

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/002	Design	D1 Design Standards			D1.3		D1.3	Blank	Blank						Blank	<p>This follows on from our response provided on 23/01/23 and we have the below further comments:</p> <p>1) We are supportive of Policy D1, but would still recommend that Policy D1, Section 3 (page 48) is reworded to include specific mention of other Policing Units that do not necessarily administer the SBD Scheme but are nonetheless vital for overall safety and security. Whilst we are supportive of the requirements for sites to achieve SBD accreditation, we would request that the mention of the Silver award is removed and only mentions accreditation. This helps to remove the difficulties that sites with Heritage aspects can have in achieving Certification (as they may only be able to attain Bronze) and helps to encourage sites wherever possible to try and attain Gold (rather than immediately going for Silver).</p> <p>2) We are supportive that in the Policy Implementation section D1 (page 52) it links early engagement and discussion to MPS Units: “Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). Secured by Design accreditation for the physical security features for buildings will be expected for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Developments should aim to achieve Silver Award level. Early engagement with the Metropolitan Police Service is encouraged to ensure the proposal can meet this level of accreditation.”</p>	<p>We would recommend wording as follows: “Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings [(Silver award)] via early and ongoing engagement with the Metropolitan Police Designing out Crime Officers (DOCOs), Counter Terrorism Security Advisors (CTSAs), Traffic Management Unit (TMU) and with the British Transport Police (BTP).”</p> <p>As per point 1, our recommendations regarding the removal of just mentioning the Silver award would also be recommended for this [implementation] section.</p>	<p>The Council’s objective for this policy approach is to ensure that safety and security measures are designed in the most effective way, based on the most up-to-date standards.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective in a range of development scenarios and has therefore made the following wording changes, which are included in the modification table.</p> <p>[D1.3] Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings (Silver award).</p> <p>[D1.3 Implementation, second paragraph] Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). [text moved from the beginning of this second implementation paragraph to form new paragraph, in order to separate out the more generally applied SBD accreditation guidance] Secured by Design accreditation for the physical security features for buildings will be expected for all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Developments should aim to achieve Silver Award level. Early and ongoing engagement with the Metropolitan Police Service's Designing out Crime Officers (DOCOs) is encouraged to ensure the proposal can meet this level of accreditation, and to understand what other teams should be engaged in the design and delivery processes - e.g. Counter Terrorism Security Advisors (CTSAs), the Traffic Management Unit (TMU) and/or the British Transport Police (BTP).</p> <p>Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure).</p>

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/023	Design	D1 Design Standards						Blank	Blank						Blank	<p>Policy D1: Design Standards page 48</p> <p>1. All developments should have regard to the Newham Characterisation Study (2024) and any further, relevant Council-led design guidance and/or code and apply all of the following qualities of good design where applicable:</p> <p>a. Create welcoming buildings and spaces that are well integrated socially, ecologically and physically into their neighbourhoods. Avoid creating isolated and disconnected places that are not easy to move through and around.</p> <p>c. In public realm and communal spaces, ensure clear sight lines and visual permeability to help feelings of safety, legibility and wayfinding.</p> <p>f. Promote a sense of enclosure and definition that supports the role of the public and communal space(s).</p> <p>g. Provide natural surveillance for public and communal spaces through overlooking from neighbouring buildings and/or activities taking place within the space.</p> <p>3. Safety and security features of buildings should be well integrated into the overall design, and complement and not impede delivery of quality public and communal spaces. Major developments should achieve Secured by Design accreditation for the physical security of buildings (Silver award).</p> <p>4. Temporary buildings that are likely to be used for three years or more (including years already in use) should be designed to a high standard, with particular attention to enabling accessibility, promoting active travel, providing high quality landscaping, and mitigating amenity impacts.</p> <p>5. The quality of design should be clearly demonstrated at application stage. Major developments fitting the terms of reference of the Newham Design Review Panel should be assessed by the panel and any community and/or youth design review panel appointed by the Local Planning Authority.</p>		Support noted.

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/024	Design	D1 Design Standards					D1.3	Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Policies Implementation page 52</p> <p>D1.3 When developing the scheme’s design, careful consideration should be given to security features so that they do not onerously impact on opportunities for creating quality public realm, including seating, shelter and greenery which contribute to the promotion of healthy, active lifestyles and social integration.</p> <p>Where anti-terrorism features are required, they should be considered from the outset as part of the wider landscape design and follow the latest design guidance published by the National Protective Security Authority (formerly the Centre for the Protection of National Infrastructure). Secured by Design accreditation for the physical security features for buildings will be expectedfor all major developments (i.e. over 10 residential units and/or 1000sqm of non-residential uses). Developments should aim to achieve Silver Award level. Early engagement with the Metropolitan Police Service is encouraged to ensure the proposal can meet this level of accreditation.</p>		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/039	Design	D1 Design Standards														Support overall aims and aspirations of the Policy.		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/040	Design	D1 Design Standards														<p>[1. All developments should have regard to the Newham Characterisation Study (2024) and any further, relevant Council-led design guidance and/ or code and apply the following qualities of good design where applicable;</p> <p>h. Design facades with a coherent rhythm of vertical elements (entrances, windows, balconies, building breaks) and clearly identifiable horizontal elements (bottom, middle and top.)</p> <p>Delete: Policy as worded too prescriptive and such an approach may not always respond to local context.</p>		This wording change is not supported. We did not consider this change to be necessary as the design criteria set in by this part is a recognised best-practice (See for example National Design Guide, Identity chapter) and forms part of the recommendations of the Characterisation Study (see 9.2.1 Provide local uses that support well-connected neighbourhoods, and 9.4.3 Positive ground floor conditions). Coherent rhythm does not mean symmetry, sameness or overly simple repetition of frontage elements, and there is scope for a range of architectural solutions that would meet this criteria. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/009	Design	D1 Design Standards						Blank	No						Blank	<p>SEGRO reiterate the representations made to the Regulation 18 version of the Local Plan, specifically points 3(b) of the representations [see Appended – Regulation 18 Draft Local Plan SEGRO response] which raises concerns over application of the policy to ‘all developments.’</p>		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to {insert explanation of purpose of the change from the reg 18 consultation response}. The Council’s response has not changed

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Reg19-E-173	L&Q		Reg19-E-173/011	Design	D1 Design Standards					page 50									We are concerned by the text under ‘Planning Obligations’ on page 50, which requires the retention of the planning stage architect to completion stage in some instances. This is would lead to a lack of competition when tendering building contracts for the development, and may subsequently cause an impact on the overall viability of the development. For the same reasons, it would also be contrary to our procurement procedure. Additionally, L&Q often seek to appoint a range of architectural practices on multiphase projects in order to introduce a more diverse range of design input. This is particularly relevant to estate regeneration, where we work closely with residents and believe co-design is an important part of the delivery process. We suggest that the supporting text is amended so that a change in architect is allowed provided this is agreed in writing by the Council.	Suggested amended wording: ‘Retention of architect, or architect oversight, to project completion will be secured where it is important to preserve the vision of the original masterplanned design quality in phased developments, unless otherwise agreed in writing by the Council ”	A change to this policy approach has not been made. The Council considers the policy approach to be justified, as there may be circumstances where it is reasonable to secure continued oversight of the original architect in order to ensure delivery. This approach has worked effectively as part of the existing Newham Local Plan, and is in line with the London Plan (see D4, implementation para 3.4.12).

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Reg19-E-178	Royal Docks		Reg19-E-178/019	Design	D1 Design Standards			D1.4			Blank	Blank						Blank	<p>[Meanwhile Use: We suggest an alternative approach on large strategic sites. In those instances, supported by an appropriate strategy, we feel that meanwhile uses should be allowed for up to 10 years rather than 5 years. Our experience of large sites indicates that multi-phase schemes can provide longer meanwhile uses which could, with certainty over tenure, be better, larger, and have a greater impact with a 10-year planning consent. Meanwhile uses are challenging to make commercially viable and enabling a pay-back over a longer period will enable operators to more ambitious in their proposals and deliver better projects. In addition, a ten-year temporary consent could be renewed where the Council felt the landowner had a reasonable justification as to why there were delays in the main scheme coming forward.]</p> <p>Detailed Comments Schedule: The aspiration for high quality design for temporary buildings is supported but this should reflect the realities of viability of temporary use. These challenges can be mitigated by increasing temporary planning consents for meanwhile use as set out above.</p>		<p>The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the policy provides a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and clear and has therefore made the following wording change to the implementation section of policy D1.4, which is included in the modification table.</p> <p>Temporary buildings may display a transient materiality, but the quality of the overall design should remain of a high standard. The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe of the development. Meeting highest possible accessibility standards, as set out in the implementation text of part 1 of this policy (Social, ecological and physical integration subsection), will be particularly important when the building is intended for public access or primarily services a section of the population with special needs.</p> <p>[insert space to start new paragraph] The Design and Access Statement should provide information on the lifespan of materials used, including maintenance considerations, accounting for the possibility that the temporary use may persist for longer than three years. This detail will also need to be provided in support of applications to extend temporary permissions, including where the original permission pre-dates this Plan or where cumulatively the development would persist for longer than three years. This is to ensure that the quality of development is suitable for the intended duration. Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale.</p>

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Reg19-E-178	Royal Docks		Reg19-E-178/020	Design	D1 Design Standards					D1.4	Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.</p> <p>Detailed Comments Schedule: The aspiration for high quality design for temporary buildings is supported but this should reflect the realities of viability of temporary use. These challenges can be mitigated by increasing temporary planning consents for meanwhile use as set out above.]</p> <p>As above</p>		<p>The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the policy provides a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and clear and has therefore made the following wording change to the implementation section of policy D1.4, which is included in the modification table.</p> <p>Temporary buildings may display a transient materiality, but the quality of the overall design should remain of a high standard. The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe of the development. Meeting highest possible accessibility standards, as set out in the implementation text of part 1 of this policy (Social, ecological and physical integration subsection), will be particularly important when the building is intended for public access or primarily services a section of the population with special needs.</p> <p>[insert space to start new paragraph] The Design and Access Statement should provide information on the lifespan of materials used, including maintenance considerations, accounting for the possibility that the temporary use may persist for longer than three years. This detail will also need to be provided in support of applications to extend temporary permissions, including where the original permission pre-dates this Plan or where cumulatively the development would persist for longer than three years. This is to ensure that the quality of development is suitable for the intended duration. Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale.</p>

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/006	Design	D1 Design Standards														<div>Design</div> <div>Policy D1: Design standards Hadley supports the delivery of high-quality developments which are well-designed and promote health and wellbeing of communities. Hadley agrees with the changes made in response to earlier comments regarding the flexibility to the location of plant equipment and retention of architects. With these changes, the policy is less prescriptive and enables a design-led approach to optimise use of land.</div>		<div>Support noted. However this policy approach also received comments from the Council's Environmental Health team which raised concerns regarding the clarity of the policy's approach in relation to the design of combustion flues.</div> <div>In light of these comments, the Council recognises the importance of ensuring the Plan is clear, consistent and effective and therefore proposes the following modification, which is included in the modifications table.</div> <div>Mechanical and electrical plant (excluding solar panels) should be satisfactorily integrated into the form and design of the building. Where excavation takes place, such plant should be located below ground. If separated from the main building, it should be enclosed and integrated with the landscaping scheme to protect the appearance of the building and the street scene, and avoid being overbearing on neighbouring uses, with careful attention to not generate extensive inactive frontages at ground level. Where combustion flues are necessary, having regard to Local Plan Policy Policies CE2 and CE6, these should normally terminate above the roof height of the tallest building in the development and the immediately surrounding area to ensure maximum dispersion of pollutants. Where this is not possible, alternative measures to prevent nuisance fumes entering nearby buildings should be agreed by the Council.</div>

