estimate of Proposed Landscape Metrics





# The Proposed Buildings

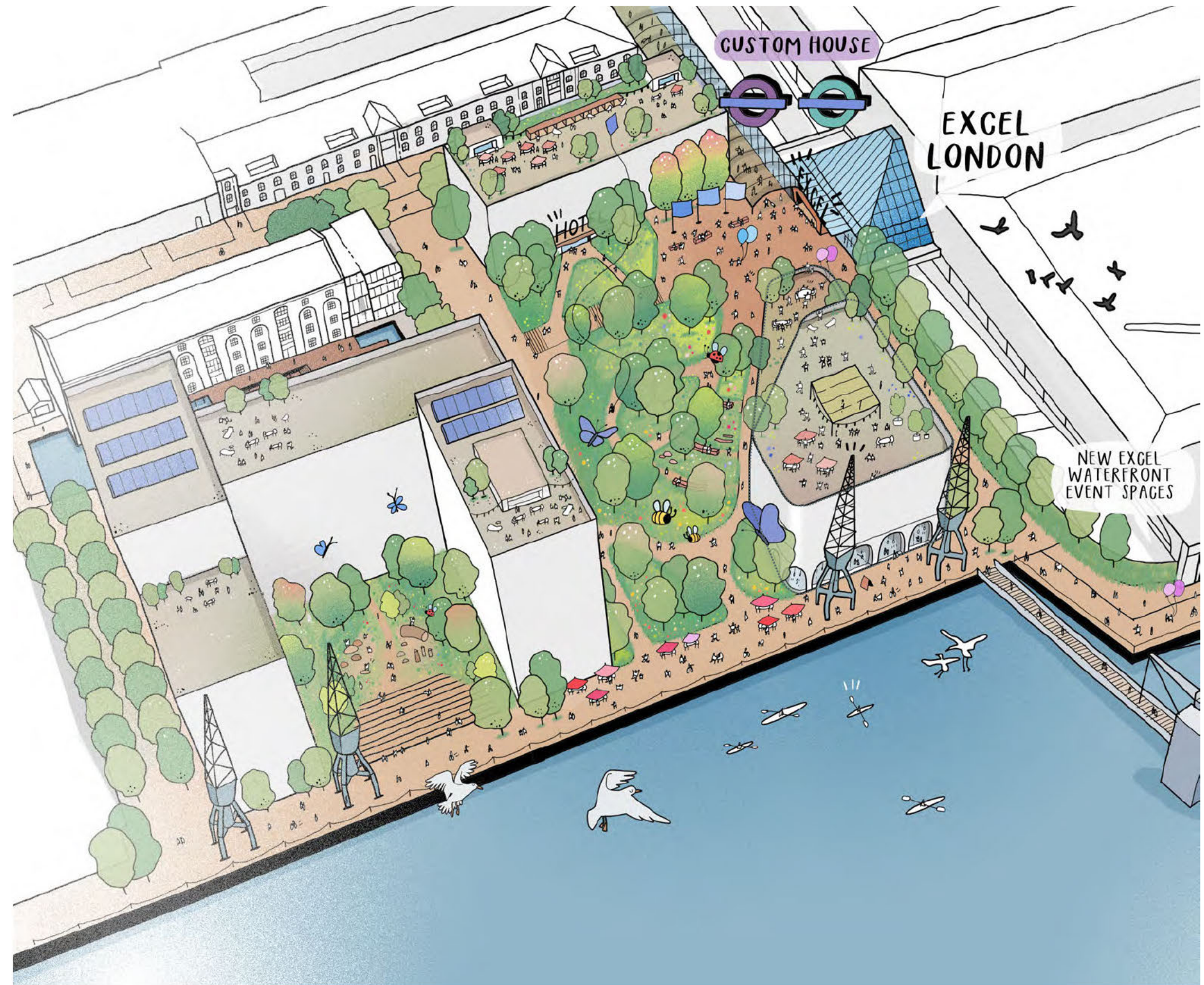
## Summary

### KEY METRICS:

Reinvigorating a key piece of public realm in a highly accessible location at the Royal Docks, acting as a gateway and linking the key communities of Custom House and Silvertown.

