

Topic Paper

Tall Buildings

July 2025

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INTRODUCTION

1 Introduction

- 1.1
- This topic paper has been prepared in response to representations on policy D4 (Tall Buildings) in the Newham Draft Submission Local Plan. These comments were received in response to Newham’s Regulation 19 consultation, which was held between July and September 2024.
- 1.2
- The purpose of this topic paper is to demonstrate how policy D4 (Tall buildings) has been developed and evidenced, how it responds to regional and national planning requirements and to clarify the Council’s position in relation to areas of concerns raised in response to the Regulation 19 consultation.
- 1.3
- The key issues raised in response to the Regulation 19 consultation are listed below and can be found in the Regulation 19 Consultation Report:

Definition of tall buildings

- Developers, Aston Mansfield and THESET LTD, proposed setting a higher benchmark or more than one tall building definition in relation to different contexts in the borough.

Flexibility - Greater heights

- A number of developers considered the proposed prevailing heights and maximum heights permissible too restrictive and requested either the removal of maximum height parameters and/or to have greater prevailing heights and/or maximum heights.
- The GLA and some developers suggested using the term ‘appropriate height’ rather than maximum height, to allow some flexibility.
- Some developers, AIM Land Ltd, Ballymore and GLP (International Business Park, Rick Roberts Way), also proposed allowing more flexibility for tall buildings outside of tall building zones.
- Some developers raised concerns about the methodology used to identify suitable locations for tall buildings and to mandate these heights and zones.

Consistency between permitted heights and proposed heights

- A number of developers objected to inconsistencies between consented schemes and proposed maximum heights.

Airport constraints

- London City Airport provided height limit thresholds and suggested that additional detailed safeguarding requirements for neighbourhoods and corresponding tall building zones, which are constrained by the London City Airport safeguarding limitation, should be added to the Plan.
- The Royal Docks Team objected to the policy approach of defining different maximum building heights on sites constrained by the London City Airport safeguarding limitation, suggesting that heights parameters should just reflect the maximum possible within the airport safeguarding limits.

Support for industrial intensification

- Developers, AIM Land Ltd, GLP (International Business Park, Rick Roberts Way), and others with an interest in industrial land in the Borough requested a reconsideration of the approach to tall building zones in the context of the London Plan and Local Plan industrial intensification objectives.

Impact on conservation areas and heritage assets

- Historic England supported the changes made to Policy D4 in the Regulation 19 Local Plan with regard to better referencing heritage considerations to avoid the impact tall building developments could have on conservation areas and heritage assets. However, Historic England continued to object to the robustness of the evidence base supporting Policy D4 and site allocations within Stratford and Maryland Neighbourhood.

Impact on watercourses, open spaces and microclimate

- The Environment Agency raised concerns about an inconsistent approach to tall building zones in proximity to waterspaces.

- 1.4
- Key issues raised during the Regulation 19 consultation have been reviewed to determine if changes to the Draft Submission Local Plan could usefully address some of the issues raised. The assessment led to some modifications to policy D4 (Tall Buildings) Table 1: Tall buildings to ensure the plan is comprehensive and easy to read, referencing airport safeguarding limitations in all the tall building zones that are within the neighbourhoods constrained by the London City Airport safeguarding limitation. These have been included in the Submission Local Plan and are also agreed by London City Airport, as set out in the Statement of Common Ground.
- 1.5
- In addition, following Duty to Cooperate discussions with the Environment Agency, a number of changes have been made. This wording is to ensure the plan consistently references all riverside tall buildings zones in the tall building guidance. Modifications are also made to ensure consistency with GWS2’s terminology. These modifications have been agreed through the Statement of Common Ground with the Environment Agency.
- 1.6
- This paper will focus on the key issues that have not been resolved through modifications and statements of common ground. This paper sets out the following:

- Policy context
- Evidence base
- Key issues
- Conclusions

POLICY CONTEXT

2 Policy Context

21 This section outlines the legislative and national planning requirements that have informed the preparation of policy D4 (Tall Buildings).

National Planning Policy Framework (December 2023)

- 22 The National Planning Policy Framework (NPPF) (December 2023) doesn’t have specific guidance on tall buildings, but it emphasises the importance of well-designed buildings that contribute positively to the urban environment and local character, while also promoting sustainable development and meeting housing needs.
- 23 Chapter 11 of the NPPF - Making effective use of land - promotes effective use of land for meeting housing needs with a focus on developments on brownfield land, while securing well-designed and healthy places.
- 24 Chapter 12 of the NPPF - Achieving well-designed and beautiful places – promotes a high-quality and sustainable built environment and expects Local Authorities to set out clear expectations of design.

London Plan (2021)

- 25 London Plan (2021) policy D9 (Tall buildings) requires boroughs to identify locations where tall buildings may be an appropriate form of development in order to optimise the use of land and meet the housing needs.
- 26 Policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities. Policy D9 part B requires boroughs to identify if there are suitable locations for tall building development. Policy D9 part B (2) states: “Any such locations and appropriate tall building heights should be identified on maps in Development Plans.” The supporting text 3.9.2 (2) states “in these locations, determine the maximum height that could be acceptable” and supporting text 3.9.2 (3) continues with “identify these locations and heights on maps in Development Plans.”
- 27 Policy D9 part C sets out a comprehensive list of criteria tall buildings should meet – under the following headings: visual, functional, environmental and cumulative impacts – to make sure that tall buildings play a positive role in shaping the character of an area.
- 28 Policy D3 (Optimising site capacity through the design-led approach) of the London Plan seeks to optimise site capacity through a design-led approach promoting the “most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”.

EVIDENCE BASE

3 Evidence Base

- 31 This section outlines the evidence base documents and the guidance documents that have informed the preparation of policy D4 (Tall buildings).
- 32 The sources used to inform the development of this policy include:
- Newham Characterisation Study (2024)
 - Tall Building Annex (2024)
 - Characterisation and Growth Strategy (2023)
 - Optimising Site Capacity: A Design-led Approach (2023)
 - Site Allocation and Housing Trajectory Methodology Note (2024)
 - Industrial Land and Uses LPG (2023)
- 33 The Newham Characterisation Study (2024) was developed as an evidence base to support the review of Newham Local Plan. An initial version was undertaken in 2022 by Maccreanor Lavington with New Practice, Avison Young and GHPA, and it was updated in 2024 by the London Borough of Newham, following the Regulation 18 consultation.
- 34 The study identifies the overarching character of the borough, including historic character, and informs the Submission Local Plan spatial strategy and design policies and provides guidance on how these policies should be implemented. It also provided the basis for design-led capacity testing of site allocations to inform the Local Plan’s housing trajectory.
- 35 The study has been developed in general accordance with the requirements of the Characterisation and Growth Strategy London Plan Guidance (2023). In relation to tall buildings, the Characterisation and Growth Strategy LPG (2023) lays out the process to determining if and where tall buildings may be an appropriate form of development. The guidance suggests the following steps:
- Step one: Sensitivity screening assessment
 - Step two: Alignment with area-wide aspirations
 - Step three: Suitability scoping exercise
 - Step four: Define locations and heights
- 36 Following representations to Regulation 18 consultations, which raised concerns about the robustness of the evidence base supporting policy D4 (Tall Buildings), Newham’s Characterisation Study (2024) has been updated and supplemented with a Tall Building Annex (2024).
- 37 The Tall Building Annex (2024) has been prepared to provide a more detailed explanation of the sieving exercise that was undertaken to identify locations where tall buildings may be an appropriate form of development, in line with the steps set out in the Characterisation and Growth Strategy London Plan Guidance (2023).

KEY ISSUES

- 38
- Policy D4 (Tall buildings) provides an overarching borough-wide strategy. The preparation of the policy was developed alongside the design-led capacity testing of the 45 site allocations identified in the Plan. The assessment of these sites, which was undertaken by Maccreanor Lavington as part of developing the Newham Characterisation Study, followed a design-led approach. This was to ensure that the estimated capacity was based on the most appropriate building form and scale to optimise the use of land, based on an evaluation of the existing context, in line with Policy D3 and London Plan Guidance (LPG) Optimising site capacity: A design-led approach (2023). A detailed break-down of the steps followed for the design-led capacity testing of the sites can be found in section 3 ‘Site capacity testing’ of the Site Allocation and Housing Trajectory Methodology Note (2025).
- 39
- The Industrial Land and Uses LPG (2023) has been consulted as guidance to further understand industrial typologies and their heights and to ensure the deliverability of industrial intensification in tall building zones.

4 Key Issues

- 41
- Comments on policy D4 (Tall buildings) and in relation to building heights on relevant site allocations were received in response to Newham’s Regulation 19 consultation. These comments have been processed and reviewed and can be found in Appendix 13 Design Comments of the Regulation 19 Consultation report.
- 42
- Having reviewed these comments, the Council has identified the key issues raised by consultees and listed in paragraph 1.3. For clarity and explanatory reasons, the Flexibility- Greater heights issue has been subdivided into a number of sub-issues: Flexibility within tall building zones; Flexibility outside tall building zones; Objections to the tall buildings evidence base; Changes from the Draft Local Plan (Regulation 18) to the Draft Submission Local Plan (Regulation 19).

The detailed key issues referred to in this topic paper are therefore listed below:

- Definition of tall buildings
 - Flexibility within tall building zones
 - Flexibility outside tall building zones
 - Objections to the tall buildings evidence base
 - Consistency between permitted heights and proposed heights
 - Support for industrial intensification
 - Impact on conservation area and heritage assets
 - Changes from the Draft Local Plan (Regulation 18) to the Draft Submission Local Plan (Regulation 19).
- 43
- This section draws together the key elements of the evidence base which justify and demonstrate the deliverability and conformity of the policy approach, in relation to these key issues. It will therefore address the concerns raised and demonstrate the soundness of the policy approach.
- 44
- For each of the key issues, this section provides an introductory paragraph which summarises the objections to the Policy, the justification behind the approach with reference to key evidence base documents and a conclusion paragraph. Images and tables have been incorporated, where necessary, to support and illustrate the paper.

Key Issues

DEFINITION OF TALL BUILDINGS

Introduction:

A few developers proposed setting a higher benchmark or more than one tall building definition in relation to areas of different character within the borough. Aston Mansfield requested that as inner London borough, Newham should set a definition of tall building higher than the London Plan’s definition, to enable a more efficient use of land across the borough. THESET LTD suggested that tall buildings outside tall building zones should be defined as those that are at or over 21m, while areas in Stratford should have a benchmark that is taller than 21m in order to recognise the emerging tall building context. Some developers objected to the use of storeys to illustrate height, arguing that different land uses could require different floor-to-floor heights and could therefore result in a different number of storeys.

This section sets out:

- the London Plan definition of a tall building
- the Local Plan definition of a tall building
- the justification for the Local Plan threshold
- the benefit of using the number of storeys to illustrate height.

1 Definition of tall buildings

- 1.1
- London Plan policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities. The London Plan states that a tall building “should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.”
- 1.2
- In the context of residential buildings, the assumption of a typical floor-to-floor level is 3m. A tall building, based on the London Plan definition, will result in the total height of 21m from ground to the top of the building. This is illustrated in Fig. 1.
- 1.3
- This interpretation of London Plan Policy D9 has been confirmed by the Greater London Authority (GLA) during the plan preparation, and it is also confirmed by the footnote 4 in the Characterisation and Growth Strategy LPG (2023), which states “This figure of 21m assumes a floor-to-ceiling height of 3 metres for the uppermost storey, and is equivalent to the London Plan definition of 18m from ground level to floor level of the uppermost storey.”
- 1.4
- London Plan paragraph 3.9.3 requires boroughs to define what a tall building is for specific localities and states that “tall buildings are generally those that are substantially taller than their surrounding and cause a significant change to the skyline”.
- 1.5
- The Characterisation and Growth Strategy LPG (2023) gives more guidance to boroughs on how to identify an appropriate local definition of a tall building for their area based on an analysis of building heights across the borough. Paragraph 2.4.1 states “Where there are areas or clusters of existing tall buildings within a borough, the height of these buildings should not be considered in isolation from the height of the wider area when considering what height is ‘substantially taller than its surroundings’. This is because these buildings are already considered tall, and basing a

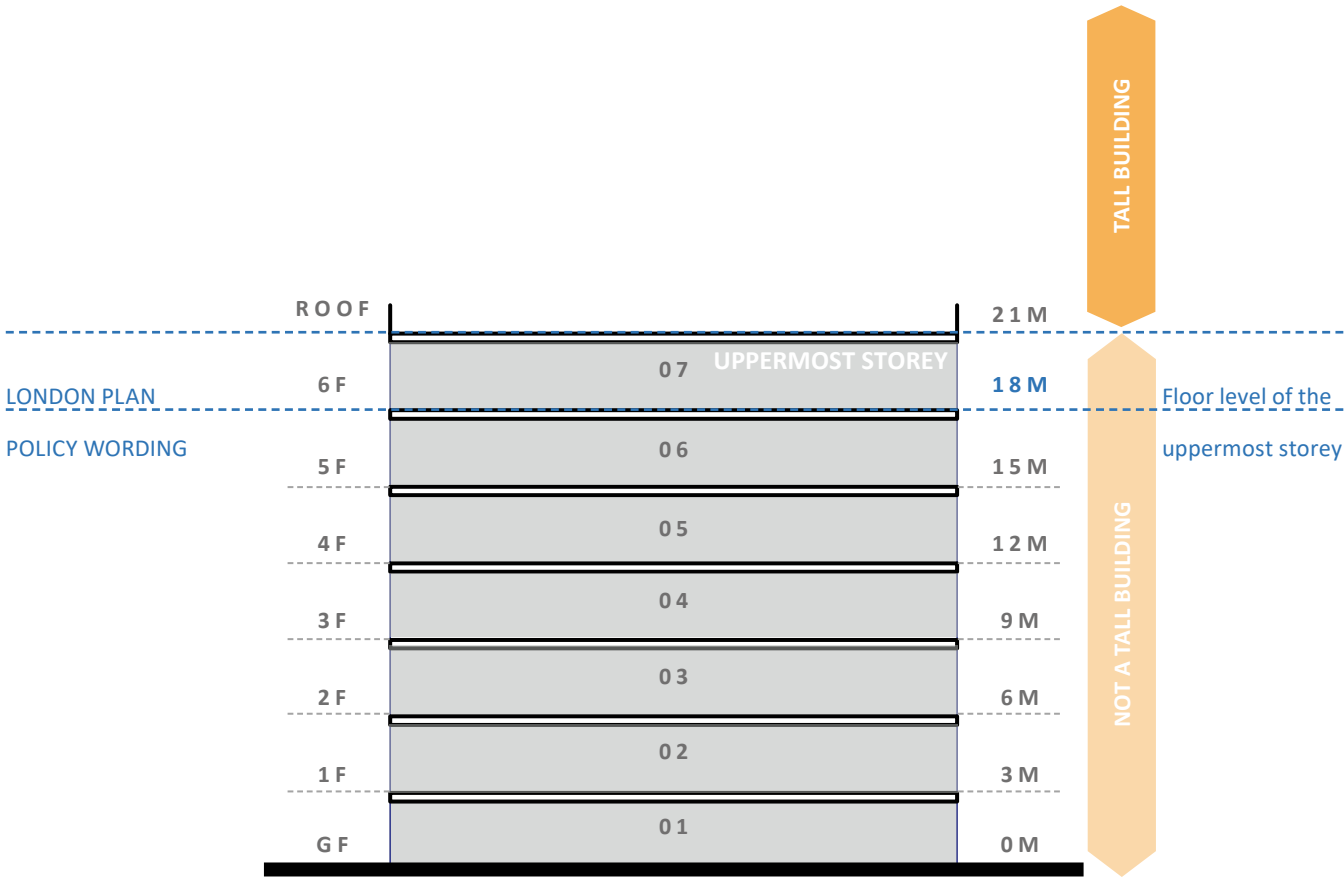


Fig 1 London Plan definition

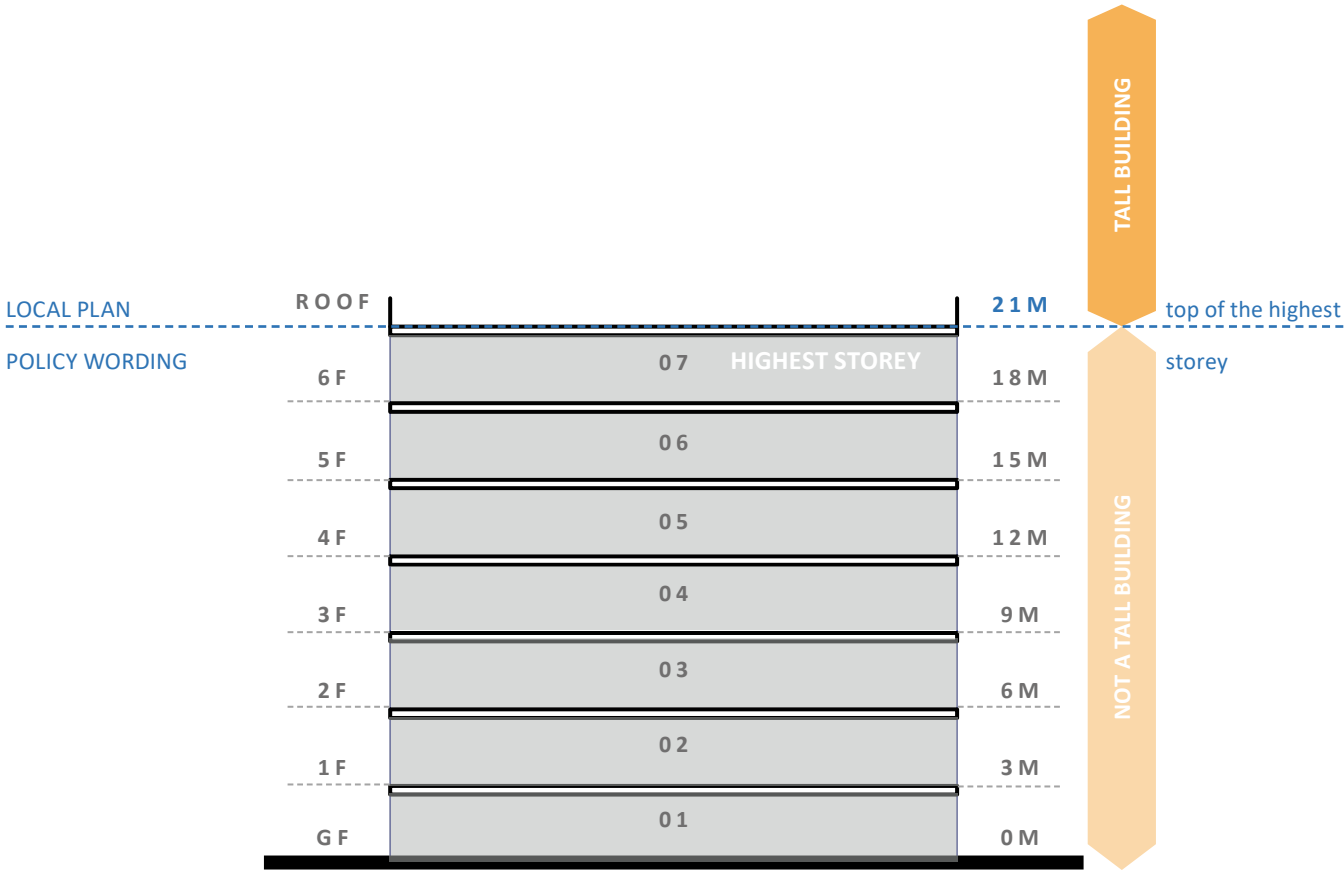


Fig 2 Local Plan definition

definition solely on what is considered tall in relation to them would result in an inappropriately high definition.”