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Reg19-E-191	University College London	Deloitte	Reg19-E-191/005	Design	D1 Design Standards														UCL supports the aim of draft Policy D1 to achieve good quality design and a high standard of placemaking, sensitive to the surrounding context, and in the Regulation 19 amendments to the draft policy, welcomes the recognition that in applying design quality standards, some temporary developments will be in place for longer than a year. The Regulation 19 version of the draft Local Plan now effectively notes that the application of such standards will be expected for temporary development proposed for longer than three years.	However, whilst this amendment is welcomed, it is considered that the draft policy should provide greater clarity on how to approach applying relevant policy to development which is still temporary, but proposed for periods longer than three years. This would reflect the temporary consents likely to be seen at UCL East, including the aforementioned Pool Street East development, and in other examples where phased consents cover longer timescales. UCL also considers that in referencing welcoming buildings and spaces, Policy D1 should also cite the need for development to strive towards design which meets the relevant access and inclusion requirements.	<p>The objective of this policy is to provide a suitable balance between offering planning flexibility for temporary buildings/structures and securing long term quality development in the borough.</p> <p>However, the Council recognises the importance of ensuring the Plan is consistent and clear and has therefore made the following wording change to the implementation section of policy D1.4, which is included in the modification table.</p> <p>Temporary buildings may display a transient materiality, but the quality of the overall design should remain of a high standard. The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe of the development. Meeting highest possible accessibility standards, as set out in the implementation text of part 1 of this policy (Social, ecological and physical integration subsection), will be particularly important when the building is intended for public access or primarily services a section of the population with special needs.</p> <p>[insert space to start new paragraph] The Design and Access Statement should provide information on the lifespan of materials used, including maintenance considerations, accounting for the possibility that the temporary use may persist for longer than three years. This detail will also need to be provided in support of applications to extend temporary permissions, including where the original permission pre-dates this Plan or where cumulatively the development would persist for longer than three years. This is to ensure that the quality of development is suitable for the intended duration. Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale.</p>
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/023	Design	D1 Design Standards														Policy D1: Design standards 4.3 St William welcomes the updates made to Policy D1 in response to comments received to the Regulation 18 consultation draft. St William supports the principles outlined in Policy D1.	[Appendix 12: General Policies – Suggested amendments]	Support noted.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/024	Design	D1 Design Standards										No				4.4 Supporting text to this policy (page 50) continues to make reference to securing the retention of architect, or architect oversight, to project completion. It is welcomed that this is no longer included within the policy itself however St William wishes to reiterate previous comments which raised concern with this requirement. 4.5 Whilst St William acknowledge the importance of maintaining design quality in a development, a requirement to retain the original architect through to completion is onerous and extends beyond the reach of planning. Sites in particular that are large or multi-phased are less likely to be able to adhere to this and an applicant should not be restricted in this regard.		A change to this policy approach has not been made. The Council considers the policy approach to be justified, as there may be circumstances where it is reasonable to secure continued oversight of the original architect in order to ensure delivery. This approach has worked effectively as part of the existing Newham Local Plan, and is in line with the London Plan (see D4, implementation para 3.4.12).
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/028	Design	D1 Design Standards														The policy is generally supported especially that all developments should enhance the existing positive elements of local character and carefully consider opportunities to improve less successful urban forms, movement barriers and other local challenges. However, TSP disagree that all major developments should achieve a Secured by Design accreditation. If applicants have organised meetings with the Metropolitan Police for their feedback, evidence of this should suffice.	A requirement to submit details of Secured by Design measures, but not achieve accreditation, would be supported.	<p>The change you have suggested has not resulted in a change. We did not consider this change to be necessary as the policy requirement for Secured by Design accreditation is carried forward from the existing Local Plan and has been effective in securing the delivery of safety measures, which are a key element of creating quality liveable neighbourhoods.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However this policy approach also received comments from the Metropolitan Police Service which raised concerns regarding specifying a particular level of accreditation.</p> <p>However, the Council recognises the importance of ensuring the Plan is effective and has therefore made the following wording change, which is included in the modification table.</p>
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/05	Design	D1 Design Standards			1(i)											Design Policy D1: Design standards Ballymore supports the delivery of high quality developments which are welcoming and well-integrated socially and physically into their neighbourhoods, this is something Ballymore strive to achieve across all their sites. Previously, concerns were raised over the prescriptive nature of some of the requirements of this draft policy, namely Part 1(i) of the Regulation 18 plan requiring plant to be located below ground, and where this would not be feasible, to be satisfactorily integrated into the form and design of the roof. We note this has been amended to state that mechanical and electrical plant should be integrated 'into the form and design of the building, or screened and integrated into the landscaping' allowing greater flexibility, which we support.		Support noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/06	Design	D1 Design Standards			5											Previously, Ballymore objected to Part 5 of this policy in the Regulation 18 plan, which required retention of the original scheme architects through to completion of a development. It is noted this is no longer stipulated in the Regulation 19 plan, which we support.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/014	Design	D1 Design Standards														Draft Policy D1: Design Standards The general requirements of the policy and the high standards of design are being strived for are supported.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/015	Design	D1 Design Standards														However, specifically noting the Newham Characterisation Study (2024) at Part 1 raises questions as to the place that other important design guidance has in the decision making process and design. For example, there is a range of other SPDs/SPGs prepared by both Newham and the GLA that would be material considerations in decision making and design. As drafted, Policy D1 could be read to put the Newham Characterisation Study as the primary design document to take into account. This is unlikely to be what Newham intends. If it is, what is the justification for this approach, none appears to have been provided. Furthermore, as drafted, the reference to “council-led” design guidance and codes at Part 1 appears to diminish the role of the GLA design documents in design and decision making. Again, this is unlikely to be what Newham intends. [...] Similarly, the supporting text references a select number of design guidance documents. The risk of noting some documents but not others, in the context of how the policy and sub-text is worded, seems to give weight to some but not others. Again, this is unlikely to be what Newham intends.	We suggest that the reference to specific design documents is removed from the policy text, or at best noted as a key document (but one of many) in the sub-text. We would also suggest that the reference to “council-led” is removed entirely to avoid the confusion/conflict with GLA guidance. [...] Overall our Client would prefer to see the policy and sub-text simplified to either use generic language like “should be designed in accordance with the design guidance SPG/SPDs prevailing at the time of the application...” rather than emphasising one specific document. If one specific document is to be more important than others, then this should be explained as to why this is the case, and wording amended to make this clear but still recognising the role of the other guidance.	The Council’s objective for this policy approach is to provide locally-specific design principles that build on available best practice published from a range of sources, including by the GLA, as set out in the implementation and evidence base sections. However, the Council recognises the importance of ensuring the Plan is clear in its intention to be consistent with national and regional policies and has therefore made the following wording change to policy D1.1, which is included in the modifications table: 1. All developments should have regard to the Newham Characterisation Study (2024) and any further, relevant Council led, adopted design guidance/ code or guidance supported by the Council, and/or code and apply all of the following qualities of good design where applicable:
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/020	Design	D1 Design Standards														The general requirements of the policy appear to be sufficiently flexible with the use of phrases like “where applicable” before listing the various requirements. This is supported.		Support noted.

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Reg19-E-238	Environment Agency		Reg19-E-238/014	Design	D1 Design Standards														Policy D1: Design standards In our Reg 18 response we stated that ‘We welcome that the Council have developed a Newham Characterisation Study (2022) and support the policy principles set out. However, it is not clear how these principles are expected to contribute to climate resilience and net zero commitments contained with the Plan’. It is still not clear how these principles are expected to contribute to climate resilience and net zero commitments contained with the Plan.		As responded in the Regulation 18 Local Plan Consultation Report, we did not consider this change to be necessary as the Local Plan is applied in the round. Policy D1 provides broad design guidelines that are expected to be applied alongside the climate emergency/net-zero policies, and other policies e.g. masterplanning (BFN2) and green space (GWS1). Where there are design vs. environmental resilience trade offs to be made, these have been considered in the most appropriate thematic policy - e.g. BFN2 in relation to masterplanning for site layouts that support passively achieving climate objectives, D9 in relation to heritage assets and undertaking retrofit in line with Historic England guidance, and CE2 prioritising rooftops for solar power generation over green rooves. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-238	Environment Agency		Reg19-E-238/015	Design	D1 Design Standards														In our Reg 18 response we also stated that this policy should be improved so that it makes clearer reference to the role and requirement of green infrastructure. It does not appear that this has been done as part of the Reg 19 draft.		As responded in the Regulation 18 Local Plan Consultation Report. We did not consider this change to be necessary as part D1.1e already makes reference to the need for green infrastructure in line with policy GWS3, and the Local Plan is applied in the round. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-C-023	Bob Sharples		Reg19-C-023/003	Design	D2 Public Realm Net Gain						Yes	Yes						Yes	Sport England is pleased to see that LBN is advocating Active Design as a key reference document in D2.2.		Support noted.
Reg19-E-013	Transport for London		Reg19-E-013/013	Design	D2 Public Realm Net Gain														We welcome the changes made to the wording of D2 to refer to Active Travel Zone Assessments and to provide a link to relevant TfL guidance, confirmation that car parking space is excluded from public realm net gain and the addition of the reference to London Plan Policy T2 in the policy links.		Support noted.

Design Comments to the [full Regulation 19 Representations](#)

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/008	Design	D2 Public Realm Net Gain			D2.3 & D2.5			Blank	Blank					Blank	<p>Policy D2 – Public realm net gain Parts 3 and 5</p> <p>3. All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL).</p> <p>5. A Public Realm Management Plan should be submitted for all applications providing qualitative and quantitative public realm net gains on privately owned land. This will be implemented through legal agreement for major developments. The management plan should address:</p> <p>a. the timescale and phasing for completion of the public realm relative to the delivery of the overall site; and</p> <p>b. all maintenance and management requirements of the public realm; and</p> <p>c. for new or retained public spaces in private ownership, how the function of the space is optimised in response to the full range of activities and user types, at different times of the day and night and different times of the year, implementing the principles of the Public London Charter.</p> <p>Unite make the following comments on Parts 3 and 5 of Policy D2:</p> <p>1. Whilst public realm enhancements are broadly supported, and often explored by Unite on all their developments, the Policy should acknowledge that not all sites can deliver these works, particularly on constrained sites such as those bordered by a railway or highway. This needs to ensure that valuable floorspace is not lost which is a key requirement of ensuring the most efficient use of the land as per regional and national policy.</p> <p>2. There are wider highways and safety aspects which effect the type and nature of public realm spaces, particularly where there is high pedestrian footfall or where there are more significant anti-terrorism threats. This will impact quantitative and qualitative increases in public realm as aspects such as planters which may look more attractive may result in other highways issues.</p> <p>3. A Public Realm Management Plan can be a useful way to determine what level of public realm can be delivered, however this may be subject to input and involvement from third parties or other landowners and thus more detailed information may only be known at a later stage of the development including delivery matters.</p> <p>4. There should be a clear working formula for any planning obligation to avoid significant costs, particularly if management over a period of 10 years is referenced.</p>	<p>Recommendations</p> <p>On the basis of the above comments, Unite make the following recommendation to allow for greater flexibility:</p> <ul style="list-style-type: none">• Amend the Policy to allow for the consideration of a site’s specific circumstances, encouraging such provision rather than requiring.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is already providing sufficient flexibility through asking that the contribution is proportionate, which recognises the need for site-specific and development-specific circumstances to be factored in. The policy is based on the recommendations of the Characterisation Study (Chapter 9), builds on a host of existing best practice guidance (including from the National Protective Security Authority) and aligns with the requirements of the London Plan Policy D8: Public Realm. The policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions.</p> <p>Further, improving the quality of the public realm is a key element in reaching the Council's objectives of creating people-friendly neighbourhoods and a safer, people-powered Newham.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-065	Stratford Original BID		Reg19-E-065/005	Design	D2 Public Realm Net Gain						Blank	Blank					Blank	<p>[Following our participation to two consultation events where we shared our feedback, I further submit a summary of points we discussed around the Local Plan. Most of the points do endorse Newham Local Plan Neighbourhoods/Inclusive Economy. There are some additional recommendations as expansion to existing points (i.e. Inclusive economy, J1 and active frontages). None of the following points challenge or question the soundness and legal ground of local plan review. These are as follows:]</p> <p>- Commitment to consider the relationship with</p>		<p>Support noted. This approach is already imbedded in policies D2 and HS2.9.</p>

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																			the street (public realm) for all new and retrofit work.		
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/012	Design	D2 Public Realm Net Gain			D2.1d			Blank	Blank						Blank	5) We are supportive in Policy D2: Public Realm Net Gain Section 1d (page 54) that mentions the need to “Promote a feeling of safety through good design for all times of day and night.” We support the need for good wayfinding and connectivity;		Support noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/013	Design	D2 Public Realm Net Gain			D2.1d			Blank	Blank						Blank	[5] We are supportive in Policy D2: Public Realm Net Gain Section 1d (page 54) that mentions the need to “Promote a feeling of safety through good design for all times of day and night.” We support the need for good wayfinding and connectivity;) but would urge caution in designs creating excessive permeability that can create robbery hotspots, multiple escape points for offenders and reduce overall natural and active surveillance by reducing the number of people using each route. Wide, visually open and straight routes are encouraged in design to help ensure that people have the earliest opportunity to assess how safe a route feels.		A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation section for D2.1 in relation to safety and security sets out the need to avoid unnecessary connections when designing the movement network of the site. Further, the support for Secured by Design accreditation through policy D1 will provide an additional measure to ensure adequate consideration of designing for safety. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/014	Design	D2 Public Realm Net Gain						Blank	Blank						Blank	6) We would recommend that in Policy D2: Public Realm Net Gain Section 1d that where it states “CCTV, should be included only where necessary”, it also includes immediate reference to the comments in the Planning Obligations where it states “Security and safety contributions identified as a requirement via consultation with the Newham Community Safety Team and/or the Metropolitan Police Service and where linked to the nature of the development may be required.”		A change to this policy approach has not been made. We did not consider this change to be necessary as the implementation section for D2.1 in relation to safety and security sets out the need to engage with the London Borough of Newham Community Safety Team and the Metropolitan Police Service, through which the need for CCTV, and any related planning obligations, can be identified. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/025	Design	D2 Public Realm Net Gain			D2.1			Blank	Blank						Blank	[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)] Policy D2: Public Realm Net Gain page 48 1. All new and refurbished public realm should be designed, managed and maintained to fulfil all of the below criteria: d. Promote a feeling of safety through good design for all times of day and night. Surveillance solutions, such as CCTV, should be included only where necessary.		Support noted.

Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/026	Design	D2 Public Realm Net Gain						D2.1	Blank	Blank					Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Policies Implementation pages 59-63</p> <p>D.2.1 The arrangement of buildings and other features within a development should be organised so that inclusivity and safety are promoted from the outset of the design process. Design can have a significant impact of creating environments that discourage crime and help people to feel safe. Design solutions should be optimised first and foremost before any additional security interventions are considered. Features of good design that promote safety and comfort include: imbedding the knowledge gained through local engagement (particularly with focus on under-represented groups such as women, young people, and people with disabilities); designing for multi-group activation (i.e. welcoming to and usable by a range of different demographics); good permeability and connectivity (i.e. creating choice of routes, while avoiding unnecessary connections such as back alleys); clear sight lines along key routes; adequate enclosure and natural surveillance from neighbouring buildings; and good quality context-sensitive lighting.</p> <p>The British Standards Institute’s BS 5489-1:2020 ‘Code of practice for the design of road lighting – Part 1 Lighting of roads and public amenity areas’ should be considered.</p> <p>Early engagement with London Borough of Newham Community Safety Team and the Metropolitan Police Service in relation to major schemes will identify known safety concerns in relation to the site, and any need for security infrastructure. Where CCTV is proposed, a Data Protection Impact Assessment should be undertaken and form part of the site’s Public Realm Management Plan (see Part 5 of this policy).</p> <p>Art installations (including murals): should be directed to town and local centres, along other sections of major roads that demonstrate high footfall, and in the setting of cultural or physical heritage (including known archaeological assets). Opportunities for public art in open spaces should be considered at an early stage to ensure that it is satisfactorily integrated into the design of development and applicants should work with artists and consult the local community at an early stage of design. Where possible, artists should be local to or have a connection to Newham or to East London. These should be designed and positioned so as not to obstruct pedestrian or cycle movements, and to make a positive contribution to the character of the local area, including recognition of local cultural or built heritage assets. Where works of public art are sited in the public realm, their appropriate maintenance must be secured in perpetuity.</p> <p>Creative/interactive public lighting: should be prioritised in town and local centres, along major roads with high footfall (including underpasses and bridges), along public rights of way (including along waterways) and in the setting of cultural or physical heritage where it would protect and enhance its significance. The interactive/creative lighting should ensure it complements and broadly retains lighting uniformity, coverage and consistency for longer</p>	Support noted.
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																			distances/routes. As and when any conflicts arise from the set of guidance, priority should be given to addressing inclusivity and accessibility (which includes consideration of feeling safe), while also recognising and balancing the different, sometimes conflicting needs of a range of people. The document also references the Public Realm Design Guide for Hostile Vehicle Mitigation, National Protective Security Authority for HVM considerations.		
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/041	Design	D2 Public Realm Net Gain														Policy Supported, and The Site provides an opportunity to meet these aims		Support noted.
Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/010	Design	D2 Public Realm Net Gain			D2.3			Blank	No						Blank	SEGRO reiterate the representations made to the Regulation 18 version of the Local Plan (part 3(c)) [see Appended – Regulation 18 Draft Local Plan SEGRO response], and request that contributions are only required “where justified.”		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. We did not consider your suggested wording change to be necessary as the use of the word 'proportionate' provides the necessary flexibility and allows for the negotiations process to agree best planning obligations approach in the context of each individual site. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/021	Design	D2 Public Realm Net Gain			2.d			Blank	Blank						Blank	Draft Policy D2 – Public realm next gain Draft Policy D2 seeks to ensure the delivery of high quality public realm, aligning with Berkeley Homes’ aspiration to deliver high quality spaces within their developments. Draft Policy D2 (2d) seeks to ensure the delivery of formal playspace requirements in the public realm. We consider that this requirement should be subject to site specific circumstances and only where there is opportunity to do so. The assessment of play provision within major developments must be considered fairly and against the actual requirements of planning policy and balancing all other factors such as Biodiversity Net Gain, Urban Greening Factor, SuDs strategy etc. In addition, play provision that is not within the public realm, should not be discouraged. For example, podium playspace provision within higher density development should not be prohibited because of this policy aspiration.	We therefore suggest the following amendment: In areas of deficiency of access to children’s play space, major developments that generate an over-5s child yield at ten or above are strongly encouraged to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation, taking into account site specific circumstances.	This wording change is not supported. We did not consider this change to be necessary as the policy already has been amended to provide flexibility to site-specific circumstances, as set out in our Reg 18 Consultation Report. The Green Infrastructure Study has highlighted the high level of need for playspace across the borough, and this policy is intended to support improvement of this where it is reasonable to do so, and in line with the child-friendly, inclusive design aspirations set out in policy D2.1 implementation guidance. The Council is satisfied that the Plan remains sound without the proposed changes.

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/022	Design	D2 Public Realm Net Gain			D2.3			No	Blank						Blank	<p>[Draft Policy D2 – Public realm next gain]</p> <p>Policy D2 Part 3 requires major developments to make a proportionate contribution towards public realm enhancements and maintenance beyond the site boundary and states:</p>	<p>All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL), subject to viability.</p> <p>This requirement should be informed by the financial viability of the Site as developments need to weigh the balance of other contributions and public benefits being made to ensure the deliverability of a site.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is already providing sufficient flexibility through asking that the contribution is proportionate, which recognises the need for site-specific and development-specific circumstances to be factored in. The policy is based on the recommendations of the Characterisation Study (Chapter 9), builds on a host of existing best practice guidance (including from the National Protective Security Authority) and aligns with the requirements of the London Plan Policy D8: Public Realm. The policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions.</p> <p>Further, improving the quality of the public realm is a key element in reaching the Council's objectives of creating people-friendly neighbourhoods and a safer, people-powered Newham.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/007	Design	D2 Public Realm Net Gain						No	No						No	<p>Policy D2: Public realm net gain</p> <p>Hadley supports the requirement for major residential developments to make positive qualitative contributions to the public realm and the criteria setting out how this can be done. Hadley's plans for the IQLN site incorporate public realm improvements that will maximise use of the site and help to deliver its sustainable development goals.</p> <p>Hadley agrees with the removal of the requirement for allocated sites to deliver additional public realm beyond allocation requirements as this provides certainty about requirements and enables flexibility for site specific factors.</p>		<p>Support noted.</p>

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/025	Design	D2 Public Realm Net Gain			D2.2d				No							St William supports the objectives of Policy D2 which is to ensure the delivery of high quality public realm and/or secure a public realm net gain. However, note that a number of comments made to the Regulation 18 draft have not been addressed. St William reiterates the following comments: § Part 2 (d) strongly encourages major developments (in areas of deficiency of access to children’s play space) to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation – this requirement should very much be subject to site specific circumstances and only where there is opportunity to do so. The assessment of play provision within major developments must be considered fairly and against the actual requirements of planning policy rather than any requirement to go above and beyond policy requirements. In addition, play provision that is not within the public realm for example podium playspace provision within higher density development should not be prohibited because of this policy aspiration;	[Appendix 12: General Policies – Suggested amendments] 2. All new-build developments and developments for a change of use that are either on sites with a streetfacing boundary of at least 25m, or that are major residential developments, should make positive qualitative contributions to the public realm through the following: d) in areas of deficiency of access to children’s play space, major developments that generate an over-5s child yield at ten or above are strongly encouraged to deliver part of their formal playspace requirements within the public realm, and/or provide additional formal or informal playspace in the public realm. Developments are encouraged to deliver that is over and above the floorspace requirements set out in Local Plan Policy H11 and/or the site allocation, where site specific circumstances allow;	This wording change is not supported. We did not consider this change to be necessary as the policy already has been amended to provide flexibility to site-specific circumstances, as set out in our Reg 18 Consultation Report. The Green Infrastructure Study has highlighted the high level of need for playspace across the borough, and this policy is intended to support improvement of this where it is reasonable to do so, and in line with the child-friendly, inclusive design aspirations set out in policy D2.1 implementation guidance. The Council is satisfied that the Plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/026	Design	D2 Public Realm Net Gain			D2.3				No							[St William reiterates the following comments:] § Part 3 outlines a requirement for all major developments to make a proportionate contribution towards public realm enhancement and maintenance beyond the site. As per previous comments, this must acknowledge that this contribution should be informed by the financial viability of the Site and weighed in the balance of other contributions and public benefits being made. As set out in Appendix 11 [see pg 95-101], brownfield sites and in particular former gasworks are subject to significant contamination and exceptional abnormal costs associated with their remediation, as acknowledged at footnote 59 of the London Plan and consequently any financial contributions sought from brownfield and gasworks developments must ensure they meet the relevant planning tests and have been factored into the viability of the development and considered in the round. A robust case in particular must be made for contributions to ongoing maintenance of the public realm beyond sites given the absence of ownership and control, including increasing costs associated with ongoing challenging economic conditions. St William consider that Community Infrastructure Levy should be used to cover future and maintainence costs of new public realm where this is being delivered as strategic/social infrastructure. Contributions should only be made by the developer to mitigate development impacts. 4.7 As currently drafted St William does not consider this policy to be justified and therefore fails to meet the tests of soundness in the NPPF.	[Appendix 12: General Policies – Suggested amendments] 3. All major developments referable to the Mayor of London are required to make a proportionate contribution towards public realm enhancement and maintenance beyond the site, as informed by an Active Travel Zone Assessment (TfL) and subject to the financial viability of the Site.	A change to this policy approach has not been made. We did not consider this change to be necessary as the use of the word 'proportionate' provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-197	NHS HUDU		Reg19-E-197/005	Design	D2 Public Realm Net Gain						Blank	Blank						Blank	D2 - Public Realm Net Gain HUDU welcomes the removal of a reference to a specific time span regarding management and maintenance plans.	However, a clear reference to the need for indefinite management and maintenance plans should be included.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Public Realm Management Plan condition will be a permanent requirement for any relevant approved site, which will need to be maintained in perpetuity, and subject to any changes being approved by the Council. Further, the method of calculating the maintenance cost contribution for the public realm considers the whole lifespan of the development/intervention, which aligns with your requirement. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/029	Design	D2 Public Realm Net Gain														The policy is generally supported and it is noted that the Silvertown hybrid planning application commits to a significant minimum quantum of public realm on site, resulting in an exponential increase in public realm, and supports off-site public realm enhancements in relation to the Royal Docks Corridor scheme.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/021	Design	D2 Public Realm Net Gain														Draft Policy D2: Public Realm Net GainThe broad content and ambition of policy D2 is supported. In our Client’s view it is right that major developments look beyond the site ownership boundary and consider how the development can enhance the public realm. This must though be proportionate to the scale, nature and viability of the development.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/022	Design	D2 Public Realm Net Gain			D2.2											Our Client would like to ensure that there is flexibility in this policy to encourage developers to create well designed public spaces, but also to ensure that the list of requirements at Part 2 is applied “where applicable”. The list of requirements will not be appropriate in every case, and would also introduce a significant cost to developments.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is already providing sufficient flexibility. Parts a and b provide criteria for the design process, while parts c to e are context-sensitive design recommendations. Maximising green infrastructure from development is a key objective not just for the Newham Local Plan, but also for national bodies such as the Environment Agency and Natural England, as evident from their submissions to the consultation(s). The requirement for street tree planting to be maximised is in alignment with the NPPF. Further, the policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/023	Design	D2 Public Realm Net Gain			D2.3											In addition, Part 3 then seeks financial contributions to be made. There must be flexibility in the application of the policy to ensure public realm enhancements are delivered but keeping in mind development viability. Again, it is suggested that the wording is softened to be “where applicable, major developments...” It is noted that such payments are to be proportionate to the development as a whole which is encouraged.		A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is already providing sufficient flexibility through asking that the contribution is proportionate, which recognises the need for site-specific and development-specific circumstances to be factored in. The policy is based on the recommendations of the Characterisation Study (Chapter 9), builds on a host of existing best practice guidance (including from the National Protective Security Authority) and aligns with the requirements of the London Plan Policy D8: Public Realm. The policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/024	Design	D2 Public Realm Net Gain			D2.3											We note that in the supporting text the Council suggest that the Net Present Value method is the best means of calculating cost of public contributions. Whilst supported that a method is identified which adds to transparency and clarity for developers, we question where the evidence is for that choice of method, and what alternatives have been considered? The methodology is likely to constitute a significant increase in the obligations paid which will harm overall scheme viability.	The Client would like to see the justification for this method being used and why alternatives are discounted, and also ensure that policy and subtext are suitably flexible so that a developer can either deliver the public realm scheme themselves, design it and cost it themselves and then make the equivalent contribution, and opt out of making such a contribution if scheme viability shows this to be necessary.	A change to this policy approach has not been made. We did not consider this change to be necessary as the use of the word 'proportionate' provides the necessary flexibility and allows for the negotiations process to agree best approach in the context of each individual site. The policy is deliverable as demonstrated by the Viability Assessment (2024), which did not consider this policy to result in abnormal costs, with the modest requirements being able to be incorporated within the wider allowances for Section 106 contributions. The method set out is the method that is been used by Highways team as part of planning application negotiations. Its inclusion in policy provides clarity and transparency with regards to Newham's existing approach. Further, improving the quality of the public realm is a key element in reaching the Council's objectives of creating people-friendly neighbourhoods and a safer, people-powered Newham. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-238	Environment Agency		Reg19-E-238/016	Design	D2 Public Realm Net Gain			D2.1e											Policy D2: Public realm net gain We are pleased to see that Point 1.e has been amended to also include delivering biodiversity net gain in addition to addressing urban cooling and flood risk.		Support noted.