This opportunity is enabled by the delivery of:

- A world-class immersive entertainment destination providing **8,000sqm** of events space
- Providing **325-375** new homes, including affordable homes
- Providing a new **apart/hotel** with bar and F&B space
- **1,500sqm** of additional F&B space



Indicative Sketch



# A New Gateway to the Royal Docks

## Key Benefits



**New central arrival point** to the Royal Docks unlocked by the Elizabeth Line. Creating a world class cultural destination



**Beautifully bold and bespoke enhanced public realm** focused on a varied & engaging programme of spaces for culture, tourism, visitors & the existing community



**Improving connectivity** from Custom House & Silvertown, north-south.



**Local opportunity** for growth, providing new jobs and training in the heart of Newham. Connecting to the existing Custom House Community



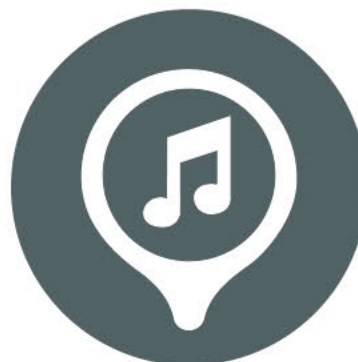
**Improved connectivity with the water** to connect users with Royal Victoria Dock, the new ExCeL London waterfront and surrounding developments



**A range of land uses** providing activated public spaces with diverse commercial uses. Incorporating residential, apart/hotel, entertainment and F&B



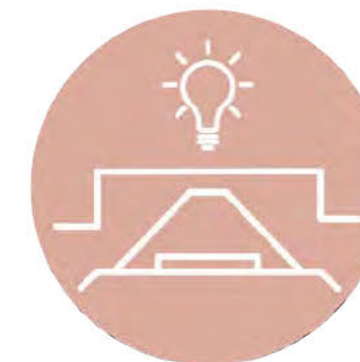
**325-375 new homes** on a major LBN public transport node. With the provision of affordable housing



**Entertainment and apart/hotel accommodation** aligned with the visitor designation objectives for the Royal Docks and supporting ExCeL London's strategic role as London's largest exhibition venue