1.6 The Council’s analysis of existing building heights is shown in Fig. 3 of the Tall Building Annex, also shown in Fig. 3 of this topic paper. The map highlights the varying character of building heights in the borough through different height parameters as set out in Table 1 below:

Table 1 Newham existing building heights

Height	Range
Prevailing height of the area	0-10 m (ca.0-3 storeys)
	10-21 m (ca.4-6 storeys)
	21-32 m (ca. 7-10 storeys)
Height of taller elements integrated within blocks	up to 32 m (ca.10 storeys)
	up to 40 m (ca. 13 storeys)
Buildings substantially taller than the context	21-32 m (ca. 7-10 storeys)
	33-40 m (ca. 11-13 storeys)
	41-50 m (ca. 14-16 storeys)
	51-60 m (ca. 17-21 storeys)
	61-100 m (ca. 21-33 storeys)
	100m + (ca. 33 storey)

1.7 The analysis shows that:

- the majority of the Borough is characterised by terraced or semi-detached houses with a prevailing height up to 10m (ca. 3 storeys);
- In the Olympic Legacy Opportunity Area and Royal Docks and Beckton Riverside Opportunity Area buildings are substantially taller than their context. However even in these areas heights vary significantly: tall buildings range from 30m to 100m and are not concentrated in single clusters but scattered across these areas within a range of contexts, with prevailing heights ranging between 10-21m and 21-32m.

1.8 The analysis recognises the existence of tall buildings that are substantially taller than the context, especially in the Stratford and Maryland Neighbourhood. However, when defining what should be considered a tall building in Newham, the Council, in accordance with the Characterisation and Growth Strategy LPG (2023), considers that these tall buildings have emerged in a wider context, that is still mainly characterised by low-rise and mid-rise development.

1.9 Considering that the residential buildings that have emerged around the Olympic Legacy Opportunity Area and Royal Docks and Beckton Riverside Opportunity Area have established a new height datum, between 21-32m in prevailing height, the Council considered that 21m was the appropriate threshold to set the height at which buildings started changing the skyline across the borough.

1.10 Based on the considerations set out above, it was concluded that the London Plan definition of a tall building is appropriate for Newham. Newham has therefore defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than their surroundings. The borough-wide

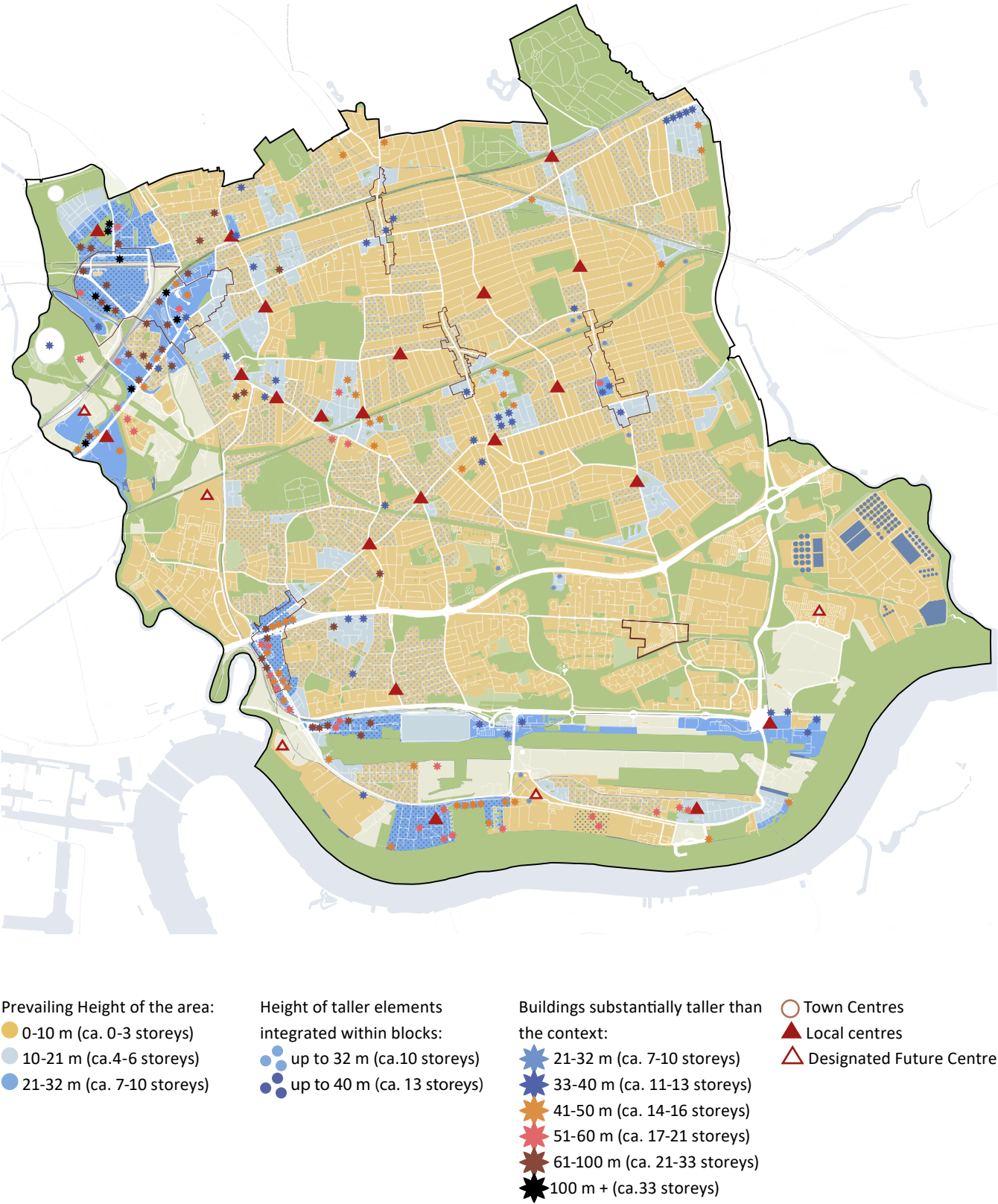


Fig 3 Newham existing building heights

definition of tall buildings in Newham is based upon prevailing heights across the borough rather than the height of the tallest existing element in specific areas. This approach is considered to be in conformity with paragraph 2.4.1 of the Characterisation and Growth Strategy LPG (2023) outlined in paragraph 1.5 of this paper.

- 1.11
- This approach is then supported by the inclusion of 22 tall building zones, which have their own height requirements, recognising the setting and character of different parts of the borough and reflecting the borough-wide spatial strategy and hierarchy set out in the tall building strategy. The borough-wide spatial strategy is outlined in detail in the ‘Tall building spatial hierarchy section’ of the Tall Building Annex (2024).
- 1.12
- It is considered that this borough wide definition combined with the inclusion of 22 Tall Building Zones, strikes the correct balance between enabling delivery which optimises the use of land and ensuring a sustainable strategy which protects townscapes and directs tall buildings to the most suitable locations. The Council considers that the suggestion from THESET LTD that areas in Stratford should have a benchmark that is taller than 21m threshold is already addressed through the tall building strategy which has identified TBZ19: Stratford Central as the area of maximum height in the Borough to recognise its emerging context, its Metropolitan Centre nature and its capacity for growth, with opportunities for tall elements up to 60m and 100m and prevailing height between 21m and 32m (ca. 7-10 storeys).
- 1.13
- Policy D4.1 sets out the definition of tall buildings in Newham. The definition of tall buildings in Newham is as follows, and it is illustrated in Fig. 2.

D4.1. Tall buildings in Newham are defined as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements).
- 1.14
- The GLA is supportive of our methodology and definition of tall buildings, which meets the requirements of Policy D9 part A.
- 1.15
- In relation to the use of storeys and their inaccuracy when referring to buildings other than residential buildings, implementation text D4.1 is clear that the definition of tall buildings in Newham covers all buildings of 21m, irrespective of use and related floor-to-floor height. However, for explanatory purposes only, we consider it useful to provide an estimate of the number of storeys that could be achieved. In the context of residential buildings, the assumption of a typical floor-to-floor level is 3m, in line with the GLA assumption outlined in paragraph 1.3 of this section.

Conclusion:

- 1.16
- Based on the evidence highlighted in this section, the conclusion is that Newham’s definition of tall building is positively prepared and justified. The definition of a tall building, set at 21m, is:

In line with London Plan definition of a tall building;

Based on local evidence which reflects the predominantly low-rise, mid-rise character of the majority of the borough;

Enables delivery by being complemented by the inclusion of 22 Tall Building Zones, which cover significant areas of transformation and growth and which set their own height requirements which reflect local contexts.

Introduction:

Developers considered the proposed prevailing heights and maximum heights permissible too restrictive and requested either the removal of maximum height parameters and/or the provision for greater prevailing heights and/or maximum heights. The GLA and a few developers suggested using the term ‘appropriate/indicative height’ rather than maximum height to allow for some flexibility. The Royal Docks Team suggested that height parameters should reflect the maximum possible within the airport safeguarding limits.

This section sets out:

- The justification for ‘maximum heights’.

The justification for ‘prevailing heights’.

2 Maximum versus appropriate/indicative heights

- 21
- London Plan policy D9 part A requires boroughs to identify in their development plan what is considered a tall building for their specific localities. Policy D9 part B requires boroughs to identify if there are suitable locations for tall building developments. Policy D9 part B (2) states: “Any such locations and appropriate tall building heights should be identified on maps in Development Plans.” The supporting text 3.9.2 (2) states “in these locations, determine the maximum height that could be acceptable”.
- 22
- The need to determine the maximum height is confirmed in the Characterisation and Growth Strategy LPG (2023), which gives more guidance on how to identify suitable locations for tall buildings developments and their appropriate heights. The document suggests that appropriate heights should be expressed as maximums to provide greater clarity at the planning application stage. See extracted texts below:

4.4.12 Once locations where tall buildings may be appropriate have been identified, the appropriate heights for these locations, likely to be expressed as maximums, should be determined and identified on the Policies Map and within a DPD. [...]

[...] setting maximum heights is considered preferable, as this will provide greater clarity at the planning application stage. [...]

23

The Council considers that the evidence supporting Newham’s Submission Local Plan is sufficiently robust. This is comprised of the Newham Characterisation Study (2024) and Tall Building Annex (2024), which have been developed in line with the Characterisation and Growth Strategy LPG (2023). Following the London Plan Guidance, Newham’s Submission Local Plan has identified locations that could be appropriate for tall buildings and identified the maximum heights that could be acceptable in each area.

24

Policy D4 (Tall buildings) and the supporting evidence were supported by the Greater London Authority in their representation to the Regulation 18 consultation which states: “The Mayor welcomes that the draft policy meets the requirements of London Plan Policy D9 in terms of having

a clear definition that applies across the whole borough (21m), mapping tall buildings locations clearly, and identifying appropriate heights for the tall building locations.” [Reg18-E-093/027].

- 25 However, in their response to Newham’s Regulation 19 consultation, the Greater London Authority has suggested a more flexible approach, suggesting using the term ‘appropriate height’ rather than maximum height. “The draft Plan also meets the requirements of Policy D9B. LBN should note that Policy D9 specifically uses the term ‘appropriate building heights’. This implies some flexibility which could include a range of ‘appropriate building heights’. This is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone, if that is indeed what the borough wishes to do.

Maximum building heights could be helpful in situations where an absolute is required and necessary. For instance, to prevent the development of tall buildings from obstructing one of London’s strategic views, as set out in the London View Management Framework (LVMF), or where maximum building heights have been set by the Civil Aviation Authority. Where the draft Plan uses the term ‘maximum’ building heights the term ‘appropriate’ building heights should be used instead, in accordance with the advice set out above.” [Reg19-E-015/022]

This shift in position has been a theme of discussion at the Duty to Cooperate meeting, and it has remained an area of disagreement.

- 26 In relation to the Greater London Authority’s suggestion to use indicative heights in order to enable varying building heights within a tall building zone, the Council considers that the proposed tall building strategy already addresses this. The range of building heights, illustrated in the policy map and in Table 1, has already taken into consideration the practical arrangements of taller and lower buildings within each Tall Building Zone. The proposed varying heights within the tall buildings zone allow for transitioning heights from the tallest element to the surrounding context and sensitive areas, whether a low-rise context or an historic asset.
- 27 In relation to the suggestion made by the Greater London Authority and the Royal Docks Team, of aligning height parameters with the maximum heights set by the Civil Aviation Authority, the Council considers that referencing height limits threshold for airport safeguarding analysis could lead to misinterpretation for the following reasons:
- London City Airport safeguarding limit depicts a threshold for airport safeguarding analysis and doesn’t necessary reflect the most appropriate height for a site;
 - safeguarding zones are subject to change, which means that including them might make the policy out of date.
- 28 An analysis of other boroughs’ approaches to the definition of height parameters in the Local Plan making process has highlighted inconsistencies in the Greater London Authority’s interpretation of Policy D9 of the London Plan (2021). A few examples are below:
- The London Borough of Wandsworth Local Plan (July 2024) uses the word ‘appropriate heights’ for each tall building zone in policy LP4 Tall and Mid-rise Buildings and in the maps in Appendix 2. However, in response to the Wandsworth Regulation 18 Local Plan, the GLA suggested that the London Borough of Wandsworth should set ‘maximum heights’ “in order to create certainty for the LPA and developers, as set out within policy D9 part B.2.” This is evidenced in the Duty to Co-operate statement 2.b ‘Built & historic environment, including tall buildings’ (2022).
 - The London Borough of Lewisham Submission Local Plan (January 2023) uses the word ‘maximum height’ and in the Response to Inspectors’ Matters, Issues and Questions Matter 10 – High Quality Design and Heritage document, it states that the policy and its supporting evidence are supported by the Greater London Authority. The GLA response to the Lewisham Regulation 19 Local Plan, states that Part C of Policy QD4 “lists what are considered to be appropriate

heights in specific tall building locations, thus meeting the requirements of London Plan Policy D9, part B (2).”

Conclusion:

- 29 Based on the evidence highlighted in this section, the conclusion is that the use of ‘maximum’ height parameters is justified and is in line with:

- London Plan Policy D9 requirements;
- Characterisation and Growth Strategy London Plan Guidance (2023).

3 Prevailing height parameters

- 31 Some developers have objected to the inclusion of prevailing height parameters in tall building zones and relevant site allocations, expressing their concern about limiting flexibility. This section sets out the justification for the introduction of the prevailing height parameter and how the ranges of heights have been identified.
- 32 London Plan policy D9 (Tall buildings) requires Local Authorities to identify suitable locations for tall building developments and to show them in the development plan.
- 33 The Characterisation and Growth Strategy LPG (2023) lays out the process to determine if and where tall buildings may be an appropriate form of development. Paragraph 4.4.6 of the document highlights the importance of mid-rise developments to deliver high-density schemes and to offer a mix of typologies within a neighbourhood. See text below:
- 4.4.6 Mid-rise developments can often offer an optimum design solution for delivering higher-density development in both areas where tall buildings are and are not appropriate. Mid-rise developments may also provide better opportunities for different households – for example, children and young people’s access to suitable play and amenity space.
- 34 In line with London Plan policy D9 (Tall buildings), the Submission Local Plan policy D4 (Tall buildings) identifies zones where tall building developments might be an appropriate form of development. Designated tall building zones are identified in the policies map, which is available as an [interactive map](#) on the Council website. The tall building map is shown in Fig 4.
- 35 The Tall Building Zones Map, shown in Fig 4, identifies two categories of building height parameters:
- Maximum height
 - Prevailing height

Maximum height represents the maximum permissible height at which tall buildings could be built within the tall building boundary.

Prevailing height represents the scale at which most of the buildings should be built within identified tall building zones and from which taller elements, up to the maximum height parameter, could emerge.