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Reg19-E-238	Environment Agency		Reg19-E-238/017	Design	D2 Public Realm Net Gain			D2.2c											We are also pleased to see the addition of Point 2.C which states ‘maximising green infrastructure within or abutting the public realm, including street trees’. In our Reg 18 response we said that ‘under implementation section D2.2, there is an opportunity to include a new theme on green infrastructure and refer to Natural England’s Green Infrastructure Framework guidance. With the addition of Point 2.C we believe that it is even more important to include a reference to Natural England’s Green Infrastructure Framework guidance in the implementation section.		As responded in the Regulation 18 Local Plan Consultation Report, we did not consider this change to be necessary as the implementation section for this policy point directs to the green space policies, which include reference to Natural England’s Green Infrastructure Framework alongside further guidance on how green infrastructure should be considered holistically. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-007	David Gilles		Reg19-E-007/014	Design	D3 Design-led site capacity optimisation			D3.7			Blank	Blank						Blank	11 D3 P65: D3.7 The Plan should make clear that a ‘design-led’ approach is not an excuse to ramp up density or to reduce social and affordable provision. In particular it opens the door to giving developers the opportunity to ramp up development because a proposal is “Design Led”. It should be made clear that this will not be allowed. A new D8 or point should be added to the Justification stating that while proposals should be design led this of itself is not a reason for overriding the other requirements of the Plan and in particular those for social and affordable housing. Architectural and design history tells us that what is called “good design” of itself will often have adverse outcomes for residents and home owners alike, eg the industrial designs of the 1960’s and 70’s; and who determines the “good”?		A change to this policy approach has not been made. The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context, evidenced by the Characterisation Study (2024) and following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG. Part 7 of this policy does not state where or when a density of 250u/ha may be appropriate, rather it provides criteria for quality assessment where such a density is deemed acceptable. The plan is applied in the round, as relevant to the type and scale of development proposed. Therefore, policy criteria are not reproduced across policies/themes. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/042	Design	D3 Design-led site capacity optimisation														Policy broadly Supported. The policy should also look to optimise density in appropriate areas providing no negative impact upon local character, in accordance with the NPPF.	Suggested change to wording: 3. All new development and extensions should integrate with wider neighbourhood grain, scale, and massing, with scope for density and height increases where there is no negative impact upon local character in appropriate locations , and in line with Tall Buildings Policy D4.	This wording change is not supported. We did not consider this change to be necessary as the scope of this policy part is to address elements of design that affect density/intensity of land use more broadly. Making effective use of land cannot always be linked to increases in residential density, for example an increase in floorspace through a householder extension that is not resulting in a new residential unit would not increase density in the neighbourhood but could still constitute the most efficient use of land. The approach set out is consistent with the NPPF and National Design Guide. The policy part also complements policy D4, and should not duplicate requirements as the plan is applied in the round. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/011	Design	D3 Design-led site capacity optimisation						Blank	No						Blank	[Appendix 2 - Representations Part 1] East Village is an exemplar 15-minute neighbourhood in a highly accessible location with a PTAL rating of 3-6. It is the largest residential rental scheme in the UK with 2,455 homes to rent and a further 1,394 in the pipeline. As such, GL support optimising the residential capacity on highly accessible sites through a design-led approach as set out in the London Plan.	GL note that to meet housing targets (as set out by Policy H1), Part 3 of Policy D3 should include allowing buildings to exceed 100m in height where the design quality can be demonstrated and particularly where existing permission exceed 100m (as outlined below).	A change to this policy approach has not been made. We did not consider this change to be necessary as tall buildings are already addressed through policy D4 and the Plan is applied in the round. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/007	Design	D3 Design-led site capacity optimisation						Yes	Yes						Yes	Draft Policy D3: Design-led site capacity optimisation Draft Policy D3 states that: “All new-build (including mixed use) developments should apply the design-led approach, as set out in London Plan (2021) Policy D3, the relevant Local Plan Neighbourhood policies, and any relevant design guidance or code.... All new development and extensions should integrate with the wider neighbourhood grain, scale and massing. Density and height increases may be appropriate where it would respect local character and in line with Local Plan Policy D4... In areas identified as suitable for transformation of character, all developments should remain attentive to the character of their neighbourhood and wider area and help create fully integrated neighbourhoods...” Primark strongly support the objective of optimizing site capacity through design, and allow for the opportunity of appropriate height and massing through appropriate justification, and delivery of wider public benefits.		Support noted.
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/008	Design	D3 Design-led site capacity optimisation			D3.5									No		Policy D3: Design-led site capacity optimisation Hadley supports the design-led approach to designing new residential development. However, it is objects to the use of “moderate” in part 5 of the policy in describing the uplift in density, which remains in the policy despite concerns raised previously. Hadley reiterates that the proposed “moderate” wording should be removed as it is subjective and inconsistent with the London Plan which requires a design-led approach to optimising the use of land.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed. We note that the GLA have not raised any concerns with the way Newham's policy guides the application of what 'design-led' means in the specific context of the borough's built environment. The Council is satisfied that the approach is sound without the proposed modifications.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/030	Design	D3 Design-led site capacity optimisation														The draft policy is supported. It is considered that Silvertown optimises density and provides a range of dwelling types.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/025	Design	D3 Design-led site capacity optimisation														Draft Policy D3: Design-led Site Capacity Optimisation The principle of the policy which follows the design-led approach to optimising site capacity as set out in London Plan Policy D3 is supported.		Support noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/026	Design	D3 Design-led site capacity optimisation														However we consider that the policy should better explain what optimisation of a site means in practice aligning with the definition set out in London Plan Policy D3. The draft policy should be explicit that optimising site capacity means ensuring that development is of the most appropriate form and land use for the site in accordance with London Plan Policy D3 Part A.		A change to this policy approach has not been made. The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context. Policy D3 does not reproduce the London Plan (2021) policy, but provides further local criteria to ensure that local context is appropriately integrated into the design-led process. The policy was developed following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG, and the GLA have raised no concerns with regards to this policy. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/027	Design	D3 Design-led site capacity optimisation														Likewise, the draft policy should be explicit that in accordance with London Plan Policy D3 Part B higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, services, infrastructure and amenities by public transport, walking and cycling. The London requires that where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate, including expanding Opportunity Area boundaries where appropriate.		A change to this policy approach has not been made. The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context, providing a balance between making effective use of land to help meet our objectively assessed needs for a range of uses, and ensuring quality design (defined through reference to a host of best practice guidance). Policy D3 does not reproduce the London Plan (2021) policy, but provides further local criteria to ensure that local context is appropriately integrated into the design-led process. The policy was developed following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG, and the GLA have raised no concerns with regards to this policy. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/028	Design	D3 Design-led site capacity optimisation			D3.1											Our Client wishes to ensure that the policy context suitably demonstrates that development in the Borough benefits from the London Plans' design-led approach to site optimisation. This should be more clearly articulated in Part 1 of the policy		A change to this policy approach has not been made. The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context. Policy D3 does not reproduce the London Plan (2021) policy, but provides further local criteria to ensure that local context is appropriately integrated into the design-led process. The policy was developed following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG, and the GLA have raised no concerns with regards to this policy. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/029	Design	D3 Design-led site capacity optimisation			D3.5											<p>The Newham Characterisation Study (p153) identifies the Site as within an area of ‘enhancement’. Areas of enhancement are defined at p152 as to “Enhance the character and deliver a moderate uplift and intensification of built density”. This definition is reflected in draft Policy D3 part 5. Given the extant planning permission at the Site for comprehensive redevelopment to provide a building of up to 25 storeys this would not represent simply a moderate uplift and intensification of built density, and therefore identification of the Site as within an area of ‘enhancement’ is inappropriate.</p> <p>Placing the Site within an area of ‘enhancement’ is also inappropriate given the surrounding context. The Site is located along the northern side of Stratford High Street which has been transformed over recent decades with the construction of tall, modern buildings. Furthermore, the adjacent Carpenters Estate has resolution to grant outline planning permission for substantial redevelopment and densification to provide up to 2,022no. new, refurbished and replacement residential units and other uses in building heights up to a maximum of 30 storeys (LLDC ref. 22/00360/OUT), however is also included within an area of ‘enhancement’. Again, this does not represent a moderate uplift of built density. To the north of the Site is the Stratford Assembly development for which planning permission has been granted for a building of 36 storeys (LLDC ref. 21/00483FUL) within an area identified for ‘transformation’. We consider that the adjacent Stratford Assembly site and our Client’s site have equal capacity for redevelopment and growth yet they have been identified as different ‘character areas’.</p> <p>In summary, the evidence base seems to be detached from the reality on the ground. Bearing in mind extant planning permissions, the allocations and draft policies in the plan should undoubtedly encourage higher density development in this highly accessible and sustainable location.</p>	<p>Given the planning history of the Site and the existing and emerging built form context, as well as the excellent public transport accessibility and the Opportunity Area designation, evidently the Site is located within an area of ‘transformation’ and our Client recommends that the Site should be identified as such</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the assessment of character is justified by the evidence provided by the Newham Characterisation Study (2024), which looked broadly at local existing and emerging built form, and in line with GLA methodology published in the Characterisation and Growth Strategy LPG. This assessment does not impact on the delivery of extant planning permissions, which are guided by the approved conditions. Where a new planning permission is sought, the policy implementation provides flexibility by setting out information on the process by which the character area a site is attributed to may be altered in agreement with the Council.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/033	Design	D3 Design-led site capacity optimisation															<p>In relation to this, the definition of ‘transformation’ and ‘enhancement’ areas must be more clearly defined to clearly set out the type and scale of development that will be expected in these areas.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as policy parts 4 to 6 of this policy already provide the additional details you have requested. The policy is necessarily flexible, as it addresses broad parameters across large parts of the borough. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/034	Design	D3 Design-led site capacity optimisation														Notwithstanding, we question the emphasis placed on density and character by draft Policy D3. The primary driver of new development should be the design-led approach to site capacity and optimisation, and this should be made explicitly clear in the policy wording. This point is emphasised further given that paragraph 130 of the NPPF which discusses character and density is proposed to be deleted.		<p>A change to this policy approach has not been made.</p> <p>The Council considers that we have adopted an appropriate framework for what 'design-led' means in the Newham context. Policy D3 does not reproduce the London Plan (2021) policy, but provides further local criteria to ensure that local context is appropriately integrated into the design-led process. The policy was developed following the process guidance set out in the GLA's Characterisation and Growth Strategy LPG, and the GLA have raised no concerns with regards to this policy.</p> <p>The Local Plan will be assessed on the basis of the NPPF (2023). Notwithstanding, the NPPF continues reference the National Design Guidance and the National Model Design Code, both of which attribute importance to development demonstrating a positive contribution to the built environment context of the site.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-007	David Gilles		Reg19-E-007/011	Design	D4 Tall buildings						Blank	Blank						Blank	<p>On a related matter and where discussing tall buildings P51 of the Report on Consultation Appendix 7 makes the quite breathtakingly wrong assertion that: “Tall buildings are key to deliver the much needed homes and the emerging Local Plan has identified suitable locations for tall building developments and the maximum heights that could be acceptable in these locations.” This statement is plain wrong. See eg Neave Brown’s now listed Alexandra Road Estate in Camden which “stretches over a quarter mile and houses 1,660 residents in 520 units. The 16.3-acre site contains three housing blocks, two pedestrian streets, public park, retail, school, and community center. Completed in 1979, the project was part of a major building program for new models of dense, social housing in the Camden Borough of London. Unlike the reductive post-war typologies of towers and slabs, Alexandra Road is a radical reinterpretation of traditional English housing and urbanism.” [footnote: See eg https://www.studiozhan.com/the-brilliance-of-alexandra-road] The accuracy of the text on Design/Tall Buildings in the R19D should be reviewed to remove inaccuracies of this sort. Why do Newham’s Planners want more of “the reductive post war typologies of towers and slabs” —witness Silvertown way today.</p> <p>The Council should commission a study of the need for tall blocks as set out in the Plan as opposed to the high density lower rise housing built elsewhere in the UK and Western Europe. Newham is in danger of creating the new Ronan Points or Robin Hood Gardens of the 2030’s, 40’s or 50’s.</p> <p>Further comment may also return to the issue of high rise more generally where it appears that the provisions of the London Plan re high rise have over ridden the very reasonable objections to it raised by residents in consultation on the Regulation 18 Draft. Given the points just made above it would not be impossible for Newham to develop a design ethos around high density as defined in the R19D which also avoided the need for high rise. However, given the paucity of good housing design in Newham since its inception as a Borough in 1964 the omens are not good for such a development.</p>		<p>Comment noted.</p> <p>The Council acknowledges the concern in relation to post war high density developments which sometimes have demonstrated to be unsuccessfully delivered or managed. However, following the introduction of housing design and sustainability standards set out at national and regional level and relevant Supplementary Planning Guidance, the housing design quality has improved in the past decades.</p> <p>Although we agree with your view that high density development could be delivered with different typologies, as stated in London Plan supporting text 3.91 and in Local Plan justification text 3.50, tall buildings in the right locations can help supporting growth.</p> <p>In line with London Plan policy D9, the Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development based on assessment of existing height, proximity to public transport, impact on open space and heritage assets.</p> <p>The Council consider the policy to be positively prepared and justified because it is supported by detailed and comprehensive evidence base documents: Newham Characterisation Study (2024) and Tall Building Annex (2024).</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provides the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Therefore, the Council considers that we have adopted an appropriate balance between optimising the use of land and meeting our objectively assessed need of housing.</p> <p>The design quality of tall buildings and their relationship with the sensitive context, whether low rise or heritage assets, will be addressed through clauses 3 and 4 and through a range of policies in the Local Plan, including co-design masterplanning, homes and design policies.</p> <p>The Council is satisfied that the policy is sound.</p>

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Reg19-E-007	David Gilles		Reg19-E-007/053	Design	D4 Tall buildings						Blank	Blank						Blank	<p>[Appendix 4 - email dated 8th September 2024]</p> <p>Finally, where discussing tall buildings P51 of the Report on Consultation Appendix 7 states that: <i>“Tall buildings are key to deliver the much needed homes and the emerging Local Plan has identified suitable locations for tall building developments and the maximum heights that could be acceptable in these locations.”</i></p> <p>What is academic or practical justification for this statement?</p> <p>[Response by Jane Custance was attached as Appendix 5]</p>		<p>Comment noted.</p> <p>The Council acknowledges the concern in relation to post war high density developments which sometimes have demonstrated to be unsuccessfully delivered or managed. However, following the introduction of housing design and sustainability standards set out at national and regional level and relevant Supplementary Planning Guidance, the housing design quality has improved in the past decades.</p> <p>Although we agree with your view that high density development could be delivered with different typologies, as stated in London Plan supporting text 3.91 and in Local Plan justification text 3.50, tall buildings in the right locations can help supporting growth.</p> <p>In line with London Plan policy D9, the Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development based on assessment of existing height, proximity to public transport, impact on open space and heritage assets.</p> <p>The Council consider the policy to be positively prepared and justified because it is supported by detailed and comprehensive evidence base documents: Newham Characterisation Study (2024) and Tall Building Annex (2024).</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provides the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Therefore, the Council considers that we have adopted an appropriate balance between optimising the use of land and meeting our objectively assessed need of housing.</p> <p>The design quality of tall buildings and their relationship with the sensitive context, whether low rise or heritage assets, will be addressed through clauses 3 and 4 and through a range of policies in the Local Plan, including co-design masterplanning, homes and design policies.</p> <p>The Council is satisfied that the policy is sound.</p>
Reg19-E-015	Greater London Authority		Reg19-E-015/021	Design	D4 Tall buildings			1											<p>Tall buildings</p> <p>The draft Plan’s proposed definition of a tall building meets the requirements of Policy D9A and sets it at 21m.</p>		<p>Support noted.</p>