**Heart for movement**, a gateway between Custom House & Royal Victoria Dock and to the wider emerging communities



**Reimagining ExCeL London's entrance**, a key route from Custom House station to the wider Royal Docks area

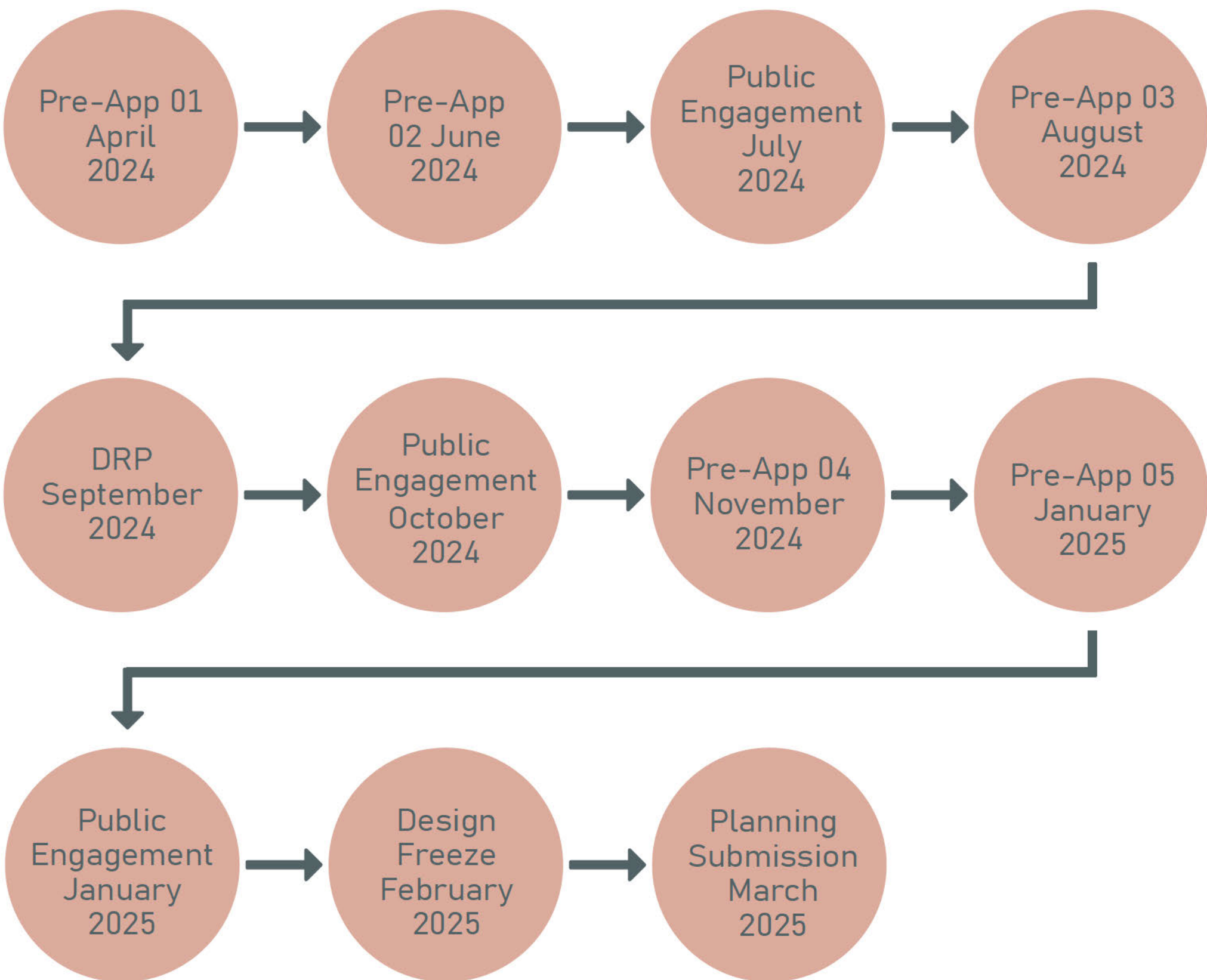
# Next Steps

## Pre-application

KEY OBJECTIVES:

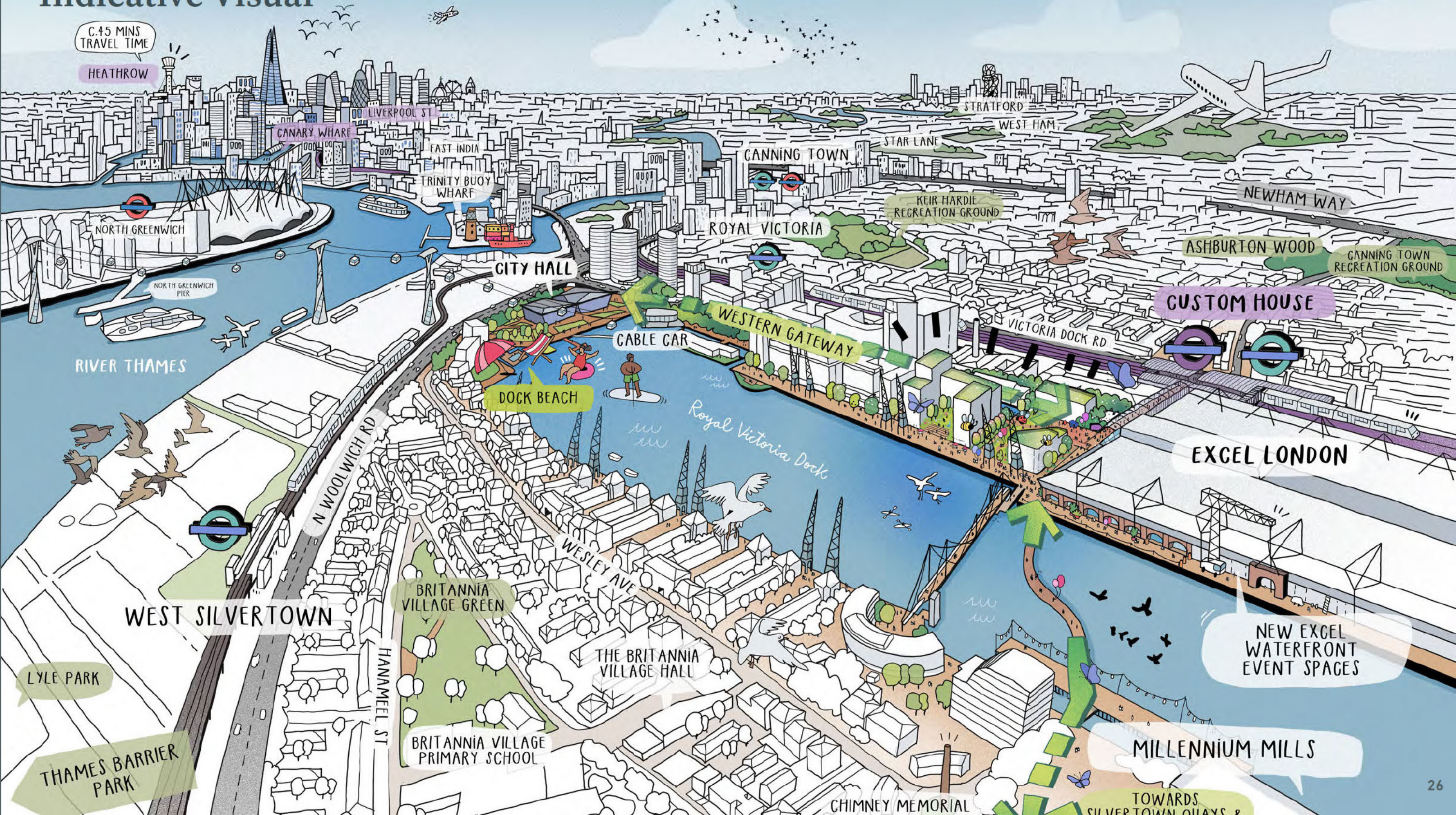
- Commitment to partnership, working to evolve the masterplan together with LBN and GLA
- PPA to be agreed
- High level programme including Design Review Panel & Community Engagement
- Collaborative approach to Pre-Application meetings & Design Workshops with LBN