- 36 As highlighted in Fig. 3 of the Tall Building Annex (also shown in Fig. 3 of this document) the majority of the borough is characterised by terraced houses or semi-detached houses with a prevailing height up to 10 m (ca. 3 storeys). A few parts of the borough have buildings ranging between 10-21m (ca. 4-6 storeys). Residential developments with buildings between 21-32 m (ca. 7-10 storeys) have emerged around the Olympic Legacy Opportunity Area and Royal Docks and

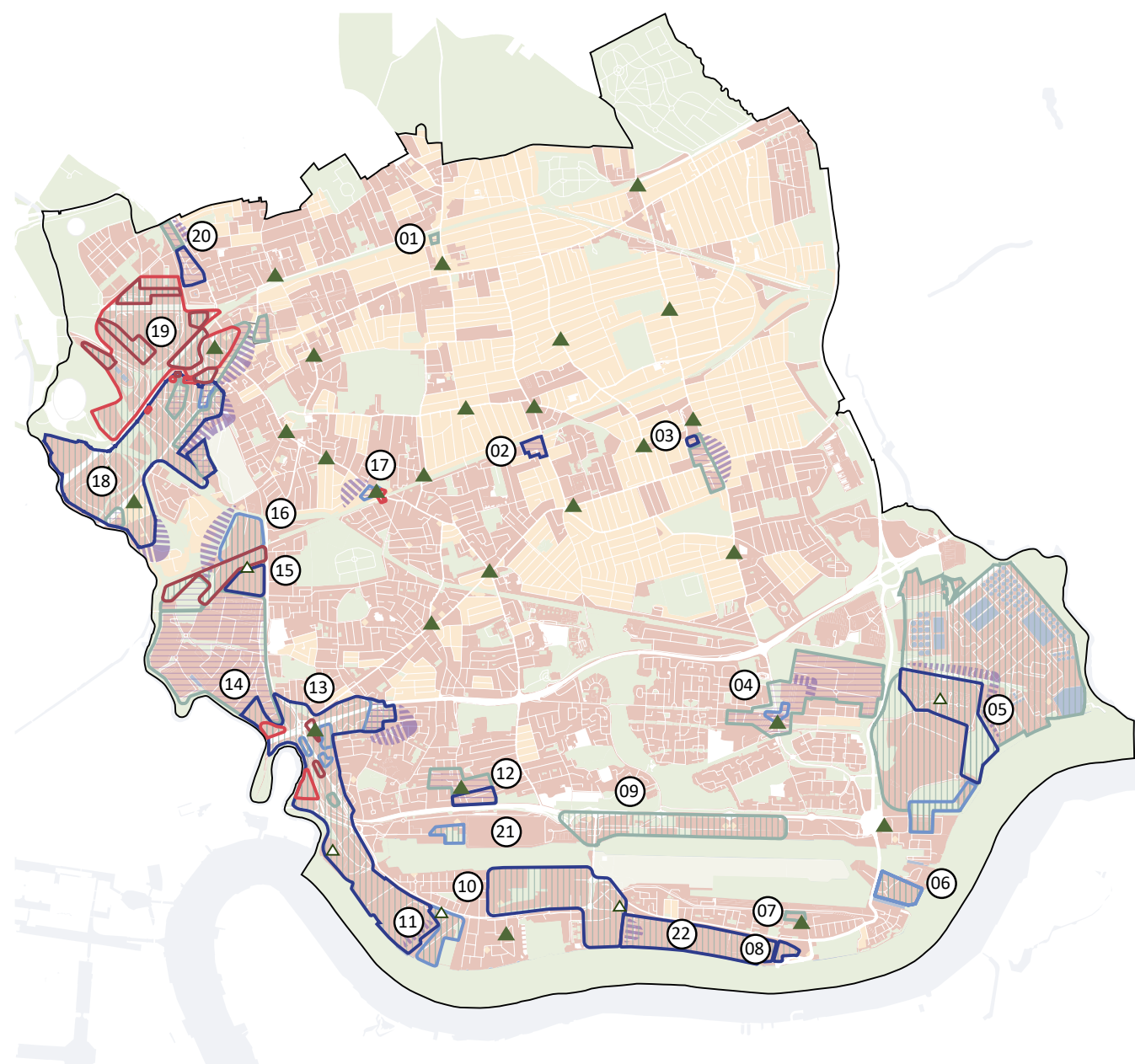


Fig 4 Tall Building Zones map

- Tall Building Zone up to 32 m
- Tall Building Zone up to 40 m
- Tall Building Zone up to 50 m
- Tall Building Zone up to 60 m
- Tall Building Zone up to 100 m
- ▨ Main building datum above 9m but below 21 m (ca. 4-6 storeys)
- ▨ Main building datum above 21m but below 32 m (ca. 7-10 storeys)
- Sensitive context
- Non sensitive context
- ▨ Sensitive edge
- ▲ Town centre
- ▲ Designated Future Centre

- TBZ1: Forest Gate
- TBZ2: Green Street
- TBZ3: East Ham
- TBZ4: Beckton
- TBZ5: Gallions Reach
- TBZ6: Albert Island
- TBZ7: King George V/Pier Parade
- TBZ8: Store Road/Pier Road
- TBZ9: Royal Albert North
- TBZ10: North Woolwich Road
- TBZ11: Lyle Park West
- TBZ12: Custom House
- TBZ13: Canning Town
- TBZ14: Manor Road
- TBZ15: West Ham Station
- TBZ16: Abbey Mills
- TBZ17: Plaistow Station
- TBZ18: Stratford High Street
- TBZ19: Stratford Central
- TBZ20: Chobham Manor / East Village
- TBZ21: Excel West
- TBZ22: Thameside East

Beckton Riverside Opportunity Area, establishing a new height datum in the regenerated areas.

The most common heights in Newham are the following:

- 0-10 m (ca. 0-3 storeys) - below tall building threshold
- 10-21 m (ca.4-6 storeys) - below tall building threshold
- 21-32 m (ca. 7-10 storeys) - above tall building threshold

As shown in Fig. 4 developments within tall building zones are expected to be developed within the following prevailing heights:

- between 9m and 21m or
- between 21 and 32m.

3.7 Newham's tall building strategy has been prepared by experts in the field who have advised the Council on how to best elaborate a tall building strategy that was in line with the requirements of London Plan policy D9 (Tall buildings) and that reflected the findings of the design principles identified in the Newham Characterisation Study (2024), Chapter 9 'Borough Wide Design Principles' which outline how high-density developments should be built in Newham. Most of the tall building developments in the borough are expected to be residential buildings. Residential developments at high density could be developed with a range of typologies - apartment blocks, perimeter blocks and tall buildings. However, the most common typology adopted, especially when developing large scale sites, is the perimeter block. The Newham Characterisation Study (2024), 'Defining Tall Building Zones', p. 168, includes a few examples to illustrate how high density development have been built in Newham. Image 1, shows a tall building integrated into a mid-rise building to provide a transition to the existing context around Maryland Station. Image 2 (Fig. 5) shows a main building datum between 21m and 32m with taller elements above 32m integrated into the scheme at Royal Wharf. The Newham Characterisation Study (2024), Chapter 9 'Borough Wide Design Principles' also makes references to tall buildings as the tallest element in a wider composition. Living well in increased density, page 290 gives the following definition of taller elements: "Taller elements are components of a building that exceed the established shoulder height of the principal urban form. For example, where the corner of a courtyard block apartment building steps up to 8 storeys and the remainder of the building is at 6 storeys. Furthermore, paragraph 9.3.2 'Design and placement of tall buildings', explains how tall buildings should be integrated into urban blocks and how the massing of buildings should transition from low to high through shoulder buildings." An example of a perimeter block with a tall element is shown in Fig. 6 for clarity.

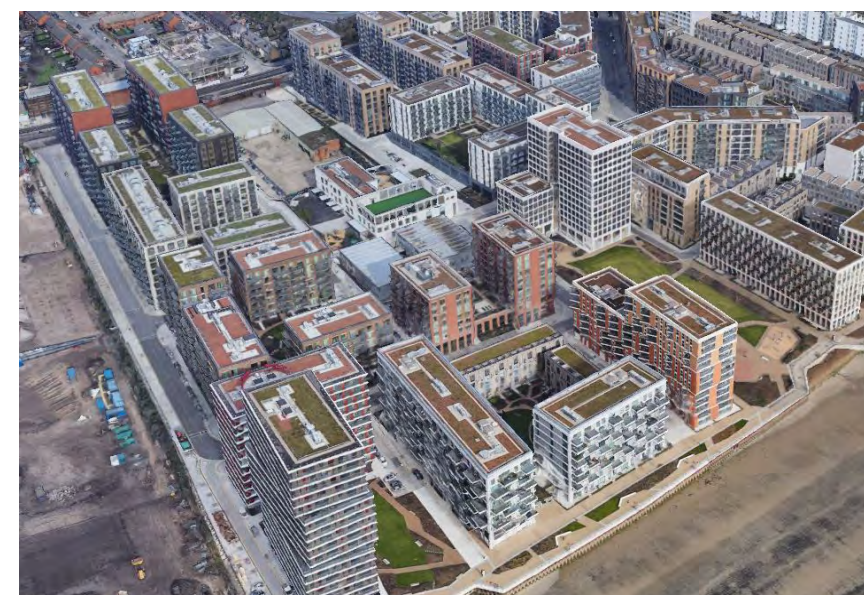


Fig 5 Royal Wharf - image from Characterisation Study

FLEXIBILITY OUTSIDE TALL BUILDING ZONES

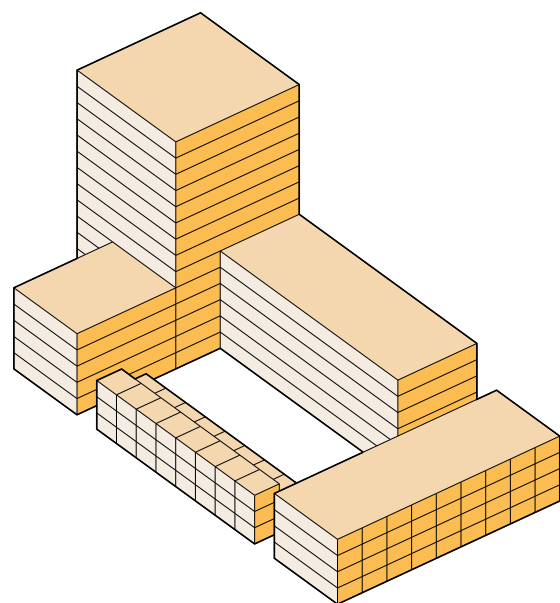


Fig 6 Perimeter block with tall element

Introduction:

A few developers, AIM Land Ltd, Ballymore and GLP (International Business Park, Rick Roberts Way), proposed allowing more policy flexibility to enable tall buildings outside tall building zones and argued that policy D4 (Tall buildings) should be revised to be consistent with the Master Brewer Case, which determined that tall buildings can be developed outside of tall building zones if they meet the tests set out in London Plan Policy D9 part C.

This section sets out:

- The justification for excluding tall buildings outside tall building zones.

4 Flexibility outside tall building zones

- 41 Policy D9 part B in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development. Point 3 clearly states that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”
- 42 Policy D9 part C sets out a comprehensive list of criteria tall buildings should meet – under the following headings: visual, functional, environmental and cumulative impacts – to make sure that tall buildings play a positive role in shaping the character of an area.
- 43 In line with London Plan policy D9 (Tall buildings), policy D4 (Tall buildings) of the Submission Local Plan has identified 22 tall building zones that are considered suitable for tall building developments. Implementation text D4.2 clarifies that “Development of tall buildings outside of the Tall Building Zones will be considered a departure from the plan.” Part 3 of the policy and implementation text D4.3 require tall buildings to meet the visual, functional, environmental and cumulative impact in line with London Plan Policy D9 part C.

What is the Master Brewer Case?

- 44 The Master Brewer Case [London, R (London Borough of Hillingdon) v Mayor of London] is the judicial review in December 2021 that interpreted the application of London Plan policy D9 (Tall buildings). The case centred on a proposed mixed-use development on the Former Master Brewer Site in Hillingdon with buildings up to 11 storeys, which Hillingdon Council refused as contrary to a number of Local Plan policies, London Plan 2016 policies and Intend to publish Draft London Plan Policy D9 and which was granted by The Mayor of London on the basis of public benefit and the general compliance with the development plan, although not in a tall building location.
- 45 The London Borough of Hillingdon sought judicial review of the decision made by the Mayor on 3 grounds. The most relevant ground in relation to tall building policy is ground 1: the interpretation of Policy D9 in the London Plan 2021. Therefore, this section outlines only the relevant aspects of ground 1.

38 Following the design principles and examples set out above, which seek to successfully manage tall building developments in relation to what is generally a low-rise to mid-rise context, the Council considers it to be a justified and positively prepared approach to indicate not only maximum height parameters, as suggested by London Plan guidance, but also the scale at which most of the buildings should be built within identified tall building zones and from which taller buildings could emerge. The Council considers that only identifying areas where developments could be built at the maximum height would have resulted in fewer and smaller tall building designations. Instead, introducing prevailing height parameters allowed the Council to identify more and larger tall building zones and, unless explicitly indicated in the tall building guidance, be more flexible on the location of the tallest element/s within each zone. In conclusion this strategy will:

- Help manage the successful integration of tall buildings in a low-rise, mid-rise context, where proposed prevailing heights will help the transition from the scale and character of the existing context to the proposed tall element.
- Help deliver typologies, such as perimeter blocks, where mid-rise development and taller elements can maximise site capacity while providing a mix of building typologies and homes.

Conclusion:

39 Based on our evidence, as set out above, the Council considers that the introduction of prevailing heights is fundamental to sensitively integrating and managing tall buildings in a borough that is mainly characterised by a low-rise to mid-rise context. The prevailing heights will also help support mid-rise developments, giving the opportunity to deliver high-density schemes and to offer a mix of typologies within a neighbourhood.

- 46 The Master Brewer scheme was assessed against the Hillingdon Local Plan (2012) which was developed before the adoption of the London Plan (2021). Therefore, the Hillingdon development plan didn't comply with the London Plan policy D9 requirements to identify suitable locations for tall buildings. The proposal was therefore assessed against policy DMHB 10 which required tall buildings to be located in Uxbridge or Hayes town centres (i), be located in an area of high public transport accessibility (ii) and be of height, form and massing that are sensitive to the context and don't impact on local views (iii). The Uxbridge and Hayes town centre where the only areas identified as suitable for tall buildings in the strategic policy BE1, based on a townscape assessment. Hillingdon considered the proposal in conflict with the development plan policies, as outside the town centres, in an area with low PTAL and developed with a massing form and height not in line with its wider context characterised by two-three storey buildings.
- 47 The Mayor of London, recognised that the proposal was in a location that was not supported in principle by Local Plan policy DMHB 10 and that it didn't comply with the requirement to identify suitable locations for tall buildings of the Intend to Publish London Plan policy D9 (B). However, the Mayor considered that the scheme accorded overall with the development plan and concluded that the scheme was a good opportunity for the Council to provide affordable homes in an underutilised site, close to an underground station. It considered that the benefits of the scheme would outweigh the visual impact on the context.
- 48 The High Court concluded that part A (defining what is a tall building) and B (identify location suitable for tall building) of the London Plan policy D9 are not gateway policy parts for part C (impact assessment), meaning that a proposal for a tall building could be permitted outside zones designated in local plans, as long as they conform with the other policies of the London Plan.

The Master Brewer Case in relation to plan-making

- 49 The Master Brewer Case interprets how London Plan policy D9 (Tall buildings) should be applied when assessing a proposed tall building in an area that is not allocated in a tall building zone in a development plan. Its outcome is also specific to the assessment of one development which was assessed against a Local Plan produced before the adoption of the London Plan 2021.
- 4.10 However, the objection to policy D4 (Tall buildings) raised by some developers refers to the preparation of policy D4 and its flexibility.
- 4.11 It is the Council's view that the Master Brewer Case provides a precedent in relation to development management decision making when considering tall building schemes outside of tall building zones, and in particular for applications assessed against Plans developed before the 2021 London Plan.
- 4.12 The judgement did not state that Councils should no longer seek to meet the requirements of parts A and B of London Plan policy D9 when developing new Local Plans. Nor did it suggest that the policy wording of part B3 should no longer be relied on.
- 4.13 The Council considers policy D4 (Tall buildings) of the Submission Local Plan to be positively prepared, in conformity with the London Plan Policy D9 (Tall buildings) requirements:
- Part 1 of policy D4 (Tall buildings) defines what is a tall building in Newham in line with part A of London Plan policy D9.
 - Part 2 of Policy D4 (Tall buildings) identifies that there are suitable locations for tall buildings and specifically designates 22 tall building zones in the Plan in line with London Plan policy D9

part B1 and B2. The identification of these has been supported by a detailed assessment and evidence base.

- Implementation text D4.2 clarifies that "Development of tall buildings outside of the Tall Building Zones will be considered a departure from the plan." in line with part B3 of London Plan policy D9 (Tall buildings) which states "Tall buildings should only be developed in locations that are identified as suitable in Development Plans."
- Part 3 of the policy and implementation text D4.3 require tall buildings to meet the visual, functional, environmental and cumulative impact in line with London Plan Policy D9 part C.

- 4.14 The Council acknowledges that on individual applications, the application of planning balance may result in a departure from the plan being considered acceptable, as it was in the Master Brewer Case. We consider this to be less likely following the adoption of this new policy, than would be the case with a pre-2021 London Plan Local Plan, as the new policy approach has been informed by a more thorough and robust evidence base which has extensively considered where tall buildings would be suitable in the borough. However, if individual development circumstances did come to this conclusion, no changes to the wording of policy D4 are required to enable this to occur as this flexibility is afforded to all policies.

Conclusion:

- 4.15 Policy D4 (Tall buildings) has been developed in accordance with the requirement of London Plan Policy D9 (Tall buildings) to direct tall buildings development to tall building zones. The Master Brewer Case does not direct changes to how Councils should meet the requirements of parts A and B of London Plan policy D9.
- 4.16 The Tall Building Annex (2024) robustly evidences that tall buildings outside designated tall building zone would not be suitable following an assessment of the key locational requirements for tall buildings.

OBJECTION TO THE TALL BUILDINGS EVIDENCE BASE

Introduction:

A few developers raised concerns about the methodology used to identify suitable locations for tall buildings, their boundaries and the proposed heights within them.

This section sets out:

- Clarifications to respond to objections to the evidence base methodology used to identify locations and height of the tall building zones. These include objections regarding:
- Assessment of existing and permitted heights and suitable locations for tall buildings;
- Assessment of neighbouring boroughs;
- Supporting the optimisation of the sites.