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Reg19-E-015	Greater London Authority		Reg19-E-015/022	Design	D4 Tall buildings														<p>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.</p> <p>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.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan policy D9, which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>The Council also considers that the methodology used to identify suitable locations and height for tall buildings, included in Newham Characterisation Study (2024) and Tall Building Annex (2024), complies with the Characterisation and Growth Strategy LPG.</p> <p>In relation to your suggestion for using 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 it.</p> <p>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 low-rise context or historic asset.</p> <p>Therefore, we consider that defining maximum heights, which are supported by a comprehensive evidence base and an evaluation that already addresses design-led approach and optimisation considerations, meets the requirements of the London Plan and helps manage tall building developments at pre-application stage, giving a clear direction of expectation.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-015	Greater London Authority		Reg19-E-015/023	Design	D4 Tall buildings														There are two strategic LVMF views that intersect with the borough, these should be included in the borough’s Policies Map and within the draft Plan to provide clarity.		<p>The Council acknowledges there are two strategic LVMF views that intersect with the borough. The Richmond to St Pauls 9A.1 protected vista is already referenced in the TBZ19: Stratford Central and TBZ20: Chobham Manor / East Village, and implementation text D4.3 adequately addresses the need to consider any visual impact on any of the LVMF views. There are no Tall Building Zones or site allocations within the background of the linear view 8A.1 Westminster Pier to St. Paul's Cathedral. Therefore, we don't consider it necessary to specifically reference the linear vista 8A.1 in the Tall Building Policy.</p> <p>However, the Council recognises the importance of ensuring the Plan is accurate and has therefore made the following change: [Westminster Pier to St Paul's Cathedral 8A.1 and Richmond to St Pauls 9A.1 protected vistas will be added in the Policies Map for clarity] which is included in the modification table.</p>
Reg19-E-033	Thames Water		Reg19-E-033/017	Design	D4 Tall buildings			TBZ5: Gallions Reach			Blank	Blank		No	No			Blank	<p>Beckton STW is located in an area where the maximum height allowance 32m (TBZ5: Gallions Reach). There are existing buildings within Beckton STW that have flue stacks that exceed this height. For example, Beckton STW ESDF heating building flue stack is 48m AOD and the Beckton STW ESDF ventilation exhaust stack is 35m AOD.</p> <p>[see extracted map]</p> <p>Policy D4 and the accompanying Local Plan proposals map designation should be amended to either have Beckton STW within its own ‘tall building’ designation or for TBZ5 to be amended to refer to Beckton STW to recognise that fuel stacks and other related structures at Beckton STW will exceed 30m.</p> <p>Draft Policy D4 is not sound (justified or effective) as it does not reflect an appropriate or deliverable strategy for Beckton STW, which is located within TBZ5 (as depicted on the Draft Newham Local Plan Regulation 19 (2024) – Proposal Map). Zone TBZ5 and Policy D4, does not take account of evidence that there are buildings within Beckton STW, which for operational reasons, have structures attached to buildings i.e. flue stacks which exceed 32m.</p> <p>Policy D4, is therefore unnecessarily restrictive in terms of future development at Beckton STW which may to exceed 32m.</p>	<p>The policy and designation must be amended to either include Beckton STW within its own ‘tall building’ designation or for TBZ5 to be amended to refer to Beckton STW to recognise that fuel stacks and other related structures will exceed 32m.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared, justified and effective.</p> <p>Beckton Riverside Strategic Industrial Location (SIL) has been included in the TBZ5: Gallions Reach at Regulation 18 as part of the Tall Buildings review to recognise the suitability of the site for tall building developments and its industrial intensification opportunity in line with Policy J1 and J2 whilst preserving the spatial hierarchy aspiration for the borough.</p> <p>We acknowledge that the Beckton Treatment Sewage Work (BTSW) includes elements at greater heights than the heights allowed within the tall building zone designation in the submission plan.</p> <p>However, we are not aware of any future development that won’t be enabled to come forward within the proposed designation. The Council is satisfied that the plan is sound without the proposed changes.</p>

Reg19-E-034	Unite Group Plc	ROK Planning	Reg19-E-034/009	Design	D4 Tall buildings			2				Blank	Blank				Blank	<p>Policy D4 – Tall Buildings Part 2 and associated table</p> <p>2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below.</p> <p>Unite make the following comments on Part 2 of Policy D4:</p> <p>1. Unite support the consideration of areas suitable for tall buildings. Tall buildings allow for vertical development and thus optimizing land use which is essential for the growing student population across London. This is especially beneficial in densely student populated areas where available land is scarce. Tall buildings allow for efficient land use, accommodating a larger number of students in a relatively small area. This promotes higher population density, creating a dynamic and vibrant student community. Well-designed student accommodation buildings can contribute to the aesthetic appeal of the cityscape, creating a distinctive skyline. This can enhance the overall attractiveness of the educational district.</p> <p>2. In particular, Unite support the designation of Stratford Central as a Tall Building Zone, and the acknowledgement that landmark buildings would be appropriate adjacent to the station.</p> <p>3. However, an element of flexibility should be built into this Policy so that it can allow taller building outside designated areas in certain circumstances as well as for tall buildings outside of the recommended prevailing height ranges where appropriate. Unite question the inclusion of prescriptive storey heights on the basis of the following factors:</p> <p>- Storey heights can vary substantially for various uses depending on floor to ceiling heights. - A blanket height will result in all development being the same height or very similar. - The assessment of a tall building should be based on contextual analysis. - Existing sites have varying heights already established by planning permission.</p> <p>4. A more flexible approach would allow for the establishment of tall student accommodation buildings in locations that are closer to educational institutions. This is essential for providing convenient access to campuses, reducing commuting times, and enhancing the overall student experience. Furthermore, allowing tall building development outside designated areas enables better integration of student housing with on-campus facilities, academic buildings, and recreational spaces. This promotes a seamless connection between living and learning environments. Additionally, student housing demand can vary across different parts of a city. A flexible approach allows for the development of tall buildings in areas where there is a specific need for student accommodation, addressing local housing demands effectively.</p> <p>5. Wider issues and the requirements set out in London Plan policy D9 including visual impact, functional impact, environmental impact and</p>	<p>Recommendations</p> <p>On the basis of the above comments, Unite make the following recommendation for greater flexibility:</p> <ul style="list-style-type: none">• The removal of set prevailing height ranges and limits for the defined areas to allow assessment on a case-by-case basis.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>
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																			cumulative impact are rigorously assessed within any planning application for a tall building to ensure its suitability for its location. Consequently, fixed limits on building heights should not be pre-set in Policy as their suitability will be considered on a site-by-site basis through supporting technical reports as well as attendance at Design Review Panels.		
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/026	Design	D4 Tall buildings			TBZ13: Canning Town											As noted above, regarding draft Policy N4.SA1, we maintain the view that greater flexibility should be awarded to location of tall buildings, specifically within site allocations. While our Client is supportive of Policy D4 (Tall Buildings) in that the height of tall buildings should be proportionate to their role within the local and wider context, it is for the Development Management process and through a design-led approach to determine the most appropriate form of design for individual sites.		The Council considers the policy to be in conformity with London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. In line with London Plan policies D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council considers that this policy approach is sound.

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Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/027	Design	D4 Tall buildings												No		It is essential to consider that London Plan Policy D9 (Tall Buildings) states that tall buildings have a key role in facilitating regeneration opportunities and future growth. It is considered that in order to effectively deliver regeneration through provision of new homes within site allocations and be consistent within the regeneration objectives of tall buildings within the London Plan and particularly brownfield sites such as that found at Beckton Arms Policy D4 should afford greater flexibility to tall buildings within site allocations		We disagree with your view that the site allocation’s design principles are overly restrictive. The Council considers the policy to be in conformity with London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Furthermore, the Council disagrees with your view that the policy contradicts the Plan's objectives as the site’s capacity for growth has already been considered in the assessment for suitable locations for tall buildings. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-045	Beckton Development Limited	Savills	Reg19-E-045/028	Design	D4 Tall buildings	N4.SA1 Canning Town East		TBZ13: Canning Town											Table 1, Tall Building Zones sets out the ‘Height Range Maximum’ figures for each Tall Building Zone, in relation to the application site at Beckton Arms, Tall Building Zone TBZ13 (Canning Town), states the Height Range Maximum as: 50m (c16 storeys) and 40m (c13 storeys), 60m, (c20 storeys) and 100m (c33 storeys) in the defined areas. This Height Range Maximum figure is difficult to fully understand due to the variation in suggested heights. This difficulty in understanding policy is reiterated in the Local Plan Reg 19 Policies Map (2024). Figure 1 [Figure 1 – Extract of Regulation 19 Draft Policy Map Section] shows the draft Policy Map in relation to the Site outlined in yellow. It is evident from the map extract at Figure 1 that the Site is bound within multiple different height allocations, making it unclear to understand which Tall Building Zone the Site is encapsulated within. This is consistent throughout multiple tall building zone designations in the policy map where the maximum height range is varied and does not provide definitive and easy-to use guidance to better understand building heights.	We suggest that both the draft Policy D4 and the draft Policy Map should be updated to clearly demonstrate defined tall building zones and height limits that do not overlap and are independent to one another. Making this change would ensure that both the policy and policy map are effective and deliverable in terms of allowing for additional height in specified areas.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared and effective. The Council considers that the policy map clearly illustrates that the site falls within N4.SA1 Canning Town East site allocation and within TBZ13: Canning Town. As highlighted in the Tall Building Annex (2024) ‘prevailing heights will help establish a consistent character in line with the existing and emerging surrounding context, from which taller building elements could emerge’. Tall building developments that fall within the site boundary and therefore within TBZ13: Canning Town, should be developed within the prevailing heights (above 21m and below 32m) and 50m maximum height parameters. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/013	Design	D4 Tall buildings			1			No	No				No	No	Blank	<p>3. Draft Local Plan (Part 1) – Representations</p> <p>A Page 70 – Policy D4: Tall Buildings</p> <p>Objection:</p> <ul style="list-style-type: none">• Contrary to the objectives of paragraph 3.9.3 of the London Plan• Contrary to paragraph 35 (a) – not justified – of the NPPF <p>Amendments required: Yes, as suggested below.</p> <p>3.1 Paragraph 3.9.3 of the London Plan explains as follows: 3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a ‘tall building’ for specific localities, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p> <p>3.2 This text recognises that tall buildings are:</p> <ul style="list-style-type: none">• Substantially taller than their surroundings; and• There will be different building heights in different localities which would adjust the definition of a ‘tall building’ in each broad location [rather than using a borough-wide application]. <p>3.3 However, Part 1 of Policy D4 defines a tall building across Newham 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). THESET Ltd is aware that page 220 of Newham’s Characterisation Study 2024 identifies the 190-194 High Street site within an area where the main datum of building height is already above 21m. This is identified in the extract below: [see extract of Tall Buidlings Map at p. 6]</p> <p>3.4 As such, any proposal for a new building(s) on the northside the High Street in Stratford (The Broadway) which is above 22m will automatically fall into the definition of a ‘tall building’ even if it is lower in height to neighbouring buildings. In this scenario, the new proposal would not be regarded to be substantially taller than its surroundings, as defined by the London Plan.</p> <p>3.5 In light of the context, THESET LTD conclude that part 1 of Policy D4, as set out on page 70 of the Draft Submission Local Plan (Regulation 19) June 2024:</p> <ul style="list-style-type: none">• Does not accord with 3.9.3 of the London Plan; nor• Does not meet the ‘justified’ test set out in paragraph 35 of the NPPF.	<p>THESET LTD’s Suggested Amendments: 3.6 THESET LTD seeks LBN’s agreement to revise draft Policy D4 by 3.7 “1. Outside of tall buildings zones, tall buildings in Newham are normally defined as those that are at or over 21, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements). In tall building zones, tall buildings are defined as those that are substantially taller than the prevailing heights identified under the heading of ‘further guidance’ in Table 1 below.”</p>	<p>This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be justified and in conformity with the London Plan. Policy D9 part A and paragraph 3.9.3 require boroughs to define what is a tall building based on local context. The GLA is supportive of our methodology and definition of tall building which meets the requirements of Policy D9 A. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-062	THESET LTD	Stantec	Reg19-E-062/016	Design	D4 Tall buildings			TBZ18: Stratford High Street			Blank	Blank			No			Blank	5 Evidence Base Documents - Representations 5.1 There are several evidence base documents to be considered. Set out below are THESET's comment on one of these documents. a) Newham's Characterisation Study 2024 Chapter 8, Page 220, Tall Buildings Illustration Support • Contrary to paragraph 35 (c) – effective – of the NPPF Amendments required: Yes, as suggested below. 4.4 THESET Ltd is aware that page 220 of Newham's Characterisation Study 2024 identifies the 190-194 High Street site within a tall building zone (up to 50m). This is identified in the extract below: [see extract of Tall Buidlings Map at p. 10] 4.5 This Site's inclusion in the 50m tall building zone is supported by THESET Ltd.		Support noted.
Reg19-E-063	University of East London	DP9	Reg19-E-063/002	Design	D4 Tall buildings						Blank	No				No		Blank	Draft Policy D4: Tall Buildings The wording of Draft Policy D4 defines tall buildings as those being at or over 21m, measured from the ground to the principal top of the building. UEL would note that there have been amendments to the wording of this draft policy since Regulation 18 consultation, including the an amendment in the technique of measurement to now no longer include measurement to the parapet. Draft Policy D4 notes that tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones', and that the height of tall buildings in any 'Tall Buildings Zone' should not exceed their respective limits set out. Part 3 of the Regulation 19 wording expresses in finer detail London Plan Policy D9, including the need to show architectural expression at all levels, provide public viewing galleries and have plans independently reviewed by panel, a new Planning Obligation section also states that free to enter publicly-accessible areas in tall buildings may be secured where in appropriate locations and in line with the policy requirements. UEL consider the wording of the draft policy to be too severe and not consistent with the objectives of positive plan-making, as set out in the NPPF, as it fails to take into account site-specific circumstances where tall buildings may be appropriate outside of designated Tall Building Zones.	Therefore, it is suggested that the policy wording is relaxed, specifically in relation to the statement that "tall buildings will only be acceptable " [own emphasis], to instead state that "tall buildings will generally be acceptable ..." [own emphasis].	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council's response has not changed.