### High Level Programme





# Indicative Visual



C.45 MINS  
TRAVEL TIME

HEATHROW

CANARY WHARF

LIVERPOOL ST

EAST INDIA

TRINITY BUOY WHARF

NORTH GREENWICH

NORTH GREENWICH PIER

RIVER THAMES

CITY HALL

ROYAL VICTORIA

WESTERN GATEWAY

CABLE CAR

DOCK BEACH

Royal Victoria Dock

STAR LANE

CANNING TOWN

KEIR HARDIE RECREATION GROUND

ASHBURTON WOOD

CANNING TOWN RECREATION GROUND

CUSTOM HOUSE

VICTORIA DOCK RD

EXCEL LONDON

NEW EXCEL WATERFRONT  
EVENT SPACES

MILLENNIUM MILLS

TOWARDS  
SILVERTOWN QUAYS &

CHIMNEY MEMORIAL

BRITANNIA VILLAGE GREEN

THE BRITANNIA VILLAGE HALL

BRITANNIA VILLAGE PRIMARY SCHOOL

WEST SILVERTOWN

LYLE PARK

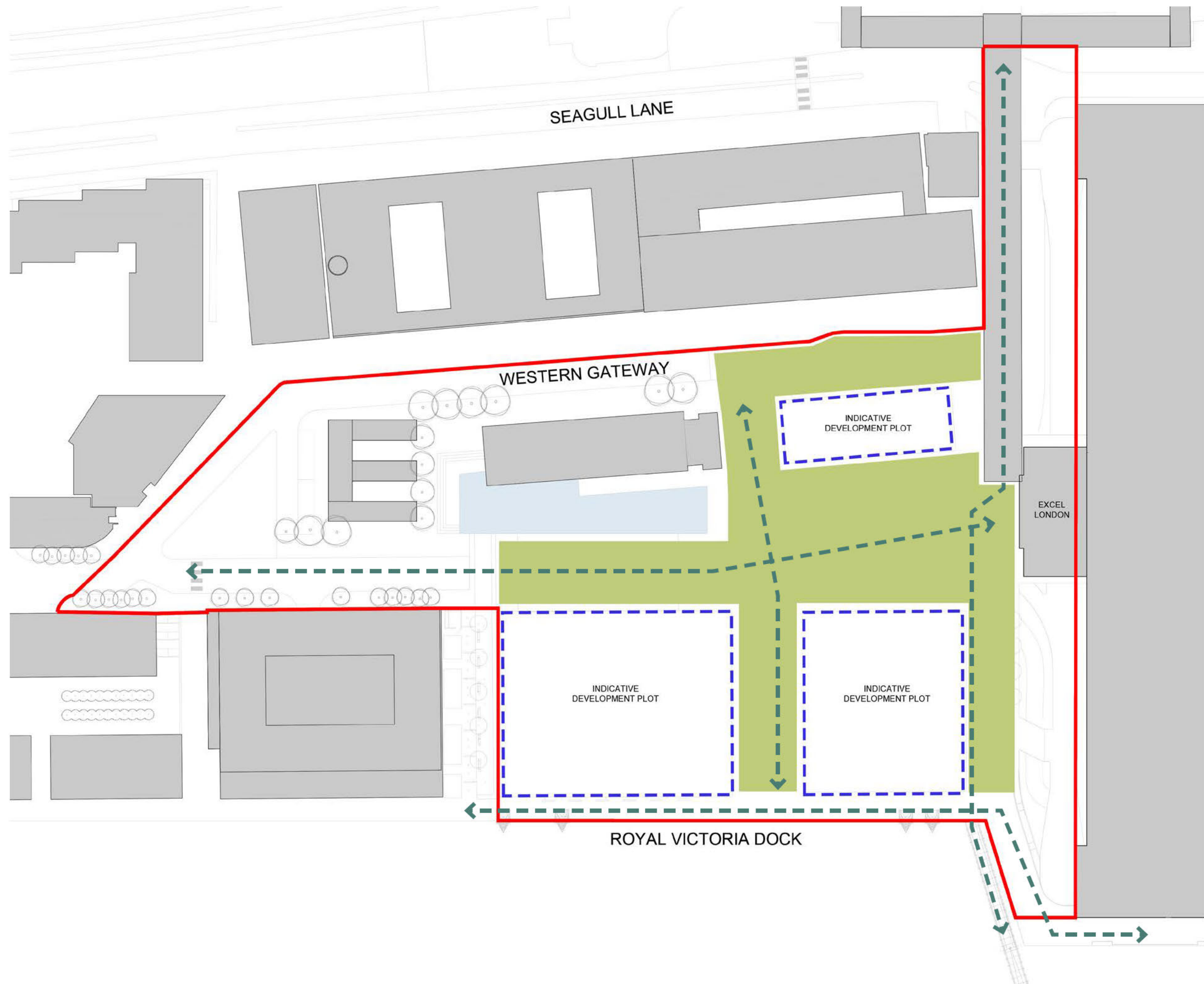
THAMES BARRIER PARK

HANMELL ST

WESLEY AVE

N WOOLWICH RD





## **LB Newham, Regulation 19 Draft Local Plan: Representations on Site Allocation (Royal Docks Gateway)**

17<sup>th</sup> September 2024

The Townscape Consultancy has prepared the following representations in response to the consultation being undertaken on the Regulation 19 version of the draft Newham Local Plan. The representations have been prepared with a focus on the potential heritage, townscape and visual impact implications of the emerging policy in relation to the development potential of the Site at Royal Docks Gateway.

The Royal Docks Gateway is largely open and consists of hard landscape, a water feature and green space. It is bounded to the north by the grade II listed Warehouse W and Western Gateway, to the east by the ExCel Centre, the south by the waterfront of the Royal Victoria Dock and west by large scale hotel development. The Site is also located within the immediate setting of the grade II listed Warehouse K, as well as four grade II listed cranes to the south along the waterfront.

The Site falls within the newly added 'N2.SA5 Excel Western Entrance' site allocation within the Royal Docks character area. In a wider context, it is also located within the Royal Docks and Beckton Riverside Opportunity Area. It is noted within the Newham Characterisation Study (Updated June 2024) that the Royal Docks character area is rapidly changing from its past industrial character to a mixed-use residential one. The allocation has been informed by the findings of the Newham Characterisation Study, and the recently published Tall Buildings Annex (July 2024) by LBN.

The Townscape Consultancy has considered the emerging proposals prepared by our clients' architects. Based on our analysis of the Site's townscape and heritage context our findings deviate from the approach considered by LBN to be appropriate. We consider that the Site has greater capacity for height and volume than illustrated in the LBN Local Plan and evidence base, primarily the Newham Characterisation Study and Tall Buildings Annex.

### ***Overview of the Site context***

The building of the Royal Docks followed the arrival of the railways in 1846-7. Royal Victoria Dock, which once formed part of the Site, was constructed between 1850 and 1855; the Royal Albert Dock, further to the east, between 1875 and 1880; and King George V Dock, to the south of that, in 1912. They were built to accommodate large cargo ships and liners and were connected by railway.