5 Assessment of existing and permitted heights and suitable locations for tall buildings

- 5.1 A few developers objected to the consistency of the assessment of existing tall buildings in relation to:
- the omission of gas holder structures
 - the exclusion of isolated high-rise buildings as precedents for tall buildings
 - the exclusion of granted schemes that have not yet substantially started.
- 5.2 The Council considers that the analysis of existing building heights across the Borough is sufficiently thorough, as evidenced in the Newham Characterisation Study (2024) and Tall Building Annex (2024), which have been developed in line with the Characterisation and Growth Strategy LPG (2023).
- 5.3 An analysis of building heights across the Borough was undertaken to understand the character of the borough and to inform the definition of a tall building in Newham and to identify suitable locations for tall buildings, as required by the London Plan Policy D9.
- 5.4 As shown in the Tall Building Annex (2024) and in Fig. 7, the assessment of the tall building context in Newham took into account:
- heights of existing tall buildings (Fig. 3 of the Tall Building Annex)
 - heights of emerging context (Fig. 12 of the Tall Building Annex) where substantially started.
- 5.5 This section outlines the justification for the exclusion of gas holders, isolated high-rise buildings and granted schemes that are not yet substantially started, from the assessment of building heights across the Borough.

Omission of gas holder structures:

- 5.6 There are 9 remaining gas holders in Newham:
- 1 Gasholder at Beckton Riverside
 - 1 Gasholder at East Ham
 - 7 Grade II listed Gasholders at Bromley by Bow
- 5.7 St William Homes LLP is the developer of all gasworks sites within the borough and it is putting forward schemes in the following locations:
- N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks
 - N8.SA7 Rick Roberts Way
 - N13.SA3 Former East Ham Gasworks
 - N17.SA1 Beckton Riverside
- All of these sites except N13.SA3 Former East Ham Gasworks are designated as Tall Building Zones and the design principles of each site allocation seeks to enhance the gasholders that have been retained for their heritage value.
- 5.8 St William Homes LLP, raised concerns regarding omitting the gas holder structures in the assessment of tall building heights. They requested the inclusion of site allocation N13.SA3 Former East Ham Gasworks within the East Ham Tall Building Zone (TBZ3) based on the height of the existing gasholder on the site. This issue was also raised by St William during the Regulation 18 consultation which the Council considered, but did not result in a change in policy position, for the following reasons:
- Gasholders are not classified as buildings but as structures. All of the remaining gas holders in Newham are not the enclosed typology (so called ‘gasholder house’), but rather metal frame located in open air. The Historic England blog [‘A Brief Introduction to Gasholders’](#) quotes “the most distinctive visual element was the guide frame, a circular metal structure comprising a frame of metal uprights (often columns) and horizontal girders.”. Although gasholders are quite tall structures, their ephemeral nature has a different impact on the environment. Considering the height of these structures in isolation from the wider context would have misled the assessment of the tall building context and character in Newham. Therefore, gasholders have not been included in the existing heights map.
 - In addition, even if the gasholders had been included within the identification of existing tall buildings within the borough, not all tall buildings are considered to set suitable precedents for future developments (see Fig 20 of the Tall Buildign Annex (2024) for more details). Based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough and, due to its sensitive location in proximity to a Site of Importance for Nature Conservation



Fig 7 Newham emerging building heights

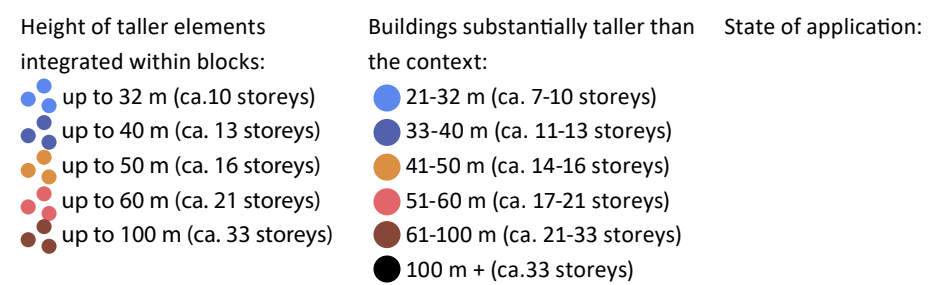
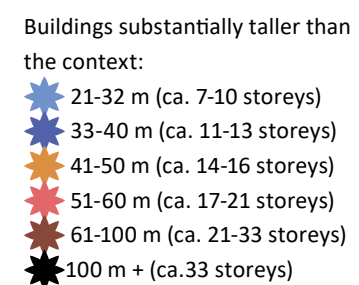


Fig 8 Newham's isolated tall buildings



(SINC), low rise context and in an area with limited accessibility to public transport, N13.SA3 Former East Ham Gasworks site allocation is not considered suitable to accommodate tall buildings developments. The consideration of the height of the existing gasholder would not have changed this conclusion.

- 5.9 Furthermore, it is also noted that the Leigh Road Gasholder within the N13.SA3 Former East Ham Gasworks site allocation is not designated as a heritage asset and could be removed as part of future development. This is another reason why it was not appropriate to include the height of this gasholder in the assessment of existing building heights.

Excluding isolated high rise buildings as precedents for tall buildings:

- 5.10 The Characterisation and Growth Strategy LPG (2023) lays out the process for determining if and where tall buildings may be an appropriate form of development. The guidance suggests the following steps:
- Step one: Sensitivity screening assessment
 - Step two: Alignment with area-wide aspirations
 - Step three: Suitability scoping exercise
 - Step four: Define locations and heights
- 5.11 Step two clarifies that, once areas that are sensitive to tall buildings have been discarded, the remaining areas, which are in principle suitable for tall buildings, should be further assessed to ensure that their development aligns with the Borough's aspirations. Particularly relevant is point 4.4.7 which states that "Where a tall building or buildings negatively impact the character of an area, this existing tall building/s should not be used as a justification for the area being appropriate for tall buildings."
- 5.12 The heights of existing buildings have been considered in the assessment of the tall building context, and this is shown in Fig. 3 of the Tall Building Annex (2024) (also shown in Fig.7). However, through this analysis, it was noted there are many tall buildings that don't respond to the immediate low-rise, medium-rise context. Fig. 20 of the Tall Building Annex (2024) (also shown in Fig. 8) highlights all tall buildings that fall in an area of consistent building height below 21m and which are not considered to provide a suitable precedent for tall building developments. Most of these buildings are post-war residential council estate tower blocks or isolated blocks scattered throughout the borough.
- 5.13 Post-war developments were characterised by modern urban design and planning principles and follow the common template of the juxtaposition between low-rise buildings and high-rise towers surrounded by larger areas of vegetation. Most of the time, modern estates produced inward looking environments detached from the urban fabric. Therefore, existing high-rise towers are the result of historic, economic, social and design considerations that don't reflect the current urban design approach and aspiration to integrate developments within their context.
- 5.14 Little Ilford Estate is an example of the post-war estates that have been built in Newham following the modern principle of locating tall buildings alongside linear buildings ranging from 2-4 storeys. The estate extends on a wide strip of land at the eastern boundary of the borough, adjacent to the North Circular Road in a context characterised by terraced houses. Although the existing tall buildings are now part of the consolidated context within the estate boundary, they don't make a positive contribution to the character of the wider low rise context (Fig.9). Therefore, the Council has not considered it appropriate to establish a tall building cluster in this area of the borough nor any other location that has been considered inappropriate, as illustrated in the Fig. 20 of the Tall Building Annex (2024) (also shown in Fig.8 of this topic paper).



Fig 9 Image of Little Ilford Estate @googlemap

The exclusion of granted schemes that have not yet substantially started:

- 5.15 Fig. 12 of the Tall Building Annex (2024) shows the emerging context in Newham, highlighting all the buildings that have been granted permission and that are under construction with substantial progress. This is also shown in Fig. 7.
- 5.16 The Council considers that to assess the height of the Borough, it was not appropriate to include the height of permitted schemes that have not yet substantially started for the following reasons:
- The planning history of many sites, as evidenced in the Authority Monitoring Report 2022-2023 (2024) in Newham shows that sites have been subject to different applications and, in many cases, planning permissions have not been implemented and/or are about to expire. Therefore, the heights of permitted schemes which have not substantially started, were not considered a fixed parameter to be included in the assessment of the character of the Borough.
 - In addition, planning applications have been assessed against the adopted Newham Local Plan and Adopted LLDC Local Plan or older Plans, and do not necessarily reflect Newham's aspirations. This point is explained in more detail in the section 8 'Consistency between permitted heights and proposed heights' of this topic paper.
- 5.17 However, the Council acknowledges that when consents have been granted to buildings at a greater height than the maximum permissible heights in policy D4 (Tall buildings), those buildings can still benefit from existing consents.

Conclusion:

- 5.18 Based on the considerations set out above, the Council considers that policy D4 (Tall Buildings) has been positively prepared, informed by an adequate assessment of the existing heights in the borough and determines where tall building developments could be appropriate in line with the borough's aspirations. The assessment is robustly evidenced in the Newham Characterisation Study (2024) and Tall Building Annex (2024).

6 Assessment of neighbouring boroughs

- 61 A developer, AIM Land Ltd, raised a concern with the consistency of the tall building assessment and objected to the assessment not including tall building areas within the London Borough of Redbridge and Ilford Metropolitan centre when assessing suitable locations for tall buildings.
- 62 When assessing suitable locations for tall buildings, the Council has considered the spatial relationship with neighbouring boroughs. This is shown in the Borough edge condition section 2.5 of the Tall Building Annex (2024). The edges sensitivity to height map, Fig. 23, highlights the tall building zones defined by neighbouring boroughs along the edges bordering Newham and identifies which edges are more sensitive to tall building developments.
- 63 The Council recognises that the map didn't include the Ilford Tall building zone, which broadly follows the boundary of the Ilford Metropolitan Centre (Fig. 10) at the eastern boundary of Newham. This information has now been considered. Based on this information, a small edge in the north-eastern boundary of the borough could be, in principle, an edge not sensitive to tall buildings. Fig. 23 of the Tall Building Annex (2024) has been updated in Fig. 11 below.
- 64 The suitability scoping assessment as shown in section 3.2 of the Tall Building Annex (2024) considered the following criteria for the assessment of suitable locations for tall buildings:
 - Areas of consistently tall buildings (21m or more)
 - Low sensitivity to change areas
 - Transform areas
 - Site allocations
 - Opportunity Areas (OAs)
 - Areas identified for tall buildings in the adopted Local Plan
 - High Public Transport Accessibility Level (PTAL 4-6b)
 - Town and local centres

Therefore, areas designated as town centres within Newham's boundary have been considered suitable for tall building developments. Town centres in proximity to Newham's boundary have not been considered in the assessment as the Council's objective is to direct growth to areas that have a town centre designation and not within their vicinity.

- 65 In light of the above, a further review of the sensitivity and suitability scoping assessment has been undertaken to ensure a consistent approach. Based on this information the site of interest, LIL10: Grantham Road, has not been considered suitable for tall buildings allocation.
- 66 It is recognised that the site sits in a low sensitive to change area, in a transform area with high level of accessibility. However, it is not a site allocation, it is not within an opportunity area and, although it is in close proximity to Ilford Town Centre, it is not within a town centre designation. Furthermore, excluding the post-war residential towers, which are not considered a precedent for tall buildings, as highlighted in Fig. 20 of the Tall Building Annex (2024), the site doesn't sit in an area with a consistent height above 21m.

Conclusion

- 67 The Council considers policy D4 (Tall buildings) to be positively prepared and based on robust evidence, the Tall Building Annex (2024), which:
 - consistently assessed suitable locations for tall buildings; and
 - assessed the sensitivity to tall buildings of neighbouring boroughs, and
 - considered town centres within Newham's boundary one of the criteria for identifying suitable locations for tall buildings.
- To respond to the representation raised by AIM Land Ltd, the Council:
 - undertook a further assessment of the sensitivity to tall buildings of neighbouring boroughs and included the north-eastern boundary of the borough as an edge not sensitive to tall buildings as shown in Fig. 11;
 - reviewed the suitability and sensitivity to tall buildings of the LIL10: Grantham Road area. The assessment confirmed that the site is not a suitable location for tall building developments.

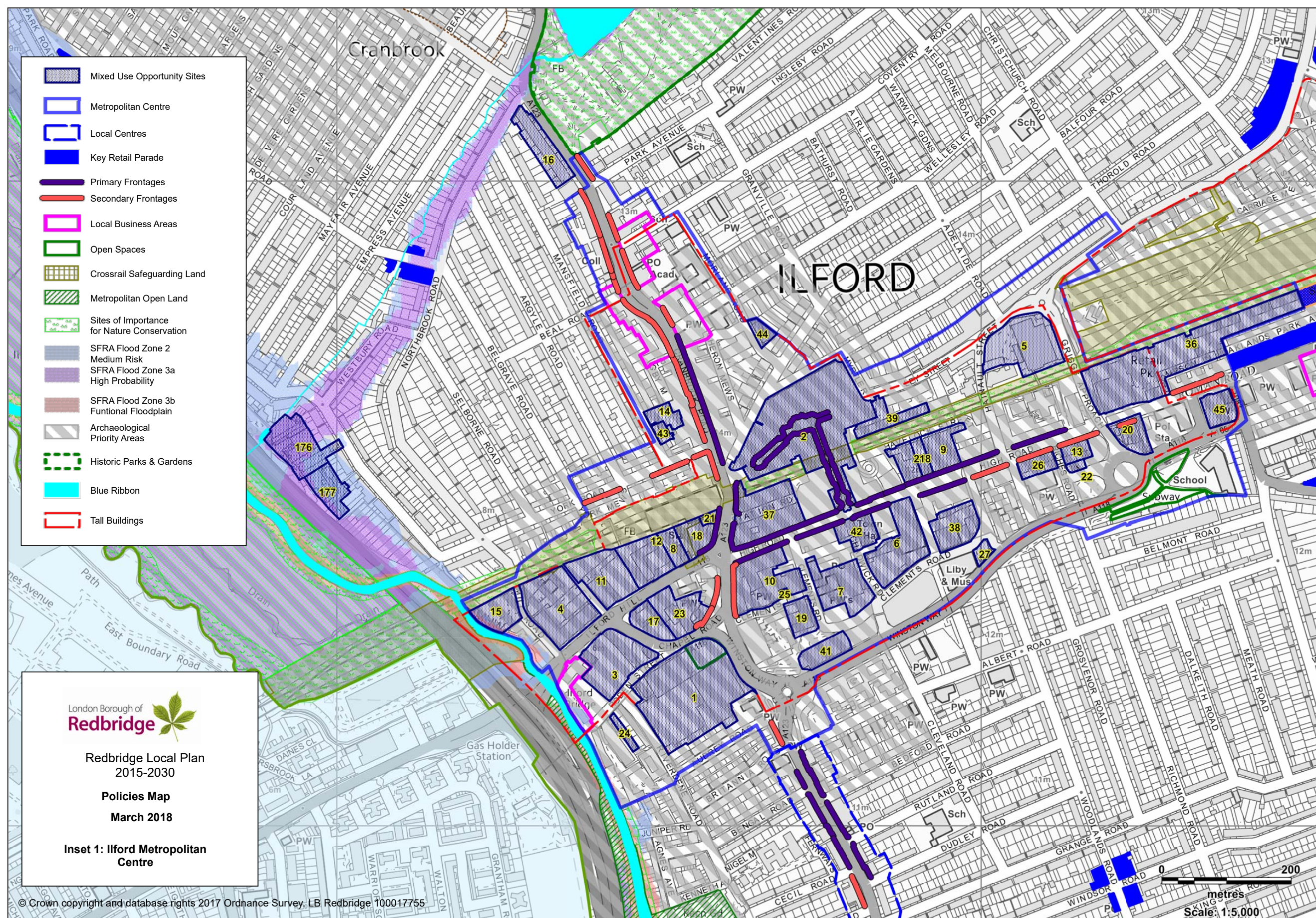


Fig 10 Ilford Metropolitan Centre and Tall Building zone

**Royal Borough of Greenwich
Tall Building Zones:**

- 1: East Creekside
- 2: Greenwich Peninsula West
- 3: Greenwich Peninsula
- 4: Charlton Riverside
- 5: Woolwich Town Centre
- 6: Tamesis Point in Thamesmead
- 7: Thamesmead Town Centre
- 8: Abbey Wood Station Area