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Reg19-E-063	University of East London	DP9	Reg19-E-063/003	Design	D4 Tall buildings						Blank	Blank						Blank	<p>[Draft Policy D4: Tall Buildings]</p> <p>UEL would also wish to promote the UEL Stratford Campus as an appropriate site for designation as a 'Tall Building Zone', having regard to the substantial site area, the existence of a building within the existing campus which would already be defined as a 'tall building' in line with the Draft Plan definition and the recent resolution to grant planning permission by the LBN Strategic Development Committee for a new tall building within the Stratford Campus adjacent to the Arthur Edwards Building demonstrating that Officers and Members have accepted that Stratford Campus as an appropriate location for tall buildings.</p>		<p>Due to the recent resolution to grant planning permission, the Council has updated its response to this comment. A change to this policy approach has not been made. We did not consider this change to be appropriate as, based on the sieving exercise undertaken to identify suitable locations for tall buildings across the borough, and due to its sensitive location in a conservation area, the site is not considered suitable to accommodate tall building developments.</p> <p>Whilst we acknowledge that consent has been granted to buildings at a greater heights of the maximum permissible heights, and that those buildings can still benefit from existing consent, this consent was permitted under the adopted Local Plan. The draft emerging Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/011	Design	D4 Tall buildings						Blank	Blank						Blank	<p>4) We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSAs:</p> <ul style="list-style-type: none">- Crowded Places- Transport Infrastructure- Class A Licenses Premises- Utilities- Storage of Hazardous Materials- Iconic Buildings and;]- Tall Buildings	<p>[An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).]</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed modification to implementation section for policy D1.3 sets out the need to engage with the Counter Terrorism Security Advisors where this has been identified as relevant. The Council considers this is the most appropriate way to address these matters in all circumstances that involve operational development.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/043	Design	D4 Tall buildings			1											<p>Comment - The London Plan (2021) (Policy D9) states Tall Buildings should be defined upon local context but should not be less than 6 storeys.</p> <p>As an Inner London Borough, Newham should be setting a higher benchmark for tall buildings to enable more efficient use of land across the Borough</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be in conformity with the London Plan policy D9 part A which requires boroughs to define what is a tall building based on local context. The GLA is supportive of our methodology and definition of tall building which meets the requirements of Policy D9 A. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/004	Design	D4 Tall buildings						Blank	No						Blank	[In general, we support the encouragement for a wide range of town centre uses to come forward in Stratford Metropolitan Centre,] but our key concerns remain that: The proposed Tall Building Zones don't reflect the parameters in the existing planning permissions at Stratford Cross, which are not only inconsistent but will also constrain the ability for growth in a highly accessible location where the Draft Local Plan is focussing growth;		The Council considers the policy to be positively prepared, justified and effective. Whilst we acknowledge that consents have been granted to the remaining plots to be developed in Stratford Cross with tall elements at greater heights than the heights allowed within the tall building zone designation, and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/015	Design	D4 Tall buildings						Blank	No						Blank	[Appendix 1 - Stratford Cross Comments on Draft Submission Local Plan Consultation (Regulation 19) Table 1 - Draft Submission Local Plan Consultataion (Regulation 19)] Stratford Cross is covered by three planning permissions informed by an approved sitewide masterplan and height strategy that was subject to multiple Quality Review Panel meetings. This proposes taller buildings along Westfield Avenue and lower buildings along the railway frontage facing East Bank. These were informed by detailed testing including daylight/sunlight, wind microclimate and TVIA. It provides a carefully balanced approach to height that was also been scrutinised by the LLDC's design panel; LLDC design officers and the LLDC planning committee. LBN were also consulted on the proposals, which are now approved. There are two proposed Tall Building Zones (TBZ) across Stratford Cross with buildings along Westfield Avenue covered by the 100m TBZ but excluding Glasshouse Gardens (Buildings S7 and S8) the remainder covered under the 60m TBZ. However, our concern is that this approach does not reflect the built and consented height context for Stratford Cross for the following reasons.		Comment noted.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/016	Design	D4 Tall buildings						Blank	No						Blank	Building S7 is located along the western end of Westfield Avenue and constructed up to 110m AoD but currently only shown in the 60m TBZ.	Accordingly, the 100m TBZ should extend to the western end of the Westfield Avenue frontage to include Building S7.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy has been misinterpreted because, as shown in the policies map, plot S7 is included in the 100m zone of the TBZ19: Stratford Central. Following further analysis undertaken at Regulation 18 and outlined in the Tall Buildings Annex (2024), Plot S7, which is already built, has already been included in the TBZ 100m at Regulation 18 to recognise the established cluster along Westfield Avenue, in line with the spatial hierarchy and objectives of the new local plan. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/017	Design	D4 Tall buildings						Blank	No						Blank	Along the railway boundary, Plot S10 is shown within the 60m TBZ but is subject to a current reserved matters application seeking approval for a building up to 80m AoD (ref: 24/00174/REM) compliant with the OPP (ref: 20/00146/OUT) but would be inconsistent with the future TBZ's.	To ensure consistency between the TBZ and the consented S10 development, either the: <ul style="list-style-type: none">▪ Plot should be included within the 100m TBZ;▪ A new 80m TBZ should be created and include Plot S10; or▪ Further guidance is provided in the Site Allocation N8.SA5 Stratford Town Centre West allowing buildings on Plot S10 to exceed the 60m TBZ where they are consistent with extant consents, or the design is supported through Design Review Panel.	A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared, justified and effective. Whilst we acknowledge that consents have been granted to the remaining plots to be developed in Stratford Cross with tall elements at greater heights than the heights allowed within the tall building zone designation, and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, the remaining plot S10 is not considered appropriate for greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration for the borough and Stratford Area. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-091	IQL Office LP	Quod	Reg19-E-091/018	Design	D4 Tall buildings						Blank	No						Blank	A Section of Building S7 is provided in [Appendix 2] , with the S10 OPP heights parameter plan included in [Appendix 3] .		Comment noted. However, the S10 OPP heights parameters included in the Appendix 3 shows a 60m maximum height parameter on plot S10, rather than 80m.

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Reg19-E-093	Bellway Homes (Thames Gateway) Limited	Savills	Reg19-E-093/009	Design	D4 Tall buildings			TBZ18: Stratford High Street			Yes	No						Yes	<p>3. Other Key Policies</p> <p>Tall Buildings</p> <p>Policy D4 of the draft Local Plan provides details of the tall building zones across the borough. Site Allocation N8.SA9 falls under Tall Building Zone TBZ18: Stratford High Street which has a maximum height range of ‘50m and 100m, 60m, 40m and 32m in the defined areas.’</p> <p>The site allocation is within a defined area of heights between 21-32m and up to 50m. Bellway supports the principle of setting out height zones, however, for reasons set out earlier, believes that their Phase 3 site is capable of delivering up to 60 metres (20 storeys).</p>		<p>The change you have suggested has not resulted in a change. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the emerging local plan and that the site could still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/004	Design	D4 Tall buildings						Blank	No						Blank	<p>Overall, GL support the draft Local Plan, but raise comments in respect of the following key areas:</p> <p>Tall Building Zones – these do not reflect the parameters and approved heights in the existing planning permissions at East Village. In our view, this makes the plan unsound because they (i) do not reflect principles that have already established by extant permissions; (ii) they do not reflect a comprehensive height strategy that has been assessed, revised and scrutinised for this part of Stratford; and (iii) heights lower than those already consented could reduce the optimisation of site capacity (particularly housing, in a strategic opportunity area, brownfield site in a highly accessible location. We are aware that other developers with sites located within the SC OPP have raised similar concerns. Collectively, Stratford City makes a significant and substantial contribution to housing, economy, open space, play space and social infrastructure (to name a few) and we urge LB Newham to heed the developers’ advice. Proposed changes do not seek an increase in principles that have already been approved. They simply state that they should be consistent – which as currently drafted, they are not;</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be positively prepared. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p>

Reg19-E-095	Get Living Plc	Quod	Reg19-E-095/012	Design	D4 Tall buildings			TBZ19: Stratford Central			Blank	No					Blank	<p>[Appendix 2 - Representations Part 1]</p> <p>Draft Policy</p> <p>Policy D4 sets maximum and prevailing heights across Stratford (Ref. TBZ19: Stratford Central). Relative to East Village, this shows a maximum height of 100m covering Plots N18/19 and a maximum height of +60m partially covering Plot N16, Plot N15, the entirety of Plot N26. A prevailing height is also set at above 21m but below 32m (7-10 storeys) for all these plots. The rest of East Village is not located within a Tall Building Zone.</p> <p>These building heights are inconsistent and at odds with the broader height strategy that has already been approved and indeed built for this part of Stratford. If this height strategy is applied in practice, it would undermine and conflict the wider height strategy in this area and could simultaneously reduce development capacity.</p> <p>Approved Heights at East Village</p> <p>As explained above, East Village is covered by the SC OPP. This is a significant permission with a lifetime of over 25 years. Key parameters (including those related to heights) have been the subject of a significant amount of assessment, review and scrutiny (with the LPA, design review panel, design officers and plethora of other stakeholders including the highway authority, GLA etc) and detailed environmental testing (beyond that provided as evidence base to the Local Plan), which has led to a finely balanced distribution of heights across not just East Village, but Stratford City as a whole.</p> <p>For example, approved Parameter Plan 7 (PP7 ‘Development Heights) (drawing ref: 118718/P-98-007-Rev G) (see [Appendix 3]) defines the maximum heights permissible across East Village.</p> <p>This states that the maximum permissible heights for Plots N18/N19 range from +120m AOD for Plot N18, +150m AOD for the southwestern part of Plot N19, and +170m AOD for the remainder of Plot N19. The recent RMA that was approved for Plots N18/19 (Ref. 23/00090/REM) permits a building up to a maximum height of up to 148m (G+39 storeys) (extract provided at [Appendix 4]).</p> <p>Plot N16 was granted permission (Ref. 23/00101/FUL) for a 18-storey building measuring approximately 71m in height with a 10-storey element to the east measuring approximately 47m in height.</p> <p>The remainder of East Village has been built out and the general prevailing heights at East Village (as per the SC OPP and as built) is 10 storeys with a gradual increase in height towards the Stratford International Station with Plots N06 and N08 (both built) extending to a maximum of 30 storeys; N16 extending to a maximum of 18 storeys; Plots N18/N19 extending to 40 storeys culminating in Manhattan Loft Gardens (built) being the tallest building extending to 42 storeys.</p> <p>Therefore, our concern is that the proposed approach under Policy D4 does not reflect the consented height context for East Village and is therefore unsound. The current wording does +not provide flexibility for increasing height on existing buildings as it restricts tall buildings to the zones identified on the policies map.</p>	<p>Proposed Changes</p> <p>GL therefore considers the plan, in its current form, to be unsound. To ensure consistency between the proposed Tall Building Zone and the consented developments, the following refinements should be incorporated:</p> <ul style="list-style-type: none">- Extend the maximum height to +150m for Plots N18/19 to reflect the approved consent (Ref. 23/00090/REM);- Extend the maximum height to +71m, for the area covering Plot N16 to reflect the approved consent (Ref. 23/00101/FUL);- Extend the Tall Building Zone and area of prevailing height to the entirety of East Village. These buildings are already built (the majority at 10-12 storeys with Plots N06 and N08 extending to a 30 storeys.	<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to include plot N18/19 in the 100m zone to recognise the role the sites have to complete the cluster around Stratford International in line with the extent permission and the spatial hierarchy and objectives of the new local plan.</p> <p>However, to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the sites can still benefit from these consents, these consents were permitted under the adopted LLDC Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p> <p>In relation to the request to include East Village within the TBZ allocation, the information you have provided have been considered. However the conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, East Village is not considered an appropriate location for increasing the height on existing buildings. The Council is satisfied that the plan is sound without the proposed changes.</p>
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																			Increasing height of existing buildings can also help achieve other policy aims such as increasing housing supply in brownfield land within highly accessible locations such as East Village.		
Reg19-E-096	Redefine Hotels Portfolio IV Ltd	Savills	Reg19-E-096/029	Design	D4 Tall buildings			4											It is also noted that draft policy D4 (Tall Buildings) provides a series of very detailed design criteria, which sets out that: 1) the footprint of tall building should help to define new green spaces and integrate the development with the existing urban pattern or establish new routes that reinstate historic urban grain; and 2) the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street; and 3) articulation and set-backs should be used to emphasise the relationship between the horizontal (street context) and the vertical (tall building), and to contribute to securing positive amenity spaces and a suitable micro-climate around the building. Proposals for tall buildings will be subject to robust assessment through the application of London Plan Policy D9, to include addressing the visual, functional, environmental and cumulative impacts and therefore we would suggest that the above seems quite onerous for the policy wording.	We would therefore advocate that the provision of such detail would be more suitable in supplementary guidance, if to be retained, rather than within the policy wording.	A change to this policy approach has not been made. We did not consider this change to be necessary as policy D4.4 seeks to support a comfortable sense of enclosure at street level and a high quality street environment in the presence of tall building developments in all circumstances. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/015	Design	D4 Tall buildings			TBZ17: Plaistow Station			Yes	No						Yes	Height, Scale and Design Policy D4 sets out the Council's objective with regards to tall buildings (defined as those at or over 21m, roughly seven storeys). S&G are supportive of Policy D4 in principle. It is noted that LBN has added in some new tall building designations. However, it is disappointing to note that the Site continues to fall outside of the tall building zone as identified under draft policy D4. This is despite the Applicant receiving positive feedback on the height of the proposed development from LBN during preapplication meetings and from the Council's Design Review Panel. The proposed development rises to 6–9 storeys so would technically constitute a 'tall building' for the purpose of draft policy D4.	S&G, therefore, strongly considers that the Site should be included within a tall building zone as defined under policy D4.	A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst the Council acknowledges that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum heights, the Site is not considered an appropriate location to accommodate greater height. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the Site is considered appropriate for a gradual transition to the low rise context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/016	Design	D4 Tall buildings			TBZ17: Plaistow Station			Yes	No			No	No	No	Yes	<p>It is noted that the Newham Characterisation Study (2022) has been updated to address feedback received during the Regulation 18 public consultation. The Characterisation Study (2024) continues to offer guidance on where and how future growth could be delivered in the borough. It is now supported by the Tall Building Annex (2024) which provides more detail on the methodology and assessment work undertaken to identify locations for tall buildings in the borough.</p> <p>Following a baseline analysis of Newham, Chapter 7 has devised areas of the borough that are to be conserved, enhanced or transformed, and also provides a tall building zone strategy map. It is noted that the suggested tall building zones broadly correspond with ‘transform’ areas. However, S&G remains certain that this a missed opportunity for areas that have the potential to be ‘enhanced’, particularly in highly sustainable locations adjacent to ‘transform’ areas, near to existing or emerging centres and defined as having a ‘low sensitivity to change’ such as the Site. The tall building zone as drafted makes the policy ineffective as it significantly reduces the capacity of the Site, conflicting with Policy D3 of the London Plan (Optimising site capacity through the design-led approach). The policy also does not align with the aims and aspiration of the London Plan Policy D9 (Tall buildings) and is not therefore in accordance with regional policy objectives. Furthermore, it does not align with Chapter 11 of the NPPF (Making effective use of land). On this basis, draft Policy D4 is inconsistent with regional and national policy objectives. Therefore, the policy is not sound as currently written.</p>		<p>The Council considers the policy to be effective and in conformity with regional and national policy requirements. In line with chapter 11 of the NPPF 2023, the plan supports effective use of land, by enabling development on brownfield sites and directing major regeneration to areas identified as to be transformed and moderate uplift in density to conserve and enhance areas, as evidenced in Newham Characterisation Study (2024). The Council considers the policy to be in conformity with London Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these location. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>London Plan policy D3 requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</p> <p>In line with London Plan policies D9 and D3, 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 already addressed design-led approach and optimisation considerations. Based on the evidence base, the site identified in an enhance area can be developed with a scheme below 21m, which is considered the most appropriate form of development to make a contribution to meeting Newham's Housing need whilst sensitively integrating with the scale and massing of the existing urban fabric. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/017	Design	D4 Tall buildings			TBZ17: Plaistow Station			Yes	No						Yes	Tall Building Zone (TBZ) 17: Plaistow is located partially within an existing Local Centre (Plaistow North Local Centre) and includes draft site allocation N9.SA1 Plaistow North (a revised boundary of site allocation S29 in Newham Local Plan (2018)). It is noted that the area of N9.SA1 within TBZ17 has reduced slightly from the Regulation 18 plan. S&G continue to encourage LBN to extend TBZ17 to include the Site given its proximity to Plaistow station, nearby tall buildings and Plaistow North’s Primary Shopping Frontage (PSF), directly opposite part of the Site. Building heights immediately surrounding the Site already reach 6 storeys. The Newham Characterisation study specifically states that the transformation area suggested could contribute to a new centre around the station, capitalising on the access to public transport. We agree with this and strongly consider that the Site falls within this definition given its location.		The Council considers the policy to be justified because is in line with the Newham Characterisation Study (2024). Chapter 07, part 2 of the study, sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density to conserve and enhance areas. As highlighted in the conserve, enhance, transform map at p.153 of the document, the site is classified as enhance area. Therefore, a mid-rise development (below 21m) is considered the most appropriate form of development to make a contribution to meeting Newham's Housing need whilst sensitively integrating with the scale and massing of the existing urban fabric. The Council is satisfied that the plan remains sound without the proposed changes.