Warehouse structures started to appear in the area during the 1850s and 1860s. The Site and its immediate surroundings at this time formed part of the dock itself as well as two warehouses, H and C, built out on jetties.

By the 1950's most of the historic warehouses had been demolished and the waterfront replaced with modern large scale warehouse buildings. A map from the 1960's depicts the modern warehouses as

extant with railways crossing between them. It also shows one such large scale modern warehouse within the Site boundary and in front of Warehouse W, demonstrating that the site did not feature open space at this time.

In recent decades, the character of the wider area around the Site has changed considerably. The Royal Docks, which had been in decline from the 1960s, began to be acquired by the London Docklands Development Corporation (LDDC) from 1981. The quaysides were gradually cleared, and new buildings constructed. It was during this period that the warehouse within the Site was also demolished as part of the wider development of Royal Victoria Docks. In 1998 permission was granted for the ExCel Exhibition Centre, adjacent to the Site, which opened in 2000 and stimulated further growth in the area. The extension of the DLR to the Royal Docks area between 1992 and 1994 (Beckton line) and 2004-2009 (City Airport/ Woolwich lines) were also key catalysts for its development. Large-scale modern residential schemes have been recently constructed on former industrial sites, particularly to the west of the Site.

### ***Immediate Townscape***

The townscape within the vicinity of the Site is varied but includes primarily modern built form of a large scale. The existing building uses include industrial, commercial and residential with buildings ranging from 1 to 22 storeys. To the east of the Site lies the ExCel Centre with a notably large footprint and more dense development to the west of the Site where modern hotel and residential accommodation has been constructed. To the north and south, the remnants of the historic dock yard are situated with the grade II listed Warehouses K and W to the north and cranes to the south along the waterfront.

Further to the north, the Railway and Victoria Dock Road serve as a hard barrier between the immediate townscape and the low scale mid-20<sup>th</sup> century development beyond in Silvertown.

Western Gateway is the closest street to the Site and is a secondary street lined with bulky and robust historic warehouse structures on both sides towards the eastern end. From a public realm perspective, the area is not particularly accessible with rail lines and large roads to the north. Most footpaths are designed to lead pedestrians solely to the ExCel Centre and there is little green space overall.

There are a number of large footprint modern buildings to the north and west, which have residential, and hotel uses. These larger buildings tend to be higher rise. The most prominent include the modern residential development along ExCel Marina, which features a group of buildings ranging from 7-19 storeys and the under construction Western Gateway Phased Development. This building group includes two 14 storey blocks and a taller element of 22 storeys.

### ***Heritage Assets***

The Site is within close proximity to a number of grade II listed buildings. To the immediate north of the Site lies Warehouse K and W. Warehouse K is one of the original Tobacco Warehouses Constructed from 1850-55 while Warehouse W was constructed later in the 1860's. Warehouse S, to the west of K, retains its façade however was reconstructed internally to accommodate a hotel and residential use and is not listed. The listed buildings are constructed in stock brick with hipped slate roofs and



segmented arch windows. Internally, they retain large open floor areas and aspects of their original structure. Their significance is derived from their architectural and historic interest as they have retained original features and are the last remaining Victorian warehouses of the Royal Victoria Dock. They also derive group value from their proximity, use and age.

Our assessment is that the setting of Warehouse K and W is considered to contribute very little to their significance due to the redevelopment of the surrounding area. The historic setting of the buildings, in close proximity to warehouse structures of a similar use and style, has been largely lost including their relationship to the waterfront, due to the infill of the dock in the 1940's and subsequent closing of the docks in the 1960's. This lack of contribution should be given greater consideration within the site allocation and the subsequent potential for increased capacity of height and volume.

The closing of the docks paved the way for the late 20<sup>th</sup> century and more recent large-scale developments of the ExCel Centre to the east, associated open/landscaped space which now constitutes the Site, and development to the west all of which are not considered to contribute to the setting of the warehouses. However, the relationship between the remaining Victorian buildings and structures is considered to contribute to the significance of the warehouses where they reveal the historic context of the area and is exemplified by their group value.