**Royal Borough of Redbridge
Tall Building Zones:**

- 9: Ilford Metropolitan Centre
Tall Building Zone

**London Borough of Tower
Hamlets Tall Building Zones:**

- E: Leamouth
- D: Blackwall
- B: Canary Wharf
- C: Marsh Wall and Millwall

- Sensitive edge
- Not sensitive edge

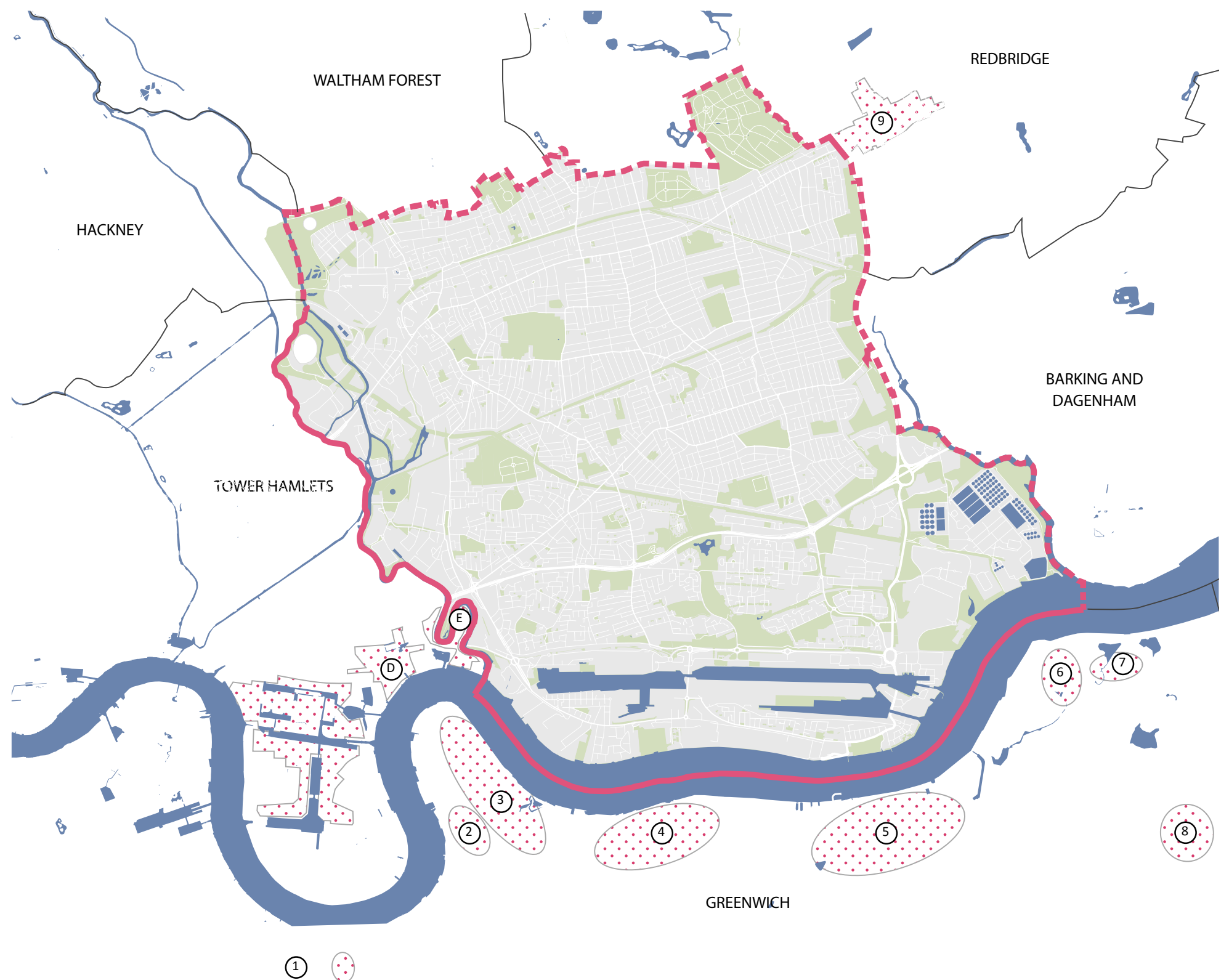


Fig 11 Edges sensitivity to height map - updated

7 Supporting optimisation of sites

- 7.1 Most of the developers who responded to the Regulation 19 consultation objected to the tall building strategy and related site allocations design principles and suggested a design-led approach should be adopted, to be in conformity with the London Plan Policy D3 (Optimising site capacity through the design-led approach). Specifically, they consider that the inclusion of maximum heights could compromise the optimisation of the sites and their deliverability and that defining height using a case-by-case approach would better support site optimisation.
- 7.2 This section clarifies how policy D4 (Tall Buildings) has been prepared in conformity with London Plan Policy D1 (London’s form, character and capacity for growth), London Plan policy D3 (Optimising site capacity through the design-led approach) and London Plan policy D9 (Tall buildings). It also provides information on the methodology used to ensure the optimisation of the sites through site allocation capacity testing, based on a design-led approach, as required by the London Plan Guidance (LPG) Optimising site capacity: A design-led approach (2023).
- 7.3 The objective of the London Plan (2021) is to supports Good Growth, making best use of land and directing development towards locations that can accommodate growth in a sustainable way. These objectives are achieved through a series of topic-based policies, including D1 (London’s form, character and capacity for growth), D3 (Optimising site capacity through the design-led approach) and London Plan policy D9 (Tall buildings) which are complementary to each other.
- 7.4 London Plan policy D1 (London’s form, character and capacity for growth) requires boroughs to undertake area assessments to understand the character of the Borough and use the findings to identify suitable locations for growth, including locations that might be suitable for tall buildings.
- 7.5 London Plan policy D1. Part B (3) also encourages boroughs to set out acceptable heights, scale and massing for site allocations following a design-led approach as required by Policy D3 (Optimising site capacity through the design-led approach).
- 7.6 London Plan Policy D3 (Optimising site capacity through the design-led approach) requires development to “make the best use of land by following a design-led approach that optimise capacity of sites, including site allocations.” Paragraph 3.3.2 states that “A design-led approach to optimising site capacity should be based on an evaluation of the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.”
- 7.7 Supporting text of Policy D3, 3.3.1 puts a lot of emphasis on clarifying that optimising site capacity doesn’t necessary mean maximising capacity, rather identifying a design solution that responds to the context and specific character of the site. The text clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.” This concept is reiterated across different guidance documents that support London Plan policies.
- 7.8 Chapter 4 of the Characterisation and Growth Strategy LPG (2023) lays out the process to determine if and where tall buildings may be an appropriate form of development. Paragraph 4.4.6 shows how the optimisation of the site could be achieved with mid-rise high density schemes. A practical example of a site that has been optimised with a mid-rise scheme is included in the guidance and is shown in Fig. 12.
- 7.9 The Optimising Site Capacity: A Design-led Approach LPG (2023) gives more detailed indications on how the design-led approach should be undertaken in order to determine the most appropriate form of development on a site. Paragraph 1.1.1 states “Good growth across London requires development to optimise site capacity, rather than maximising density. This means responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, need for increased housing supply, and key factors such as access by walking, cycling and public transport, alongside an improved quality of life for Londoners. Capacity-testing should be the product of the design-led approach, and not the driver.”

Two planning applications for Hook Rise South, Tolworth, Royal Borough of Kingston upon Thames



Fig 12 Example of site optimisation extracted from Characterisation LPG

The guidance identifies five stages:

- Stage 1: Site analysis
 - Stage 2: Design Vision
 - Stage 3: Draft site-based design parameters
 - Stage 4: Testing site-capacity
 - Stage 5: Finalise site-based design codes
- 7.10 The Council considers that policy D4 (Tall buildings) has been positively prepared in line with Policy D9 (Tall buildings), Policy D1 (London’s form, character and capacity for growth) and Policy D3 (Optimising site capacity through the design-led approach). The suitability of site allocations as tall buildings locations and the optimisation of the sites within those designated areas has been assessed through the methodology explained below.
- 7.11 Through the Plan-making process the Council:
- Undertook an assessment of the borough’s character. This analysis is robustly evidenced in the Newham Characterisation Study (2024), which identifies areas to be conserved, enhanced and transformed and suitable locations for tall buildings. The findings of this analysis informed the vision and the urban design considerations set out in Chapter 8 Vision - Neighbourhood Design Principles.
 - Identified 22 tall building zones with maximum heights and prevailing heights that are considered appropriate to respond to the surrounding context of each zone. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. These are all the attributes that London Plan policy D3 states should be considered when evaluating the capacity for growth of a site. The assessment of suitable locations for tall buildings is evidenced in the Tall Building Annex (2024).
 - Identified 45 site allocations that can support sustainable growth. The Council undertook a sifting exercise that evaluated where a site was suitable, available and achievable for housing and economic development over the plan period. The site assessment process is included in the Site Allocation and Housing Trajectory Methodology Note (2025).
 - Tested site allocations as part of the Newham Characterisation Study work following the 5 stages

design-led approach which:

- evaluated site’s attributes;
- identified which land uses and building form and scale were more suitable for each site;
- tested site capacity through 3D modelling. The 3D model of each site was also imported into the London Vu City model to test the appropriateness of the proposal in its context;
- finalised design principles for each site allocation.

The comprehensive design-led capacity methodology is explained in detail in the Site Allocation and Housing Trajectory Methodology Note (2025).

Set out design requirements for each site allocation within the Neighbourhood section of the Plan. The design requirements of each site allocation are drawn from the neighbourhood vision set out in the Newham Characterisation Study (2024) and from the design principles finalised in the design-led capacity testing. The design requirements include the principles for movement routes through the site, the scale of development and how this should relate to any sensitive context and on the delivery of green infrastructure. While the Council recognises that the development of each site could be delivered through different site layouts and building typologies, the design requirements ensure that every proposal will reflect the Council’s wider vision and objectives.

Conclusion

7.12 The evidence and justification outlined above demonstrate that:

- The London Plan (2021) requires boroughs to respond comprehensively to the requirements of different, but complementary, policies: policy D1 (London’s form, character and capacity for growth), policy D3 (Optimising site capacity through the design-led approach) and policy D4 (Tall buildings). As set out above, the Council considers that the approach in the Submission Local Plan is in conformity with all 3 policies.
- Policy D4 (Tall buildings) has been prepared in conformity with London Plan policy D9 (Tall Buildings), identifying suitable locations for tall buildings and appropriate heights in the development plan.
- Policy D4 (Tall buildings) has been prepared in conformity with policy D3 (Optimising site capacity through the design-led approach). The spatial strategy and the height parameters for the Tall Building Zones result from an evaluation of design-led approach considerations.
- Therefore, Policy D4 (Tall buildings) and the inclusion of maximum heights for site allocations doesn’t compromise the optimisation of these sites, which the London Plan is clear does not require the inclusion of tall buildings, to be achieved.

CONSISTENCY BETWEEN PERMITTED HEIGHTS AND PROPOSED HEIGHTS

Introduction:

A number of developers objected to inconsistencies between the height of tall buildings in consented schemes and the proposed maximum heights set out in Policy D4 (Tall buildings).

This section clarifies:

- The methodology used to define appropriate heights in locations that are considered suitable for tall buildings in the borough.
- The reasons for discrepancies between permitted heights and proposed maximum heights in some areas.

8 Consistency between permitted heights and proposed heights

- 81
- The objective of policy D4 (Tall Buildings) is to manage the growth of the borough, directing tall building developments to locations that are less sensitive to, and more suitable for, tall buildings, in line with the requirements of London Plan policy D9 (Tall buildings).
- 82
- To support the London Plan requirements, the Characterisation and Growth Strategy LPG (2023) lays out the process for determining if and where tall buildings may be an appropriate form of development. The guidance suggests the following steps:
 - Step one: Sensitivity screening assessment
 - Step two: Alignment with area-wide aspirations
 - Step three: Suitability scoping exercise
 - Step four: Define locations and heights
- 83
- The identifications of areas suitable for tall buildings developments in Newham has followed the steps suggested in the Characterisation and Growth Strategy LPG (2023) and this is outlined in the Tall Building Annex (2024).

Methodology to identify maximum height parameters

- 84
- An analysis of building heights across the Borough was undertaken to understand the character of the borough and to inform the definition of a tall building in Newham and to identify suitable locations for tall buildings and appropriate heights.
- 85
- Fig. 3 and Fig. 12 of the Tall Building Annex (2024) (also shown in Fig. 3 and Fig. 7) show that the assessment of the tall building context in Newham took into account:
 - heights of existing tall buildings; and
 - heights of the emerging context where substantially started.

86 The existing building heights map, Fig. 3 of the Tall Building Annex (2023), shows the analysis of the height character of the borough through different height parameters as set out in Table 2 below:

Table 2 Newham existing building heights

Height	Range
Prevailing height of the area	0-10 m (ca.0-3 storeys)
	10-21 m (ca.4-6 storeys)
	21-32 m (ca. 7-10 storeys)
Height of taller elements integrated within blocks	up to 32 m (ca.10 storeys)
	up to 40 m (ca. 13 storeys)
Buildings substantially taller than the context	21-32 m (ca. 7-10 storeys)
	33-40 m (ca. 11-13 storeys)
	41-50 m (ca. 14-16 storeys)
	51-60 m (ca. 17-21 storeys)
	61-100 m (ca. 21-33 storeys)
	100m + (ca. 33 storey)

87 Fig. 6 of the Tall Building Annex (2024) shows the emerging context in Newham, highlighting all the buildings that have been granted permission and that are under construction. This is also shown in Fig. 7. Section 5 ‘Assessment of existing and permitted heights and suitable locations for tall buildings’ of this topic paper explains in detail the reason for the exclusion of granted schemes that have not yet substantially started from the height assessment of the Borough.

88 The heights proposed in policy D4 (Tall buildings) result directly from this analysis of the existing heights identified in the borough as highlighted in the Table 3 below:

Table 3 Newham existing and proposed building heights

Existing Height	Proposed height
Prevailing height of the area	Prevailing height
0-10 m (ca. 0-3 storeys)	N/A
10-21 m (ca. 4-6 storeys)	9-21m (ca. 3-7 storeys)
21-32 m (ca. 7-10 storeys)	21-32m (ca. 7-10 storeys)
Buildings substantially taller than the context	Maximum height
21-32 m (ca. 7-10 storeys)	32m (ca. 10 storeys)
33-40 m (ca. 11-13 storeys)	40m (ca. 13 storeys)
41-50 m (ca. 14-16 storeys)	50m (ca. 16 storeys)
51-60 m (ca. 17-21 storeys)	60m (ca. 20 storeys)
61-100 m (ca. 21-33 storeys)	100m (ca. 33 storeys)
100m + (ca. 33 storey)	N/A

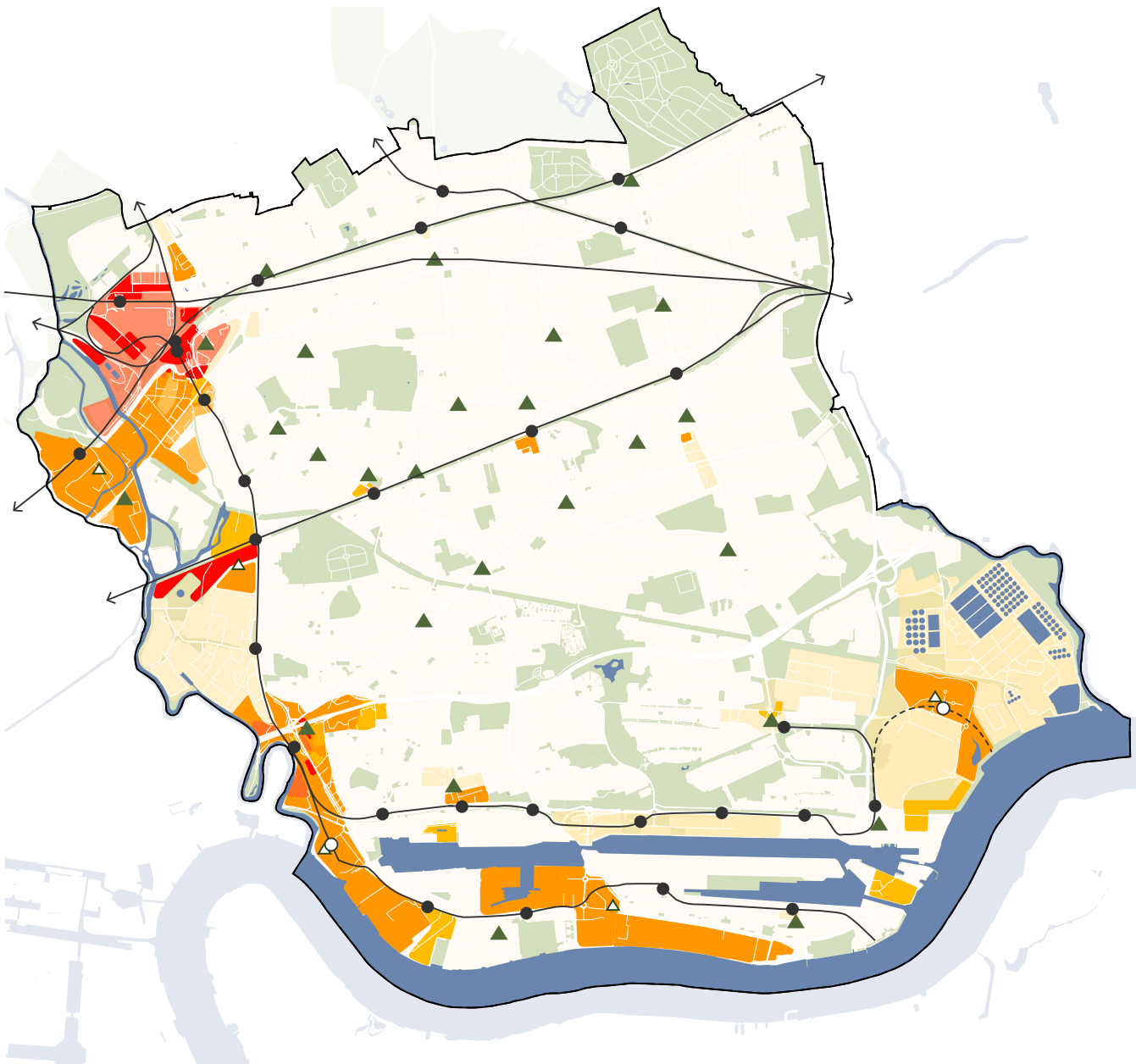


Fig 13 Heat heights map

- Tall Building Zone up to 32 m
- Tall Building Zone up to 40 m
- Tall Building Zone up to 50 m
- Tall Building Zone up to 60 m
- Tall Building Zone up to 100 m
- Town centre & Local Centre
- Designated Future Centre
- High capacity public transport
- Proposed transport station
- Proposed DLR station

Section 3 ‘Prevailing height parameters’ of this topic paper explains in detail the difference between maximum heights and prevailing heights and why these are fundamental to delivering schemes that are well designed and sensitively integrated within the existing context.

89 The Plan’s aspiration is to distribute heights across the locations considered suitable for tall buildings in a way that defines a clear spatial hierarchy, creating clusters of tall buildings that are proportionate to their role within the local and wider context. This townscape approach is visually pictured in the heat heights map (Fig. 13) and explained in detail in the tall building spatial hierarchy section of the Tall Building Annex (2024).

Discrepancies between permitted heights and proposed maximum heights

8.10 Consented schemes in Newham have been assessed against:

- Adopted Newham Local Plan (2018), or
- Adopted LLDC Local Plan (2020).

8.11 Policy SP4 (Tall buildings) in the adopted Newham Local Plan, was developed in conformity with London Plan (2016) and was informed by the Tall Building Study (2018). Policy SP4 (Tall buildings) identifies Stratford and Canning Town as two priority locations for tall building developments and supports tall buildings developments in strategic sites within the Arc of Opportunity. However, the policy also allows limited opportunities for tall buildings in other areas if they meet the design, management and technical criteria.

8.12 Policy BN.5 (Proposals for tall buildings) in the adopted LLDC Local Plan was developed in conformity with the Intend to Publish version of the London Plan (2021). Policy BN.5 directs tall buildings towards the centre boundaries and sets out prevailing height parameters for each sub area. However, tall buildings outside centre boundaries could be justified if they are of exceptional design and bring public benefits.

8.13 The Submission Local Plan policy D4 (Tall buildings) has been developed in conformity with the London Plan (2021) policy D9 (Tall Buildings) which requires boroughs to identify locations where tall buildings may be an appropriate form of development and requires boroughs to identify in their development plan what is considered a tall building for their specific localities. The Policy D4 (Tall buildings) is supported by a robust evidence base. The Tall Building Annex (2024) includes a more detailed townscape analysis compared to the Tall Building Study (2018) which informed the Newham Adopted Local Plan (2016). The Tall Building Annex (2024) summarizes the sieving exercise that has been undertaken to identify locations where tall buildings may be an appropriate form of development and expands on the townscape assessment for each area of the borough. Suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2023) which has been developed in line with the Characterisation and Growth Strategy LPG. In line with the findings of the Newham Characterisation Study (2024) and the Tall Building Annex (2024), and with the London Plan (2021) policy D9 (Tall buildings) requirements, the Submission Local Plan has developed a new approach to tall buildings, which differs from the approach to tall buildings in the adopted Newham Local Plan and LLDC Local Plan. The new spatial strategy set out in Policy D4 (Tall buildings) will direct tall building developments only in locations that are considered suitable for tall buildings. The proposed maximum height parameters will help manage the appropriate scale of development in each location.

8.14 The tall building approach in the adopted plans has resulted in:

- tall buildings being approved in areas that, based on the most updated borough-wide analysis (Tall Buildings Annex 2024), are not considered suitable for tall buildings; and
- consented schemes with heights of tall elements that are not necessarily aligned with the borough-wide hierarchy.

8.15 The difference in spatial strategies and level of policy detail between the adopted plans and the Submission Local Plan has inevitably resulted in inconsistencies between the heights permitted in some areas under the adopted Newham Local Plan and LLDC Local Plan and the maximum height parameters proposed in the emerging policy D4 (Tall buildings).

8.16 However, the Council acknowledges that when consents have been granted for buildings at a greater height than the maximum permissible heights in policy D4 (Tall buildings), those buildings can still benefit from existing consents.

Conclusion

8.17 Policy D4 (Tall) has been prepared in conformity with London Plan policy D9 (Tall buildings) requirement and following the process outlined in the Characterisation and Growth Strategy LPG (2023) to identify suitable locations for tall buildings and appropriate heights in the development plan in line with the borough’s aspiration.

- 8.18 The Council considers policy D4 (Tall buildings) to be positively prepared and based on robust evidence, the Tall Building Annex (2024), which:
- adequate assess existing and emerging heights in the borough to identify suitable locations for tall building developments;
 - includes a more detailed townscape assessment compared to the evidence base that supported the Newham Adopted Local Plan and LLDC Local Plan;
 - defines a borough-wide spatial hierarchy creating clusters of tall buildings that are proportionate to their role within the local and wider context.

8.19 The reason behind the inconsistency between proposed heights and existing consents is that the Submission Local Plan tall building strategy is based on a townscape assessment that seeks to set and preserve a borough wide spatial hierarchy. If granted schemes are implemented they can still benefit from existing consents. However, the proposed tall building strategy will help manage the hierarchy of tall buildings in the borough whenever new applications are brought forward in a way which is more in keeping with the London Plan and the Council’s spatial and townscape objectives.

SUPPORT FOR INDUSTRIAL INTENSIFICATION

Introduction:

The following developers: AIM Land Ltd, GLP (International Business Park, Rick Roberts Way) and SEGRO, who all have an interest in industrial land in the borough, requested that the approach to tall building zones be reconsidered to ensure Policy D4 (Tall buildings) will support industrial intensification in line with the London Plan and Local Plan industrial intensification objectives.

This section clarifies:

- The justification for the designation of Strategic Industrial Locations (SILs) as tall building zones following the Regulation 18 consultation;
- How policy D4 (Tall buildings) adequately supports industrial intensification in line with Submission Local Plan policies J1 (Employment and growth) and J2 (New employment floorspace);
- How industrial intensification can be delivered outside a tall building designation.

9 Support for industrial intensification

- 91 Developers, AIM Land Ltd and GLP (International Business Park, Rick Roberts Way), objected to the consistency of the methodology used in the Tall Building Annex (2024) to assess appropriate locations for tall buildings and the resulting impact on industrial intensification. They consider that the use of maximum heights could limit the opportunity for industrial intensification and contradict the objectives of policies J1 (Employment and growth) and J2 (New employment floorspace). A developer, SEGRO, suggested adding wording to policy D4 (Tall buildings) stating that tall buildings of 30-40m can potentially be appropriate on all Strategic Industrial Land designations, in order to allow multi storey developments.
- 92 The same issue was raised at the Local Plan Regulation 18 consultation by GLP (Land at Central Thameside West and Former Alnex site) and SEGRO. Following their representations, a review of the tall building assessment was undertaken. Through this analysis it was concluded that as not all SILs were designated as Tall building zones, this could limit the opportunity for industrial intensification.
- 93 The Table 4 below summarise the SILs that were already designated in their entirety or partially as Tall Building Zones in the Draft Local Plan (Regulation 18):

Table 4 SILs designated as Tall Bulding Zones in the Draft Local Plan (Regulation 18)

Strategic Industrial Location (SIL)	Tall Building Zone (TBZ)	Maximum height
SIL.2: British Gas/Cody Road	TBZ14: Manor Road	32m
SIL.5: Beckton Riverside (partially)	TBZ5: Gallions Reach	32m
SIL.6: Bow Goods Yard (partially)	TBZ18: Stratford High Street	50m

94 SILs that were not designated as Tall Building Zones were the following:

- SIL.1: London Industrial Park
- SIL.3: Thameside West
- SIL.4: Thameside East
- Remaining areas of SIL.5: Beckton Riverside
- Remaining areas of SIL.6: Bow Goods Yard

Through the assessment review undertaken following Regulation 18 consultation it was concluded that:

- most of the SILs sit within the 3 Opportunity Areas: Olympic Legacy OA, Royal Docks and Beckton Riverside OA and Poplar Riverside OA, which are considered in principle suitable for tall building developments.
- SIL.1: London Industrial Park, does not sit within an opportunity area but it is adjacent to the Royal Docks and Beckton OA. The site also sits in a low sensitive to change area, in a transform area but with low level of transport accessibility and in an area that does not have a consistent height above 21m. Therefore, considering the balance of those criteria, the SIL.1: London Industrial Park has been included as a suitable location for tall building developments, to support industrial intensification, but within the lowest height category (32m).
- The area of Bow Good Yard identified in the Characterisation Study as a transform area was designated within TBZ18: Stratford High Street. Following the Regulation 18 review, TBZ18: Stratford High Street has been extended to also include the area of Bow Goods Yard identified in the Characterisation Study as an enhance area, to recognise the intensification opportunity of the site in its entirety.
- Therefore, following the conclusion of the assessment review and for the reasons set out above, all SILs have been included in tall building zones in order to support greater industrial intensification with a stacked industrial typology. Therefore, the Submission Local Plan adequately enables greater intensification on all SILs.

95 Table 5 below summarises all the SILs that are allocated with a tall building designation and their maximum heights:

Table 5 SILs designated as Tall Bulding Zones in the Submission Local Plan

Strategic Industrial Location (SIL)	Tall Building Zone (TBZ)	Maximum height
SIL.1: London Industrial Park	TBZ4: Beckton	32m
SIL.5: Beckton Riverside	TBZ5: Gallions Reach	32m - 40m
SIL.3: Thameside West	TBZ13: Canning Town	50m
SIL.2: British Gas Site/ Cody Road	TBZ14: Manor Road	32m
SIL.6: Bow Goods Yard	TBZ18: Stratford High Street	50m
SIL.4: Thameside East	TBZ22: Thameside East	50m

- 96 Newham’s industrial intensification is supported by policies J1 (Employment and growth) and J2 (New employment floorspace). The policies support industrial intensification through multi-storey development, directing B8 (storage or distribution) and B2 (general industrial) uses to Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs).
- 97 Policies J1 (Employment and growth) and J2 (New employment floorspace) were informed by the [Industrial Land and Uses Draft LPG \(2023\)](#). The guidance demonstrates how industrial intensification could be delivered with different building typologies and industrial co-location.
- 98 Table 6 summarises the range of ways industrial intensification can be delivered and how these relate to tall building requirements. The table includes a description of the industrial typologies covered in the Industrial Land Use Draft LPG, the floor-to-ceiling height suggested for each typology and if the typology is therefore deliverable within or outside Newham’s tall building zones.

Table 6 Industrial intensification in Tall Building Zones

Type	Description	Height of each storey	TBZ compatibility
ST1	small standalone single-storey industrial units, which are suitable for any small-scale industrial use.	4.5-8m	Deliverable outside TBZ
ST2	large standalone single-storey industrial units, which are suitable for any large-scale industrial use.	8m	Deliverable outside TBZ
IN1	industrial intensification by stacking smaller units on top of small units . The typology is suitable for any small-scale industrial uses, but some Class B8 and B2 uses with frequent vehicular movements are less likely on upper floors.	4.5-8m	16m (2 storeys of 8m) 18m (4 storeys of 4.5m) Deliverable outside TBZ
IN2	Industrial intensification by stacking smaller units on top of larger units . The units on the ground floor are suitable for large-scale. The units on the upper floors are suitable for small-scale industrial use including Class B8 and B2 uses, although some Class B2 uses with significant detrimental amenity impacts are less likely.	6-10m	18m (3 storeys of 6m) 20m (2 storeys of 10m) Deliverable outside TBZ

IN3	Industrial intensification by stacking large industrial uses . This is suitable for Class B8 and B2 uses on all floors.	10-12m	20m (2 storeys of 10m) Deliverable outside TBZ 24m (2 storeys of 12m) Not deliverable outside TBZ In the Submission Local Plan all SILs have been included in TBZs to allow for greater industrial intensification.
CO1	Industrial co-location by developing small industrial units alongside residential. This is suitable for any small-scale industrial uses, but some Class B8 and B2 uses with frequent vehicular access and/or some Class B2 uses with significant amenity impacts are less likely.	4.5-8m	Deliverable outside TBZ depending on the height of residential buildings and where considered acceptable by Submission Local Plan policies J1 and D6.2.
CO2	Industrial co-location by stacking residential on top of workshop or studio units. This is suitable for small-scale Class E(g)(iii) or E(g)(ii) industrial uses, as well as small-scale Class B8 uses, without detrimental amenity impacts or frequent vehicular movements.	4m	Co-location with residential development is not supported in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs). Co-location could be deliverable outside TBZs depending on the height of the residential elements and only in specific Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Areas (MBOAs) identified in Tables 8 and 9 in Submission Local Plan Policy J1 (Employment and growth).
CO3	Industrial co-location by stacking residential on top of medium industrial units. This is suitable for medium-scale Class E(g)(iii) or E(g)(ii) industrial uses as well as Class B8 uses without detrimental amenity impacts or frequent vehicular movements.	6m	Co-location with residential development is not supported in Strategic Industrial Locations (SILs) and Local Industrial Locations (LILs). Co-location could be deliverable outside TBZs depending on the height of the residential elements and only in specific Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Areas (MBOAs) identified in Tables 8 and 9 in Submission Local Plan Policy J1 (Employment and growth).

- 99
- Based on the floor-to-ceiling heights set out in the Industrial Land Use Draft LPG the table demonstrates that:
- Single storey industrial units, ST1 and ST2 can be delivered outside tall building zones;
 - Stacked industrial typologies, IN1, IN2, between 2 and 3 storeys, can be delivered outside tall building zones;
 - Stacked industrial typology of large scale units, IN3, cannot always be delivered outside tall building zones. If large industrial units of 12m floor-to-ceiling height are proposed they will exceed the 21m height threshold. For this reason, the approach to tall buildings in relation to SILs has been reviewed and all SILs have been included within tall building zones. This approach also aligns with Policy J1 (Employment and growth) which will direct B8 (storage or distribution) and B2 (general industrial) to SILs.
 - To ensure industrial growth, co-location is generally not supported in the Plan, unless explicitly stated in Policy J1 (Employment and growth). Industrial co-location typologies, C01, C02, C03 can be delivered outside tall building zones if the total height of the building doesn't exceed the 21m height threshold, and only in specific Local Mixed Use Areas (LMUAs) and Micro Business Opportunity Areas (MBOAs) identified in Tables 8 and 9 in Submission Local Plan Policy J1(Employment and growth). Industrial co-location typologies should also be delivered in line with policies D6 (Agent of change).

Conclusion:

- 9.10
- Based on the evidence highlighted in this section, the conclusion is that policy D4 (Tall buildings) adequately supports industrial intensification. Industrial intensification is supported in SILs, which are all in tall building zones, ranging from 32m to 50m, where the borough's spatial strategy directs high intensity industrial development, as well as outside tall building zones where a range of common typologies could be delivered within the 21m threshold.

Introduction:

Historic England supported the changes made following the Regulation 18 consultation with regards to better referencing heritage considerations to manage the impact tall building developments could have on conservation areas and heritage assets. However, Historic England's representation at the Regulation 19 consultation continued to object to the robustness of the evidence base, in relation to heritage assessments, supporting policy D4 (Tall buildings) and site allocations within N8 Stratford and Maryland Neighbourhood.

This section sets out:

- Historic England objections to the evidence base supporting policy D4 (Tall Buildings) and related site allocations.
- A summary of how site allocations were selected, in line with Historic England 'The Setting of Heritage Assets' and 'The Historic Environment and Site Allocations in Local Plans' notes.

10 Impact on Conservation Area and Heritage Assets

- 10.1
- At the Regulation 18 consultation, Historic England expressed their concern that the Plan was not adequately informed by an understanding of the potential impact of development on the significance of heritage assets and how this should inform design parameters of site allocations, in particular for the Stratford Area. Historic England also required further clarity on how the transition between conserve and transform areas would be managed, in particular within the Stratford Area.
- 10.2
- The relevant tall building zones and related site allocations within the N8 Stratford and Maryland neighbourhood are shown in Table 7 below:

Table 7 Tall Building Zones and site allocations within N8 Stratford and Maryland

Tall Building Zones (TBZs)	Site Allocations
TBZ18: Stratford High Street	N7.SA3 Sugar House Island N8.SA3 Greater Carpenters District N8.SA4 Stratford High Street Bingo Hall N8.SA7 Rick Roberts Way N8.SA8 Bridgewater Road N8.SA9 Pudding Mill
TBZ19: Stratford Central	N8.SA1 Stratford Central N8.SA2 Stratford Station N8.SA5 Stratford Town Centre West N8.SA6 Stratford Waterfront South
TBZ20: Chobham Manor / East Village	N8.SA10 Chobham Farm North

Fig. 14 illustrates the tall building zones within the N8 Stratford and Maryland neighbourhood boundary and their spatial relationship with the St John’s Conservation Area.

Following the Regulation 18 consultation, the Council added further wording to policy D4 (Tall Buildings) to reference to the importance of conserving and enhancing the significance of heritage assets and to include a reference to the relevant Character Appraisal and Management Plans. The wording of Policy D4 (Tall buildings) and relevant site allocation design principles - have been changed to clarify how development proposals of tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. The wording of the following tall building zones and site allocations (Table 8) has been reviewed by Historic England, which is supportive of the changes.