The grade II listed Stothert and Pitt Cranes to the south of the site range in date from 1920-1962 and are constructed in tubular steel. The Historic England list description sets out the significance of the group of cranes as:

- This is the most concentrated ensemble of cranes surviving in London's Docklands and the group represents the swansong of the docklands as an industrial area in the 1960s, poignantly redolent of this vanished industry;
- Twelve of the cranes are innovative DD2s of 1962, a strikingly modern design in welded tubular steel;
- All fourteen are by Stothert & Pitt, the most famous makers of cranes in the world;
- Both types are impressive in scale and form and the group has an almost sublime quality, particularly in silhouette.

The immediate setting of the cranes to the south along the waterfront is considered to contribute positively to their significance as a direct indication of their use and design within the dockyard. Similarly to the warehouses, the relationship between the remaining Victorian buildings and structures is also considered to contribute to the significance of the assets, where they reveal the historic context of the area, and is exemplified by their group value. However, in other directions their setting is not considered to contribute to their significance due to the infilling of the dock and subsequent modern developments which are at odds with the historic industrial setting of the cranes.

#### ***Emerging Policy set out in Regulation 19 draft Local Plan***

Emerging policy for the Excel Western Entrance allocation includes a height strategy, which sets out that:



- Building heights should range between 21-32m (ca. 7-10 storeys) with a taller building up to 40m (ca. 13 storeys) to the west to add wayfinding and to mark the gateway to the site;
- Massing should step down towards the east of the site to sensitively integrate with the prevailing height of the context and with the heritage assets; and
- Development should conserve and enhance the Grade II listed Warehouse W and the Grade II listed Stothert and Pitt Cranes in the site and the Grade II listed Warehouse K in proximity to the site and their settings.

The heights considered within the site allocation were based on the Characterisation Study and Tall Buildings Annex, which sets out the sensitivities of sites in the area identified areas for growth. Mapping and text include the identification of existing and consented tall buildings within the vicinity, including several which are of up to 22 storeys, “resulting in high densities, making use of waterside views and accessibility”. The Site is shown to sit outside of any viewing corridors, though it is in close proximity to several heritage assets. Positive factors which encourage height on the Site include its connection to the ExCel Centre, its immediate context to the west, and its location within a tall building zone.

The Site is located within Tall Elements Within Constrained Masterplans section of the Tall Building Zones and includes that these sites have a high capacity for growth and can be transformed or enhanced but are affected by external edge conditions such as:

- The proximity to sensitive and/or low rise context; and
- The relationship with an already established tall building cluster in the same area;
- Have been identified as areas that can have a prevailing building datum above 21m and up to 32m.

The Tall Buildings Annex sets out the sieving process undertaken to identify locations for tall buildings. Of the six identified subheadings for the sensitivity screening assessment, the Site only falls under two: Conservation Area, Listed Buildings and Areas of Townscape Value, and Green and water Spaces. Both sections note that where applicable locations for tall buildings will be designated wherever possible at the lower permissible heights, but neither explanation is rigid. With regards to heritage assets in particular notes that these lower heights are necessary in order to protect the significance of conservation areas, listed buildings and non-designated heritage assets. However, within the context of the site allocation, this does not include an assessment of what is significant about the specific asset or it’s the contribution its setting makes to that significance. In addition, with regards to green spaces where taller heights are permissible the design should be carefully considered, and height should step down to avoid overshadowing impact.

Within the suitability scoping assessment, the site is identified within three of the seven subheadings including: Areas with buildings consistently above the tall building threshold, Transform areas and strategic sites and Opportunity Areas. The first subheading details that these areas feature emerging residential developments of 7-10 storeys, establishing a new height datum and areas of consistent



building heights over 21m are considered in principle suitable for tall building developments. Importantly, within the context of the Excel Western Entrance site allocation, this section states that further analysis is required in each location to establish suitable heights and to ensure a coherent townscape and skyline, indicating that there is flexibility in the assessment conclusions.

### ***Consideration of the emerging policy***

While the building heights set out in the N2.SA5 Excel Western Entrance site allocation may sit comfortably within this context, there is insufficient evidence included within the Characterisation Study or the Tall Buildings Annex to preclude other approaches or heights which are based on a more in-depth and bespoke analysis of the Site than these borough wide studies can provide.

In particular, the Characterisation Study and Tall Buildings Annex sets out the prescribed heights range based on the proximity and sensitivity of the green space and heritage assets without consideration or assessment of the setting and significance derived from the setting of heritage assets in the nearby vicinity which may be affected by development on the Site, as the NPPF (2023) requires; and there is inevitably no assessment of the design quality of a proposal on the Site. This is a considerable flaw in the Council's analysis.