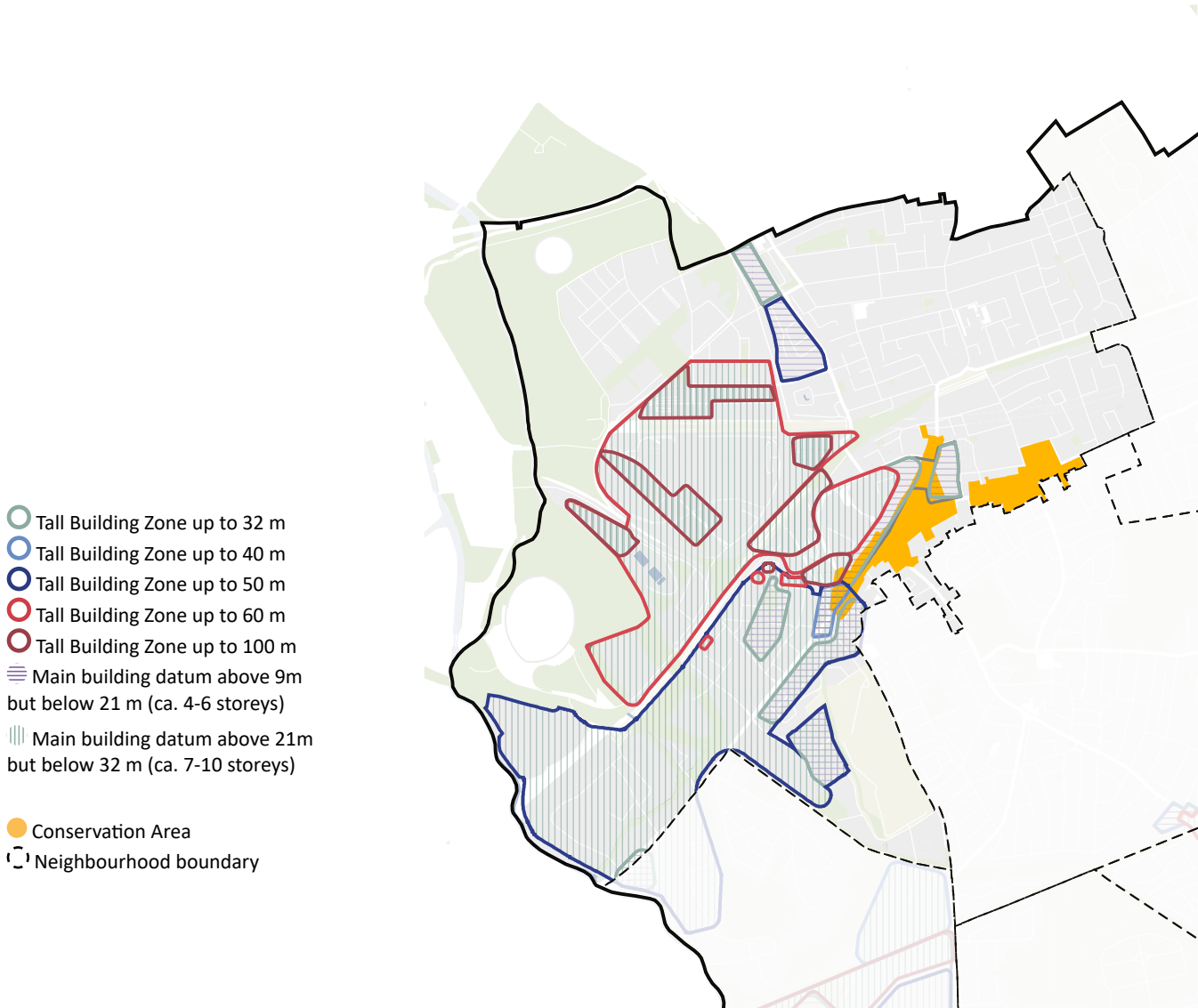


Fig 14 Spatial relationship between conservation area and tall building zones

Table 8 Tall Building Zones and site allocations’s wording change reviewed by Historic England

Tall Building Zones (TBZs)	Site Allocations
TBZ1: Forest Gate	N15.SA2 Woodgrange Road West
N/A	N15.SA1 Lord Lister Health Centre
TBZ3: East Ham	N/A
TBZ15: West Ham Station	N7.SA2 Twelvetrees Park and Former Bromley By Bow Gasworks
TBZ16: Abbey Mills	N7.SA1 Abbey Mills
TBZ18: Stratford High Street	N7.SA3 Sugar House Island N8.SA3 Greater Carpenters District N8.SA4 Stratford High Street Bingo Hall N8.SA7 Rick Roberts Way N8.SA9 Pudding Mill
TBZ19: Stratford Central	N8.SA1 Stratford Central N8.SA2 Stratford Station
TBZ20: Chobham Manor / East Village	-

103 Table 1: Tall buildings of policy D4 (Tall Buildings) of the Submission Local Plan identifies suitable locations for tall buildings and provides further guidance for developments in proximity to sensitive areas. These include requirements for townscape assessment, protection of heritage assets and views set out in the conservation appraisal and management plan and protection of the London View Management Frameworks that intersect the borough.

An example of the added wording is shown in Table 9 below:

Table 9 Example of added wording to TBZ19:Stratford Central requirements

Tall Building Zone	Further guidance
TBZ19: Stratford Central	<ul style="list-style-type: none">Along the sensitive edge of the Broadway, heights should be reduced with opportunity for limited tall building elements of up to 32m (ca. 10 storeys).Tall buildings in immediate proximity to the conservation area and other designated heritage assets should address and respond to their scale, grain and significance as well as the wider streetscape and local character.Tall buildings should conserve the character of the area without harming the significance of heritage assets or detracting from important landmarks and key views, including views set in Stratford St John’s conservation area appraisal and management plan.Impacts on London View Management Framework (LVMF) views should be tested to ensure that tall buildings will result in no harm on the protected vistas.Development including tall buildings in this zone should assess their visual and townscape impact in the context of existing and permitted tall buildings to ensure the cumulative impact does not saturate the skyline.

104 The design principles for site allocations in the vicinity of heritage assets in the Submission Local Plan include new wording to clarify how development proposals for tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between conserve and transform areas. The design principles also refer to Conservation Area Appraisals and Management Plans and protected views.

An example of the wording is shown in Table 10 below:

Table 10 Example of added wording to the N8.SA1 Stratford Central design principles

Site Allocation	Design Principles
N8.SA1 Stratford Central	[...] Development should conserve and enhance St John’s Conservation Area, St John’s Church and other listed buildings as well as the University Conservation Area and listed buildings in proximity to the site. Tall buildings in immediate proximity to the conservation area and other heritage assets should address and respond to their scale, grain and significance, as well the wider streetscape and local character. In responding to the existing character of the town centre and conservation area, the shoulder of proposed buildings should conserve and enhance the fine grain and townscape character of the continuous frontages of three to four storeys and rooflines. This should contribute to enclosing the space and establishing a sense of place, without affecting the dominance of St John’s Church, which should remain the focal point of the conservation area. The key views set in Stratford St John’s Conservation Area Appraisal and Management Plan should be protected to conserve and enhance the role of historic landmarks in the conservation area. Development should use a range of materials and detailing that complements the character of the conservation area to enhance its visual richness and quality. Tall buildings should provide a positive contribution to the skyline without harming the background of the protected linear view: King Henry VIII’s Mound, Richmond to St Paul’s Cathedral (9A). Development which restores and bring backs into a viable use the Grade II listed West Ham Court House and Alice Billings House, which are currently on the Heritage at Risk Register, will be supported, in accordance with Local Plan Policy D9. Any development of The Rex should retain its facade.

105 During the Regulation 19 consultation, Historic England requested that further evidence is still needed to understand the historic setting and inform the scale and massing and the impact on the historic environment. Historic England suggested following a significance-based approach as set out in the following advice notes:

- The Setting of Heritage Assets
- The Historic Environment and Site Allocations in Local Plans.

106 [The Setting of Heritage Assets](#). This document offers advice on understanding settings and on managing change within the settings of heritage assets. The guide gives advice on how to consider and assess applications for developments that can impact the significance of the historic environment. The documents highlight the importance of the setting of heritage assets and the cumulative impact on the significance of a setting which could have already been compromised by unsympathetic developments. However, paragraph 17 states “This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.”

107 [The Historic Environment and Site Allocations in Local Plans – Advice Note 3](#). This document offers advice to identify site allocations where growth could be supported, ensuring that heritage considerations are taken into account in the site selection methodology. The document suggests the following process for the identification of site allocations:

- Evidence gathering
- Site selection
- Site allocation policies

108 Table 11 summarises how the Council has already adequately addressed the process for the selection of the site allocations suggested in Advice Note 3:

Table 11 Summary of the site allocation process in line with Historic England advice.

1. Evidence gathering	What the Council did:
Gathering historic environment evidence base	The Council undertook robust evidence gathering, consulting available documents and producing an analysis of the heritage assets in Newham which is summarised in the Heritage and Landmark section (Chapter 3) of the Newham Characterisation Study (2024). The understanding of the historic environment is supported by: - Conservation appraisal and management plans - Newham Characterisation Study (2024) - Newham Townscape Assessment, Section D of the Tall Building Annex (2024).
2. Site Selection Steps	What the Council did:
STEP 1 Identify which heritage assets are affected by the potential site allocation	The Council undertook a selection of site allocations through a site assessment. The potential harm to heritage assets has been considered as one of the criteria to consider the suitability as a site allocation, as described in the Site Allocation and Housing Trajectory Methodology Note (2025).
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s)	The Newham Characterisation Study (2024) Heritage and Landmarks section in Chapter 3, maps all the conservation areas, listed and locally listed buildings, schedule monuments, historic parks and gardens and archaeology priority areas across the borough. It also highlights all the landmarks that contribute to way-finding and identity. Finer grained heritage asset and landmarks are referenced in Chapter 8 at the neighbourhood scale. Heritage consideration are reflected in the vision of each neighbourhood under the paragraph ‘heritage and fixed elements’. As part of the Characterisation Study, Maccreanor Lavington produced a townscape assessment. For each area of the borough, the character assessment evaluated architecture and urban design quality, using the following criteria: Context, Identity, Built form, Movement, Nature, Public realm, Uses, Homes and Buildings, Resources. The full assessment has been attached in section D of the Tall Building Annex (2024).

STEP 3 Identify what impact the allocation might have on that significance	The Council undertook the capacity testing of the site allocations as outlined in the Site Allocation and Housing Trajectory Methodology Note (2025). The capacity testing drew on an analysis of site context and takes account of heritage assets, placemaking and landmarks on and in proximity to the sites, in line with the findings and neighbourhood visions set out in the Newham Characterisation Study (2024) The feasibility of the site allocation developments was tested in context with 3d models imported into the London Vu City model.
STEP 4 Consider maximising enhancements and avoiding harm	The capacity testing of the site allocations has informed the site allocation design principles and guidance for each tall building zone in the Draft Local Plan (Regulation 18). The guidance included the best locations for tall buildings and the appropriate step down approach when in proximity to sensitive areas. The site allocation maps in the Neighbourhood section of the Draft Local Plan (Regulation 18) included reference to listed and locally listed buildings. Following the Regulation 18 consultation, the Council updated the wording of policy D4 (Tall Building Zones), policy N8 Neighbourhood and Site Allocation design principles, in order to ensure the protection of the heritage assets. The wording has been reviewed by Historic England, which is supportive of the changes.
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	The Council undertook a sifting exercise that evaluated where a site was suitable, available and achievable for housing and economic development over the plan period. This is contained in the Site Allocation and Housing Trajectory Methodology Note (2025).
3. Site allocation policies	What the Council did:
Site allocation design principles should provide clear references to the historic environment and heritage assets	The Council commissioned the Newham Characterisation Study (2024) and the capacity testing of site allocations. This work provided design principles for site allocations and guidance for each tall building zone to ensure historic assets are protected and enhanced. The site allocation design principles have also been expanded with wording agreed with Historic England in order to ensure the protection of the historic assets.

- Partially sits within the Olympic Legacy Opportunity Area, which has been designated as a key location for large scale development and public transport improvement;
- Is characterised by a high level of public transport accessibility (PTAL score 4-6b);
- Includes the Stratford Metropolitan Centre designation;
- Includes large scale site allocations;
- Includes a higher concentration of ‘transform’ areas - areas with a fragmented urban grain and low quality character where new development can establish a new character.

Therefore, the analysis summarised in Fig. 15, demonstrates that there are areas within N8 Stratford and Maryland neighbourhood that are considered suitable for tall building developments.

However, the Council recognises the medium rise character of the south-east side of the High Street, the scattered composition of tall buildings delivered in the past years and the risk of harming the significance of St John’s Conservation Area. For these reasons, the tall building strategy requires lower height parameters outside Stratford Metropolitan Centre.

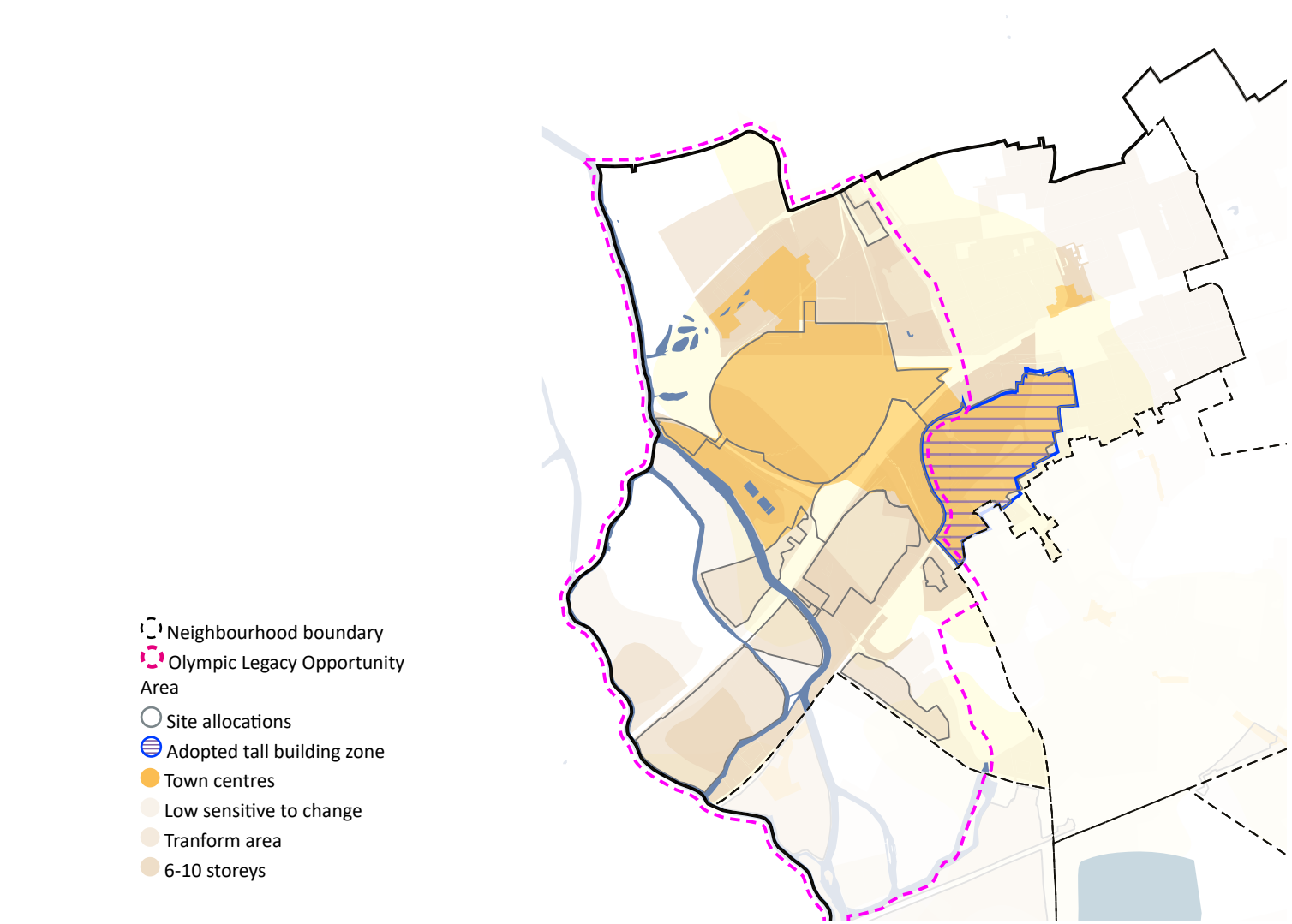


Fig 15 N8 Stratford and Maryland - suitability to tall buildings

- 109 The objective of policy D4 (Tall Buildings) is to manage the growth of the borough, directing tall building developments in locations that are less sensitive and more suitable for tall buildings. As demonstrated in Table 11, the Council has undertaken a high-level assessment of historic settings and their significance to help identify an overarching strategy to manage tall buildings.
- 1010 As stated in the Tall Building Annex (2024) p.35, conservation areas, listed buildings and non-designated heritage have been considered sensitive to tall building developments. However, the suitability screening has evidenced that there are some areas - areas of poor urban character and high levels of accessibility – that, although in proximity to conservation areas, are considered suitable for tall building developments. In this case, the tall buildings strategy has designated those areas as tall building zones but with lower maximum heights.
- 1011 The suitability Scoping Assessment in the Tall Building Annex (2024) evidences that N8 Stratford and Maryland neighbourhood:

CHANGES FROM THE DRAFT LOCAL PLAN (REGULATION 18) TO THE DRAFT SUBMISSION LOCAL PLAN (REGULATION 19)

Introduction:

Key issues raised during the Regulation 18 consultation have been processed and reviewed to determine if changes to the Draft Submission Local Plan (Regulation 19) were necessary. The assessment lead to changes to Policy D4 (Tall Buildings) which are summarised in the [Design Main Changes Summary](#). The changes included:

- an amendment to policy D4 to add further wording to require high quality design for tall buildings, including their ability to define good quality public realm; to minimise the impact of tall buildings on watercourses, open spaces and microclimate; and to address the importance of conserving and enhancing the significance of heritage assets and key views set out in the London View Management Framework and in adopted Conservation Area Appraisals and Management Plans;
- an amendment to the maximum heights in some tall building zones to reflect the spatial hierarchy, the desire to create legible and consolidated clusters and to reflect the findings of the suitability analysis undertaken to identify suitable locations for tall buildings;
- the designation of new tall building zones to support industrial intensification in all Strategic Industrial Lands (SILs);
- the designation of new tall building zones to support development on additional site allocations which were assessed as suitable for tall building developments.

Following the Regulation 19 consultation, a few developers raised objections to these amendments. The main objections are listed below:

1. L&Q and the Royal Docks team, objected to the consistency of the methodology to identify suitable locations for tall buildings in relation to changes that have been made following the Regulation 18 consultation in specific tall building zones or site allocations. These are N2.SA2 Lyle Park West site allocation which sits within TBZ11: Lyle Park and the Albert Island scheme which sits within TBZ6: Albert Island. The change to TBZ6: Albert Island has been clarified and resolved through the Statement of Common Ground with the Royal Dock Team.
2. A few developers, IQL Office LP, Unibail-Rodamco-Westfield and Get Living, have objected to inconsistencies between the permitted height and proposed height of tall building zone boundaries that have been extended to include sites S2 and S3 at Stratford Cross and Plot M7B within TBZ19: Stratford Central. This issue is addressed under section 8 ‘Consistency between permitted heights and proposed heights’.
3. Two developers, LAMIT c/ CCLA Investment Mangement Ltd and ExCel and Mount Anvil, objected to the proposed height parameters in the site allocations that have been designated as tall building zones following Regulation 18 consultation, requesting these heights be increased.

- 10.12 The Council considers that policy D4 (Tall buildings) sets a borough-wide spatial strategy and hierarchy that adequately balances the opportunity for growth with the need to protect and enhance sensitive areas. In the case of N8 Stratford and Maryland neighbourhood, due to its emerging context, its Metropolitan Centre nature and its capacity for growth, TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. TBZ18: Stratford High Street has instead been considered appropriate for a gradual transition from the higher cluster to the surrounding context, with opportunities for tall elements up to 50m.
- 10.13 However, it is noted that tall building developments are still subject to a detailed townscape analysis during the pre-application stages. This requirement is stated in the implementation text for policy D4.3: “Development proposals within tall building zones and in close proximity to ‘conserve’ areas should address visual impact on the surrounding context and avoid harm to the significance of heritage assets and their settings.”
- 10.14 Finally, the Council recognises the growth around Stratford Area and the importance of identifying the evolving character of Stratford in the Conservation Appraisal and Management Plan. Within the Statement of Common Ground, the Council and Historic England agreed that a review of the St John’s Conservation Area Appraisal and Management Plan will be undertaken following the adoption of the Local Plan to ensure the protection of the historic environment within Stratford and Maryland neighbourhood.

Conclusion:

- 10.15 Based on the evidence highlighted in this section, policy D4 (Tall Buildings) and relevant site allocations are supported by a robust evidence base and that the impact of tall buildings on conservation areas and heritage assets is protected by further guidance in Table 1: Tall buildings and design principles in the site allocations.
- 10.16 A further understanding of the setting of the St. John’s conservation area, which will result in an update of the St John’s Conservation Area Appraisal and Management Plan, has been agreed with Historic England. While policy D4 (Tall buildings) will direct tall buildings to appropriate areas, the St John’s Conservation Area Appraisal and Management Plan will help in the assessment of tall building developments in the Stratford area, informing decisions at planning application stage.

This section sets out:

- A detailed explanation of why changes were made to TBZ11: Lyle Park from the Regulation 18 Draft Local Plan to the Regulation 19 Submission Local Plan.
- The justification for the changes that have been made to the Draft Submission Local Plan (Regulation 19) in TBZ4: Beckton and TBZ21: Excel West, following the regulation 18 consultation, and why the Council does not consider it appropriate to make any changes to the maximum height parameters in these zones following the Regulation 19 consultation.

11 TBZ11: Lyle Park

- 11.1 L&Q objected to the consistency of the tall building assessment set out in the Tall Building Annex (2024) and its outcome with regards to the height assigned to TBZ11: Lyle Park and N2.SA2 Lyle Park West site allocation. The developer raised that the Tall Building Annex (2024) evidenced that the L&Q land (Fig. 16) has the same suitability and sensitivity to tall buildings as the adjacent land and that therefore the 40m maximum height was inconsistent with the maximum height assigned to adjacent land (50m).
- 11.2 TBZ11: Lyle Park in the Draft Local Plan (Regulation 18) shows a permissible maximum height up to 40m and 50m on the N2.SA2 Lyle Park West site allocation (N3.SA2 Lyle Park West in Draft Local Plan). The tall building zones map shows a 50m height designation on the L&Q ownership, 'to mark the new Neighbourhood Parade at West Silvertown DLR' station as stated in policy D4, Table 1 (Row: TBZ11: Lyle Park; Column: Further Guidance). In response to feedback received at the Regulation 18 consultation, the height on the L&Q ownership has been reduced from 50m to 40m See Fig 16 and Fig. 17. This section sets out the justification for this change.
- 11.3 The Council considers that the suitability scoping assessment has been positively prepared, as is evidenced in the Tall Building Annex (2024). From the assessment it is evident that the N2.SA2 Lyle Park West site allocation sits, in its entirety, in:
- a transform area;
 - a low sensitive to change area;
 - the Royal Dock & Beckton Riverside Opportunity Area.

Therefore, the N2.SA2 Lyle Park West site allocation has been identified in its entirety as a suitable location for tall buildings, within TBZ11: Lyle Park West.

- 11.4 However, Tate and Lyle objected, through their representation received at the Regulation 18 consultation, to the location of tall buildings in proximity to their land and factory due to the agent of change principle. They expressed their concern that tall residential development adjacent to industrial uses on their land could undermine the operation of these established industrial uses. In their representation, Tate and Lyle highlighted the uses on their site, such as the heat extraction fan and the concrete batching plant and a soil remediation operator, which create critical issues of noise and dust which would conflict with residential uses on the N2.SA2 Lyle Park West site. Tate and Lyle suggested the extension of the buffer buildings along the boundary of the site and requested that the policy should clearly state that the height of the buffer buildings should be the same as the residential buildings, in order to be effective.

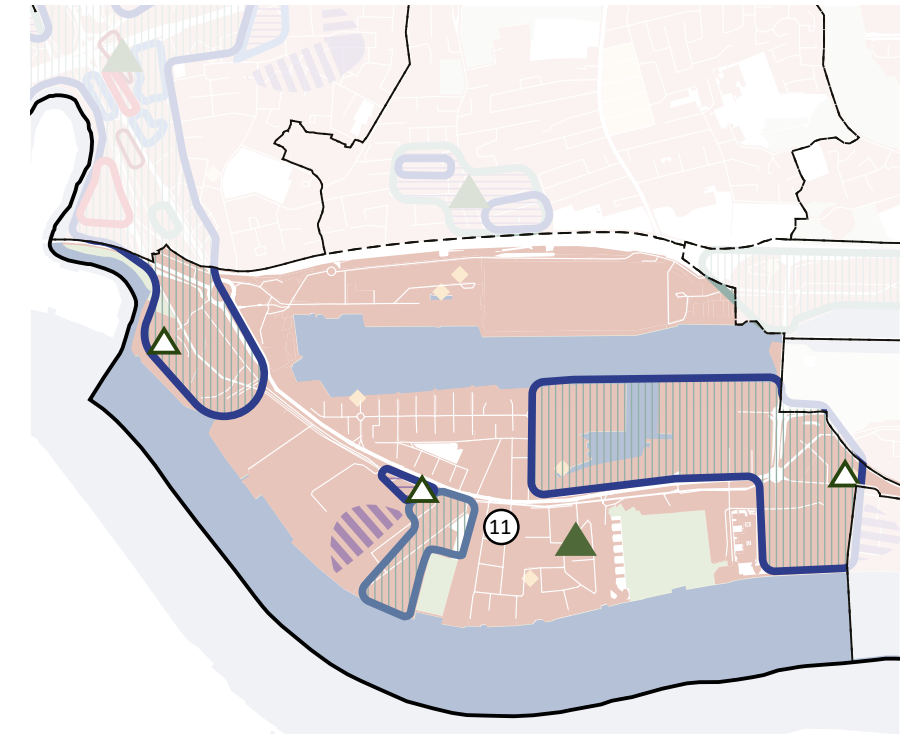
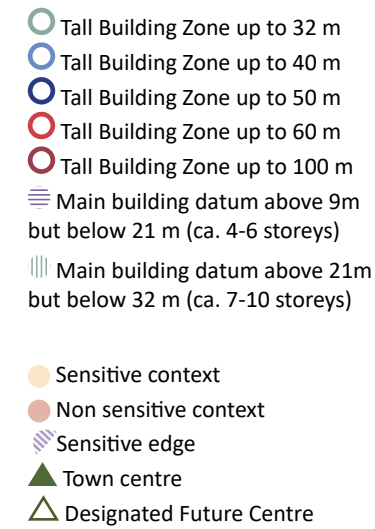


Fig 16 TBZ11: Lyle Park, Draft Local Plan (Regulation 18)

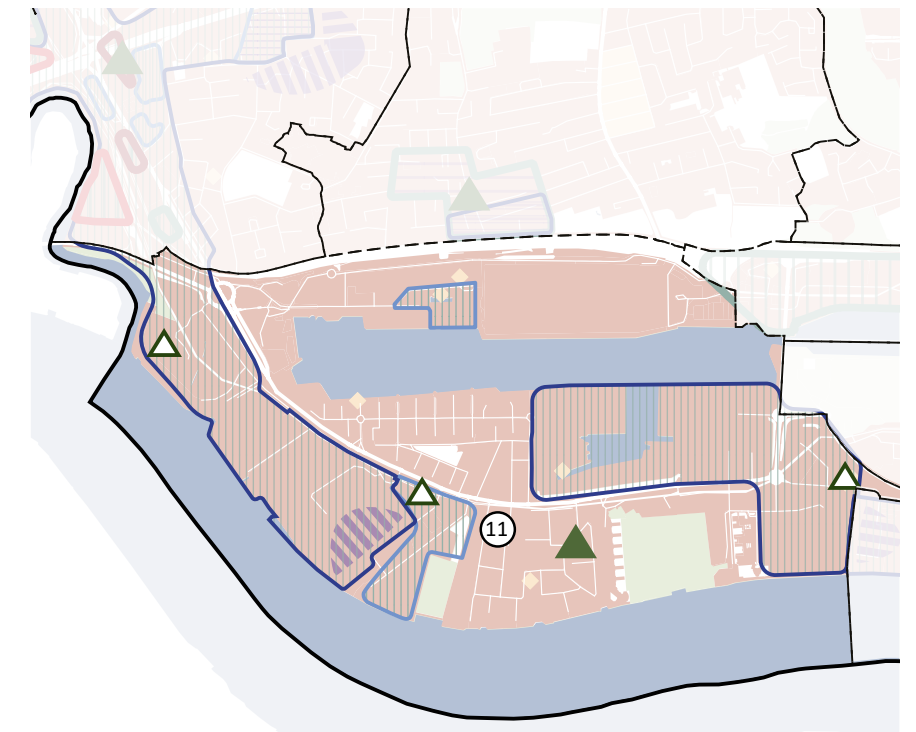
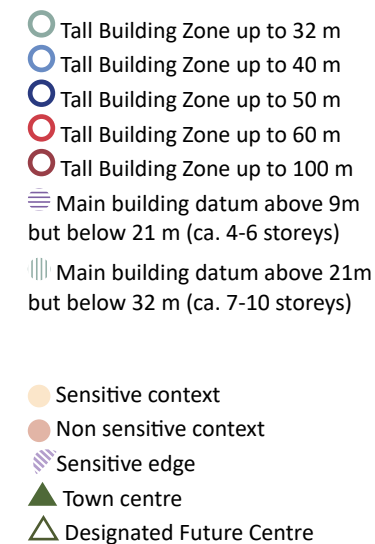


Fig 17 TBZ11: Lyle Park, Draft Submission Local Plan (Regulation 19)

- 115 In is noted that to ensure a good quality of design and to avoid any conflict with the operation of the industrial use, the current permission (19/01791/FUL) on the L&Q site (Fig. 18) is subject to a significant number of conditions. The scheme was approved in 2019 but it has not yet been built, highlighting the challenges of delivering residential development in close proximity to industrial uses.
- 116 Consequently, reflecting the experience of the currently permitted scheme and in response to the Tate and Lyle representation at Regulation 18 consultation, the Council undertook a review of the site conditions in relation to industrial uses on the adjacent Tate and Lyle land and concluded that a buffer building on the L&Q site, as suggested by Tate and Lyle, would have considerably reduced the land available for development. With this constraint in mind, the Council concluded that reducing height on the L&Q site would better help reduce the conflict between the residential and industrial uses, while optimising the site for development.
- 117 To mitigate the impact of any development on the operation of the industrial site, protecting and enhancing the SIL, in line with policy J1 (Employment and Growth) and to ensure a good environmental quality for residents, the maximum height parameter on TBZ11: Lyle Park West and N2.SA2 Lyle Park West has decreased from 50m to 40m. See Fig. 17.
- 118 However, the Council acknowledges that the consented scheme can be built at a greater height than the maximum permissible heights in policy D4 (Tall buildings), where the conditions are also met.



Fig 18 L&Q site boundary line

12 TBZ4: Beckton

- 121 LAMIT c/ CCLA Investment Management Ltd submitted a call for sites submission during the Regulation 18 consultation for the allocation of the Alpine Way Site. They proposed that the south-western part of the site should be part of the 40m zone of TBZ4: Beckton. They also proposed taller height parameters: “The design work carried out in 2018/2019 established that across the majority of the site articulated blocks between 4 and 10 storeys (c.32m) would be appropriate, however taller elements of between 12 and 15 storeys (c.46m) would be appropriate along the western boundary with Woolwich Manor Way, with a taller 15 to 18 storey (c.55m) cluster in the south-western corner of the site, adjacent to the Woolwich Manor Way/Windsor Terrace/Tollgate Road roundabout.” [Reg18-E-109/012].
- 122 Following their call for sites submission and representation at the Regulation 18 consultation, the Council designated the site as a site allocation (N11.SA3 Alpine Way). It also undertook a suitability assessment of the site which evidenced that the south-western part of the site could be included in the 40m zone of TBZ4: Beckton but couldn’t accommodate greater height.
- 123 The request for a maximum height greater than 40m has been reiterated at the Regulation 19 consultation. No further modifications have been made or proposed because, from the sensitivity and suitability exercise in the Tall Building Annex (2024) it was evidenced that, due to its location outside the Royal Docks and Beckton Riverside Opportunity Area, in a low rise context and in close proximity to the locally listed Winsor Terrace, the site is not considered suitable to accommodate greater height.

13 TBZ21: Excel West

- 131 ExCel and Mount Anvil submitted a call for sites submission during the Regulation 18 consultation for the allocation of the site to the west of the Excel centre. They proposed that the site should be included in a tall building zone.
- 132 Following their call for sites submission and representation at the Regulation 18 consultation, the Council designated the site as a site allocation (N2.SA5 Excel Western Entrance). It also undertook a capacity testing and a suitability assessment of the site which evidenced that the site could accommodate a tall building element up to 40m to the west of the site. The TBZ21: Excel West was added to the tall building strategy and policy D4.
- 133 At the Regulation 19 consultation, the developer objected to the proposed height parameters and requested greater prevailing height and greater maximum height parameter: “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.” [Reg19-E-183/14].
- 134 The representation received at the Regulation 19 consultation included a Townscape and Heritage Assessment prepared by The Townscape Consultancy, which seeks to demonstrate that the site has a potential for greater height from a heritage and townscape perspective. The information included in the representation has been considered, although the document didn’t include any visual assessment to demonstrate that the proposed development wouldn’t cause any harm to the historic asset, Stothert and Pitt Cranes (Grade II), Warehouse W (Grade II) and Warehouse K (Grade II). In addition, the conclusion of the assessment aligns with the Council’s position and states “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.”

135 The Council considers that the current approach to heights on this site remains sound. Following the sensitivity and suitability assessment undertaken following the Regulation 18 consultation and as evidenced in the Tall Building Annex (2024), the site has been designated as a tall building zone, to recognise its location within an Opportunity Area and the high rise context to the west. However, the site includes significant heritage assets: Stothert and Pitt Cranes (Grade II) and Warehouse W (Grade II) and it is in the vicinity of Warehouse K (Grade II) and includes an open space that the council aims to protect in terms of quantity and functionality. To recognise the sensitivity of the site, the tall buildings strategy has designated this areas as tall building zone but with a lower maximum height.

Conclusion:

136 Based on the evidence highlighted in this section, the conclusion is that policy D4 (Tall Buildings) has been positively prepared. The Council has adopted a consistent approach when assessing the suitability for tall buildings and the changes made from the Draft Local Plan (Regulation 18) to the Submission Local Plan (Regulation 19) are justified.

CONCLUSIONS

14 Conclusions

- 141 This section provides an overarching conclusion to all the key issues set out in the topic paper, demonstrating that the approach taken to tall buildings in the Submission Local Plan is sound. However, detailed conclusions in relation to each key issue have been set out in each section.
- 142 Firstly, the topic paper demonstrates that policy D4 (Tall buildings) has been developed in conformity with the NPPF:
 - Policy D4 (Tall Buildings) and the guidance in relevant site allocations have been developed to maximise site capacity in areas identified as suitable locations for Newham’s growth. These locations include brownfield areas, ‘transform’ areas, areas within town centres and areas in close proximity to public transport.
 - Policies D4.3 and D4.4 of the Submission Local Plan ensure that tall buildings are of a high-quality design and are well integrated with the surrounding context. Clear design expectations for each site allocation have been identified in the Neighbourhood section of the Plan and are the result of urban design considerations set out in the Newham Characterisation Study, Chapter 8 Vision - Neighbourhood Design Principles (2024).
- 143 Secondly, the topic paper demonstrates that policy D4(Tall buildings) has been developed in conformity with the London Plan (2021):
 - Part 1 of policy D4 (Tall buildings) defines what is a tall building in Newham. The definition of tall buildings, sets at 21m, is in conformity with the London Plan definition and reflects the low-rise, medium-rise context of the borough. The single definition of a tall building provides an approach that facilitate the assessment of tall buildings in the borough. The reference to number of storeys provides an easy way to understand what could be achievable, especially for the local community.
 - Part 2 of policy D4 (Tall buildings) identifies tall building zones and the maximum and prevailing heights that could be developed in each zone. The height parameters identified facilitate the management of tall building developments, to ensure a borough-wide hierarchy and a sensitive integration with low-rise, medium-rise context and heritage assets.
- 144 The topic paper also demonstrates that policy D4 (Tall buildings) is justified and supported by a robust evidence base: the Newham Characterisation Study (2024) and the Tall Building Annex (2024), which have been developed in conformity with the Characterisation and Growth Strategy London Plan Guidance (2023).
- 145 Lastly, the topic paper demonstrates that policy D4 (Tall buildings) has been positively prepared, meeting the Council’s objective of delivering new homes, enhancing heritage assets and supporting industrial intensification, in line with the London Plan requirements for sustainable growth.
 - Policy D4 (Tall buildings) has been developed in conformity with London Plan policy D9 (Tall buildings) and D3 (Optimising site capacity through the design-led approach), identifying tall building zones in the development plan and supporting the optimisation of the site allocations,

as outlined in the Site Allocation and Housing Trajectory Methodology Note (2025). Suitable locations for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Therefore, the spatial strategy for the Tall Building Zones results from an evaluation that addresses design-led approach considerations.

- Policy D4 (Tall buildings) has adequately addressed the impact on conservation areas and heritage assets providing detailed requirements in the tall building policy and site allocations wording. However, the Council is committed to updating the St John's conservation area appraisal and management plan.
- Policy D4 (Tall buildings) adequately supports industrial intensification in all Strategic Industrial Locations (SILs) in line with policies J1 (Employment and growth) and J2 (New employment floorspace) and in line with the industrial typologies illustrated in the Industrial Land and Use Draft LPG.