Paragraphs 200 and 201 of the NPPF (2023) highlight the importance of significance and any contribution of setting in understanding the potential impact of a proposal on that significance. However, as demonstrated above, the setting of the listed warehouse buildings is considered to contribute very little to their significance and has not been identified or explained within the reasoning for the site allocation, demonstrating a contradiction to the existing approach.

In these circumstances, the weight that can be placed on the proposed maximum height of 40m is very limited. It is likely that alternative approaches to height, volume and building form, could be equally or more appropriate in the context of townscape views and the setting/significance of heritage assets, and the emerging policy should be formulated to allow testing of such alternative approaches and site specific analysis.

Following our review of the emerging policy as set out in the Excel Western Entrance allocation, it is considered that the tallest element of the development should be based on principles that it:

- Is sensitive in terms of scale and form in relation to the settings/significance of heritage assets.
- Integrates with and enhances the proposed public realm.
- Has a height and proportion which allows it to successfully act as gateway and way finder, notwithstanding that the overall effect of this massing remains subservient to the prevailing tall building heights along Western Gateway which are in an area of less sensitivity (ExCel Marina, Western Gateway Phased Development), but still be considered part of the emerging tall buildings along the waterfront.

Review of the emerging proposed design, in response to these principles, indicates that height should not be restricted to the height of 40m included in the site allocation.



The greater height proposed within early design studies has the potential to create a more elegant taller element within the Site boundary that, in the context of the prevailing building heights along Western Gateway (shoulder height between 7-13 storeys, taller buildings up to 22 storeys) will ensure that the building can successfully act as a gateway and wayfinding building in this location. It is important to note that the building heights proposed in the site allocation may not achieve this design principle due to the now established larger building heights to the immediate west.

The listed Warehouse K and W are currently experienced in kinetic views along Western Gateway, with tall buildings within their immediate and wider vicinity, including those to the immediate west. The taller massing considered by HTA would step back and away from Western Gateway and the listed buildings to ensure that it would not compete with the historic frontages and immediate settings of the listed buildings. The setting of Warehouse K and W is already defined in part by tall buildings that make a negligible impact upon their significance. The redevelopment of the Site would allow the potential to positively contribute to the setting of Warehouse K and W, in addition to the setting of the adjacent cranes within the vicinity of the Site through a high-quality development which activates and improves upon the existing open space and edges, particularly along Western Gateway.

As mentioned in the overview section of this note, this area of the former Royal Victoria Docks was once dense with large scale warehouses, even after the infilling of much of the dock and replacement with modern buildings in the mid-20<sup>th</sup> century. In this way, the layout and scale of the adjacent buildings within the site boundary could reinstate a more historic layout. In particular, the addition of a lower rise building to the north could result in a positive addition to the townscape which has the potential to enhance the setting of the Grade II listed Warehouses. In addition, the HTA design approach has the potential to improve the existing green space and increase permeability through the Site by introducing more active frontages along the waterfront, Western Gateway and the entrance to the ExCel Centre to the east.

The proposed tallest elements of the emerging proposals would be located to the southwest along the waterfront and would therefore mark the proposed new gateway to the Site. This is in line with the proposed location of a tall building within the N2.SA5 Excel Western Entrance site allocation. The lower elements of the proposal could be located toward the designated heritage assets, ensuring that their sensitive context is preserved and or enhanced. The emerging policy does not include any comparable assessment in setting its arbitrary cap on height at 40m.

### **Conclusion**

TTC's assessment is that the N2.SA5 Excel Western Entrance site allocation, which includes the Site and encompasses the broad principles set out in LBN's evidence base 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 allocation. A taller building could result in a more elegant form and better integrate with the immediate and surrounding context, as early design studies undertaken by HTA suggest. This approach has the potential to ensure that the tallest building can successfully act as a way finder and gateway, optimise the use of the site, and contribute positively to the setting and significance of nearby heritage assets.



The emerging policy should therefore be reviewed and updated to accommodate more appropriate building heights (21-40m (ca. 13 storeys) with taller buildings up to 60m (ca. 19 storeys) as set out in this note.

The Townscape Consultancy, 17.09.24.