Design Comments to the [full Regulation 19 Representations](#)

Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/018	Design	D4 Tall buildings						Yes	No					Yes	<p>Under draft Policy D4, the scheme would be considered a tall building (i.e. exceeding 21m). The approach to optimising the Site through additional height would accord with draft policy BFN1 part 2 which seeks to make the best use of land by applying a design led approach, draft Policy H1 and draft Policy D3 which seek to optimise sites. Paragraph 123 of the NPPF states that policies should set “out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”. Policy D3 of the London Plan (2021) supports the optimisation of a site’s capacity for an appropriate land use and Policy GG4 of the London Plan also seeks to “ensure more homes are delivered”.</p>	<p>It would, therefore, be prudent to include a larger tall building zone around Plaistow Station through an extension to TBZ17 to ensure that brownfield sites around the station are able to be fully optimised to take advantage of the existing public transport network. We have re-provide a plan illustrating the suggested extension to TBZ17 boundary in Annex 1.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary because the plan is in conformity with regional and national policy requirements. In line with paragraph 123 of the NPPF 2023, the plan supports effective use of land, by enabling development on brownfield sites and directing major regeneration to areas identified as to be transformed and moderate uplift in density to conserve and enhance areas, as evidenced in Newham Characterisation Study (2024). The Council considers the policy to be also in conformity with London Plan Policy D3, which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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 and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations. Whilst we acknowledge that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum heights, the Site is not considered an appropriate location to accommodate greater height. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the Site is considered appropriate for a gradual transition to the low rise context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/019	Design	D4 Tall buildings						Yes	No					Yes	<p>As noted previously, S&G has engaged in extensive pre-application discussions with LBN Officers and the DRP prior to submitting a planning application at the Site. Comprehensive townscape work was undertaken by Lichfields to establish appropriate buildings heights for the Site. The assessment work concluded that a building of up to nine storeys in height can be successfully integrated into the surrounding area and would be a positive addition to the skyline which relates well to the emerging tall building cluster and reinforces the spatial hierarchy that has increased density of</p>	<p>We therefore urge LBN to review the Plaistow character area again, particularly the Site’s suitability to be included within TBZ17 given Lichfields’ TVIA report, submitted with the recent planning application at the Site (planning portal reference PP-12710138) demonstrates that a tall building could appropriately be located at the Site.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst the Council acknowledges that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and</p>

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																			<div>development around the station. Formal pre-application feedback from LBN confirmed the proposed height is acceptable due to its proximity to other taller developments and its high PTAL rating (of 5).</div> <div>It is noted that the Townscape Assessment of Plaistow, in Section D of the Tall Building Annex (2024), includes assessment maps which show the Site classified as a location that is ‘not successful Quality’ and ‘not sensitive to change’. However, the assessment is incomplete. In comparison to the other character areas in the borough, the report does not include a scoring assessment of Plaistow (area 10), like it does for the other character areas.</div>		<div>sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</div> <div>We acknowledge that the Townscape Assessment of Plaistow, in Section D of the Tall Building Annex (2024) has not been shown in its entirety. This error is noted. However, the conclusion remains that, based on the sieving exercise to identify tall building locations and maximum heights, the Site is not considered an appropriate location to accommodate greater height. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the Site is considered appropriate for a gradual transition to the low rise context.</div> <div>The Council is satisfied that the plan remains sound without the proposed changes.</div>

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/020	Design	D4 Tall buildings						Yes	No						Yes	Additionally, we continue to consider that defining maximum building heights within specific parts of TBZs is too prescriptive for the draft Local Plan. We recognise that Policy D9 of the London Plan (2021) requires local plans to indicate appropriate heights to be set, however, these should be indicative heights subject to design and other policy considerations. The draft policy sets a maximum height which is not the intention of the London Plan (2021). Chapter 7 of Newham Characterisation Study (2022) states that the scale and height of each TBZ reflects the findings of the characterisation study. Four building height ranges are defined in TBZ17. However, it is unclear why these heights were selected because no justification is provided. S&G considers it premature to set maximum building heights before design proposals have come forward within the TBZ. At this time, this level of detail in the policy is not justified and therefore we would question whether this level of detail allows the policy to be effective.	Given the strong policy support for optimising the capacity of sites through the design process, S&G strongly urges that LBN reconsiders the wording of Policy D4 to provide greater flexibility, as adopted elsewhere in other London boroughs’ local plans, to ensure the policy effective.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective and in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/021	Design	D4 Tall buildings						Yes	No						Yes	<p>For example, Policy BD2 (Tall Buildings) in Brent's Local Plan provides greater flexibility for building heights within TBZs subject to design details. The supporting text to this policy advises that the heights identified for the TBZs:</p> <p>“indicate the heights likely to be generally acceptable to the council. This does not mean that all buildings up to these heights are automatically acceptable. Proposals will still need to be assessed in the context of other policies to ensure that they are appropriate in that location. There might however also be circumstances where the quality of design of a development and its impact on character is such that taller buildings in these locations could be shown by applicants to be acceptable.” (p. 418)</p> <p>It is surely appropriate for Local Plans to provide such flexibility given that many of the criteria on which the acceptability of a tall building is assessed cannot be satisfactorily considered at the plan making stage and can only be properly assessed at the planning application stage. For example, Newham’s prescriptive approach to the location of tall buildings and their heights does not appear to be supported by sufficiently detailed assessments of townscape, visual amenity or daylight and sunlight, and there is clearly no consideration of design quality at this stage. All of these considerations critically inform the appropriate height, scale and appearance of tall buildings. The Local Plan must not be so prescriptive and inflexible as to unduly restrict otherwise appropriate taller buildings which are demonstrably acceptable in terms of townscape, visual amenity, residential amenity etc. and can make meaningful contributions to housing delivery and wider land use objectives.</p>	<p>We would urge Newham to follow the approach of other London boroughs and promote a more balanced and flexible approach to tall buildings.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be effective and in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-100	Simpson and Goldstein	Lichfields	Reg19-E-100/022	Design	D4 Tall buildings						Yes	No						Yes	In the event that LBN decide not to expand TBZ17, S&G considers that LBN should adopt a more proportionate and nuanced approach to buildings moderately above the tall building threshold or on the periphery of a TBZ. As it stands, the policy is too binary and restrictive. There is a significant difference, for example, between a seven storey building and 30 storey tower. Under the current policy wording, both would be defined as a tall building and assessed in the same way. Instead, the policy should acknowledge that a proportionate approach is needed, reflecting a building’s height relative to its context, the site’s suitability for a taller building and design quality. A contextually appropriate, highquality ‘lower rise’ tall building, at a prominent site and in an accessible location, is not necessarily inappropriate, especially when supported by appropriate technical assessments (e.g. daylight/sunlight and townscape and visual impact). This is particularly the case where a site is located on the periphery of a TVZ, like the Site. A rigid and binary policy risks unnecessarily precluding otherwise acceptable, high-quality schemes that deliver public benefits, such as the development at Ashburton Terrace, coming forward.	On this basis, the policy should be reworded to highlight that tall buildings are targeted to TBZs. However, in other locations, lower rise tall buildings may be supported in principle, subject to their relative scale and suitable technical assessment work. This is crucial to ensuring that accessible and sustainable sites within the borough are utilised to meet Newham’s housing and employment provision targets. The Site is a prime example where the current policy wording would restrict the viable redevelopment of a vacant and redundant site within the borough, where officers and the DRP consider a building of 6-9 storeys is acceptable.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be in conformity with London Plan policy D9 part A which requires boroughs to define what is a tall building based on local context. In accordance to policy D9 part A, and based on local context analysis, Newham has defined 21m (ca. 7 storeys) as the height at which buildings become substantially taller than its surrounding. The GLA is supportive of our methodology and definition of tall building which meets the requirements of policy D9 A. More details on the methodology used to identify suitable locations and height for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Reg19-E-102	Network Rail		Reg19-E-102/017	Design	D4 Tall buildings			TBZ18: Stratford High Street			Blank	No					Blank	<p>[Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.]</p> <p><u>Height</u></p> <p>Emerging Policy D4 (Tall Buildings) sets that a tall building should be defined as those at or over 21m and that tall buildings will only be acceptable, subject to detailed design and masterplan considerations, in areas designated as ‘Tall Building Zones’. Bow Goods Yard is located within Tall Building Zone 18 which outlines a range of maximum heights from 50m and 100m, 60m, 40m and 32m in defined areas. As identified on the emerging Proposals Map, Bow Goods Yard is identified to have a maximum height of 50m, with prevailing heights to be between 21m and 32m. Network Rail consider this policy to be unsound given the immediate surrounding context. The Pudding Mill Masterplan, consented in September 2023, which is also located within Tall Building Zone 18 and has also been identified to have a maximum height on 50m, has consent granted for heights ranging from 25m – 95m. Network Rail therefore considers the proposed building heights in Tall Building Zone 18, to be unsound. In order for the policy to be found sound, the prevailing heights within this tall building zone should be increased in order to be more aligned with the surrounding context.</p> <p>The maximum height parameters submitted for the Outline Planning Application for Bow Goods Yard range from 17m – 66m, with the majority of the buildings proposed to be 35 – 41m. The planning application submitted for Bow Goods Yard is accompanied by a far more detailed Townscape and Visual Impact Assessment (TVIA) for this Site than is provided as part of evidence base accompanying the emerging Local Plan. The tallest element proposed for Bow Goods Yard is located opposite the emerging Pudding Mill Masterplan and is subservient to the tallest building at Pudding Mill. Key sensitivities, including the River Lea corridor, the Jubilee Greenway and the London Stadium and Queen Elizabeth Olympic Park, as well as daylight / sunlight and overshadowing analysis were all considered when assessing and determining the proposed building heights that would be suitable in this location. Ultimately, it was demonstrated that the building heights proposed, which are above the maximum building heights proposed by draft Policy D4, were considered to be acceptable from a townscape perspective in this location. Subsequently, for this policy to be found sound, the prevailing building heights and maximum building heights for this location should be increased to be in line with the Bow Goods Yard maximum height parameters. The prevailing building heights should range from 35 – 41m and the maximum building height should be 66m.</p> <p>Furthermore, as currently set out within emerging Policy D4, tall buildings will only be acceptably subject to detailed design and masterplan considerations and will be assessed independently by Newham Design Review Panel which Network Rail support. This will ensure that taller buildings are designed to the highest design standards and will be designed to make a positive contribution to the surrounding townscape and context and thus the emerging Policy should allow for increased maximum heights.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan positively prepared and justified. Whilst we acknowledge that consents have been granted to sites in the immediate context of Bow Goods Yard site, and that they could benefit from planning consents under the current LLDC Local Plan, those decisions are informed by the adopted LLDC Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum height and due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street is not considered appropriate to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and on TBZ18: Stratford High Street it is considered appropriate for a gradual transition from the higher cluster to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>
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Reg19-E-102	Network Rail		Reg19-E-102/021	Design	D4 Tall buildings			TBZ18: Stratford High Street			Blank	No						Blank	<p>[Outlined below are our comments pertaining to the soundness of the Council’s Regulation 19 Local Plan in relation to Bow Goods Yard.]</p> <p>[Concluding Remarks] Furthermore, the emerging Local Plan is found to be unsound in relation to the proposed maximum building heights and prevailing heights, which do not currently reflect the surrounding context of the Site.</p>	<p>Subsequently, the prevailing heights within Tall Building Zone 18 should be increased in order to be more aligned with the surrounding context, particularly Pudding Mill, and the opportunity to include taller building elements should be increased to the upper range of 100m.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan positively prepared and justified. Whilst we acknowledge that consents have been granted to sites in the immediate context of Bow Goods Yard site, and that they could benefit from planning consents under the current LLDC Local Plan, those decisions are informed by the adopted LLDC Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum height and due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street is not considered appropriate to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and on TBZ18: Stratford High Street it is considered appropriate for a gradual transition from the higher cluster to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/011	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No						Blank	<p>SEGRO reiterates the representations made to the Regulation 18 version (part 3(d)) of the Local Plan [see Appended – Regulation 18 Draft Local Plan SEGRO response] and suggest that an extra part is added to policy D4 which states tall buildings of 30-40m can be potentially appropriate in SIL, which would allow the potential for multi storey developments where appropriate.</p> <p>More specifically, SEGRO Park Canning Town (on Bidder Street) is located in an area defined in the draft plan as being appropriate for a maximum height of 32m. However, 32m is just below the typical height of a multi storey development, which are between 36 and 40m in height (for example the SEGRO V Park Building Gradn Union building and SEGRO multi storey building within the Slough Trading Estate are both 36m in height).</p> <p>The current draft maximum building heights within policy D4 therefore currently preclude multi storey developments being located in areas where the maximum height is proposed to be 32m.</p> <p>Whilst multi storey is a relatively new concept in London, given the demand for land in industrial locations this will inevitably become a more common feature across the industrial landscape. It is suggested therefore that the height restrictions are amended in such locations to allow flexibility for multistorey developments to come forward in the future.</p>		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to designate Strategic Industrial Locations as Tall Building Zones, where appropriate. The Council's response has not changed.</p>

Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/004	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<p>Policy D4 ‘Tall Buildings’</p> <p>Policy D4 and its supporting diagram (Page 79) identifies the location and extent of areas that are appropriate for tall buildings, which is defined as any building taller than 21m.</p> <p>The Tall Building Zone (TBZ13 – Canning Town) now includes all the Thameside West Site Allocation whereas the Reg 18 plan excluded the eastern section. The Thameside West land is identified as being in an area with a prevailing height of more than 21m but less than 32m (circa 7-10 storeys) and a maximum height of 50m.</p> <p>We acknowledge and welcome that the Council has amended the Tall Building Zone boundaries to include all the Thameside West land within TBZ13. However, the stated prevailing heights (between 7-10 storeys) and maximum heights (up to 50m) are inconsistent with the Hybrid Planning Permission.</p>	<p>The maximum height for TBZ13 indicated on the policies map (page 79) should be adjusted to recognise the Hybrid Planning Permission. This should be up to 100m (purple) to reflect the colors indicated in the legend that supports the tall buildings map.</p> <p>For reasons outlined in the previous section of these representations Policy D4 should be amended to align with the Thameside West Hybrid Planning Permission ensure that the plan provides suitable parameters to support the delivery of housing in accordance with the Councils housing supply trajectory forecasts.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers the policy is also in line with Policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.”</p> <p>In line with policies D9 and D3, 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. The tall buildings assessment fed into the site allocations capacity testing which provide the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note.</p> <p>While we acknowledge that Newham is unable to meet its 2021 housing target within the period of the London Plan, this is due to delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target and not due to insufficient land supply or site optimisation. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34.</p> <p>We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham’s most up-to-date housing trajectory:</p>
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LB Newham Response		[Newham will enable a net increase of between 51,425 and 53,784 53,194 and 54,976 quality residential units between 2023 and 2038.].
Proposed modifications and explanation		
Representor Comment		
Complies with Duty to Cooperate?		
Consistent with the London Plan?		
Consistent with the NPPF?		
Effective?		
Justified?		
Positively prepared?		
Sound?		
Legally Compliant?		
Implementation text		
Justification		
Clause		
Introduction		
Site allocation		
Policy		
Chapter		
Comment Reference		
Agent		
Representor		
Representation Reference		

Reg19-E-169	Silvertown Homes Ltd	DP9	Reg19-E-169/010	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<div>Conclusion and Next Steps</div> <div>SHL have significant concerns about the misalignment between the Thameside West Site Allocation and the Hybrid Planning Permission with respect to building heights [and the SIL designation].</div> <div>The building height parameters stated in the Site Allocation text and Policy D4 are significantly lower than what has been approved under the Hybrid Planning Permission and therefore would not be able to accommodate the approved quantum of homes upon which the Councils housing supply projections are predicated.</div>	<div>A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers the policy is also in line with Policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.”</div> <div>In line with policies D9 and D3, 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. The tall buildings assessment fed into the site allocations capacity testing which provide the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note.</div> <div>While we acknowledge that Newham is unable to meet its 2021 housing target within the period of the London Plan, this is due to delayed phasing of sites compared with the GLA's 2017 SHLAA, which informed Newham's London Plan 2021 housing target and not due to insufficient land supply or site optimisation. As a borough, Newham has more than enough capacity to meet the London Plan housing target, albeit because of delays to site allocation delivery, we won't be able to meet our London Plan target till 2033/34.</div> <div>We therefore consider the plan is positively prepared, seeking to meet objectively assessed need over the new plan period (albeit not within the London Plan period). Fundamentally, we consider our approach to housing delivery is both justified and effective, being based on realistic evidence of delivery rates.</div> <div>The Council is satisfied that the plan remains sound without the proposed changes.</div> <div>Notwithstanding the above, the Council recognises the importance of ensuring the Plan is justified and effective and has therefore drafted the following modification, which will be presented to the Inspector for their consideration, to ensure the housing target is based on Newham’s most up-to-date housing trajectory:</div>
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																					[Newham will enable a net increase of between 51,425 and 53,784 53,194 and 54,976 quality residential units between 2023 and 2038.].
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/023	Design	D4 Tall buildings			2			Blank	Blank						Blank	<p>Draft Policy D4: Tall Buildings</p> <p>Berkeley Homes places great emphasis on high quality design, creating bespoke masterplans which are designed in collaboration with local stakeholders and ensure each site is delivered with a design led approachresponding to the individual opportunities and constraints that exist on each site. It is acknowledged that a design process needs to take place to ensure the delivery of high quality tall buildings to allow for high quality places.</p> <p>Notwithstanding this, we raise significant concerns with regards to the overly subscriptive nature of the ‘Height Range Maximum’ in draft policy D4. Table 1: Tall Buildings identifies maximum height range within Tall Building Zones.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>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 (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/024	Design	D4 Tall buildings			TBZ15:West Ham Station			Blank	Blank						Blank	<div>[Draft Policy D4: Tall Buildings]</div> <div>TwelveTrees Park sits within TBZ15: West Ham Station, N7 Three Mills. Table 1 states that the height range maximum in this location will be: 50m (ca. 16 storeys) and 32m (ca. 10 storeys) and 100m (ca. 33 storeys) in the defined areas We consider this to be overly subscribeive and undermines the opportunity to optimise sites, impacting the delivery of homes and affordable homes within the borough. The London Plan provides a recently adopted policy basis for assessment, calling for optimisation of capacity across brownfield land, a design led approach to density, and recognising that tall buildings can be appropriate where assessed positively against the criteria set out in London Plan Policy D9 Part C.</div>		<div>The Council considers the policy to be in conformity with the London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</div> <div>The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.”</div> <div>In line with policies D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper. Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council considers that this policy approach is sound.</div>

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/025	Design	D4 Tall buildings	N7.SA1 Abbey Mills		TBZ16: Abbey Mills			Blank	Blank			No	No		Blank	<div>[Draft Policy D4: Tall Buildings]</div> <div>London Plan Policy D3 Part A states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations”. Part B states that “Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”. We consider the approach to tall buildings within Site Allocation N7.SA1: Abbey Mills to be inflexible and an inappropriate strategy for the borough to be able to encourage and deliver appropriately optimised sites. Optimising sustainable brownfield sites is a strategy that is reiterated in both London Plan Policy D3 (Optimising site capacity through the design-led approach) and paragraph 129 of the National Planning Policy Framework.</div>		<div>The Council considers the policy is in conformity with the London Plan policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</div> <div>In line with policy D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper. The Council considers that this policy approach is sound.</div>

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/026	Design	D4 Tall buildings			2			Blank	Blank						Blank	<div>[Draft Policy D4: Tall Buildings]</div> <div>London Plan Policy D9 Part B (2) states that ‘Any such locations and appropriate tall building heights should be identified on maps in Development Plans’ therefore, Local Plans have the ability to cite what height may be ‘appropriate’ in certain locations. The recommended height provisions should remain flexible, as a judgement should be made through the Development Management process in regards to what an acceptable height may be, in regards to the impact tests set out in Part C of the London Plan policy.</div>		<div>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</div> <div>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 (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.</div>

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Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/027	Design	D4 Tall buildings			2			Blank	Blank						Blank	<div>[Draft Policy D4: Tall Buildings]</div> <div>Ultimately, we maintain the view that it is for the Development Management process to determine the most appropriate form of design for individual sites. The Development Plan should aid the optimisation of suitable brownfield sites in Newham as opposed to setting a prescribed physical form of development.</div>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-170	Berkeley Homes (South East London) Limited	Savills	Reg19-E-170/028	Design	D4 Tall buildings			2			No	No		No	No			Blank	<div>Berkeley Homes consider this policy as drafted is not justified. The application of draft Policy D4 is likely to discourage development and unduly restrict LBN’s ability to deliver the wider objectives of the DSLP. The policy as drafted is also therefore not effective.</div>		<p>The Council considers the policy to be positively prepared, justified and effective for the reasons set put in the responses [Reg19-E-170/023, Reg19-E-170/024, Reg19-E-170/025, Reg19-E-170/026, Reg19-E-170/027]. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan’s requirements and, where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed.</p> <p>The Council considers that this policy approach is sound.</p>

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Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/22	Design	D4 Tall buildings		Table 1 Tall Building Zones				Yes	Yes							<p>Tall Buildings</p> <p>The Authority notes the changes to Policy D4 Tall Buildings and supports the new wording added to the guidance section of Table 1: Tall Building Zones for Canning Town (TBZ13), West Ham Station (TBZ15) and Abbey Mills (TBZ16) and corresponding design principles in the relevant site allocations Abbey Mills (N7.SA1), Twelvetrees Park and Former Bromley By Bow Gasworks (N7.SA2), Limmo site (N4.SA4) and Canning Town Riverside (N4.SA5).</p> <p>This recognises the need for tall buildings in Canning Town zone to 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, (Canning Town TBZ13).</p>		Support noted.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/23	Design	D4 Tall buildings		Table 1 Tall Building Zones	TBZ16: Abbey Mills			Yes	Yes							<p>Guidance under TBZ16 Abbey Mills recognises the need to manage the impact on heritage assets as previously raised by the Authority and now states that “Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Abbey Mills Pumping Station.”</p>		Support noted.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/24	Design	D4 Tall buildings		Table 1 Tall Building Zones	TBZ16: Abbey Mills			Yes	Yes							<p>Importantly given the Authority’s concern about the sensitivities of design and placement of new buildings in relation to the waterways and heritage assets, careful consideration must now be given to the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses (TBZ16 with reference to Abbey Mills). In this respect new guidance set out in N7.SA1 Abbey Mills is also supported as follows:</p> <p>“Development should conserve and enhance the Three Mills Conservation Area and the listed buildings in proximity of the site and their settings. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and the Grade I House Mill as set out in the Three Mills Conservation Area Appraisal and Management Guidelines.”</p>		Support noted.

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Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/25	Design	D4 Tall buildings		Table 1 Tall Building Zones	TBZ15: West Ham Station			Yes	Yes							Similar guidance regarding heritage assets and watercourses is specified for the former Bromley by Bow Gas works site (part of TBZ15 West Ham Station) this time with reference the Three Mills Conservation area, its important landmarks and key views. The Authority therefore also supports new guidance set out in N7.SA2 as follows: “Development should conserve and enhance the Three Mills Conservation Area, the listed Gasholders and the listed buildings in the proximity of the site and their settings. Height, scale and massing should conserve and enhance the character of heritage assets without detracting from important landmarks and key views, including the Grade II Abbey Mills Pumping Station, the Grade II Clock Mill and Grade I House Mill as set out in the adopted Three Mills and Conservation Area Appraisal Management Guidelines.”		Support noted.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/26	Design	D4 Tall buildings					D4.3	Yes	Yes							The changes to the wording of Policy D4 and the added detail within the Implementation text (and relevant Site Allocation design principles) clarifies how proposals for tall buildings in proximity to sensitive areas should respond to the historic environment and manage the transition between ‘conserve’ and ‘transform’ areas.		Support noted.
Reg19-E-171	Lee Valley Regional Park Authority		Reg19-E-171/27	Design	D4 Tall buildings					D4.3	Yes	Yes							Implementation text also now cross references, Policies GWS2 ‘Water Spaces’ and GWS3 ‘Biodiversity Urban Greening and Access to Nature’ which require development proposals for tall buildings to demonstrate consideration of their impact on biodiversity and existing and proposed public open space, including watercourses.		Support noted.

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Reg19-E-173	L&Q		Reg19-E-173/023	Design	D4 Tall buildings			2											As a matter of principle, L&Q is concerned that heights are identified in draft Policy D4 within the identified Tall Buildings Zones as absolute maximums. Whilst we note the wording set out at 3.9.2 of the London Plan (in support of Policy D9), London Plan Policy D3 also requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Consequently, it is considered that flexibility should be included to enable these maximum heights to be breached where a scheme delivers significant public benefits as a result.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/025	Design	D4 Tall buildings			TBZ11: Lyle Park West								No			The NPPF at Paragraph 132 states that ‘Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.’ Draft Policy D4 (and specifically in respect of Tall Building Zone ‘TBZ11: Lyle Park West’) clearly fails to achieve these requirements by virtue of the fact that the heights set out are incompatible with an extant planning permission, which is a material planning consideration.		The Council considers the plan to be positively prepared, justified, effective and in conformity with regional and national policy requirements. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. Due to other representations on the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Building Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-173	L&Q		Reg19-E-173/026	Design	D4 Tall buildings			TBZ11: Lyle Park West											Tall Building Zone ‘TBZ11: Lyle Park West’ states that prevailing heights should be between 21m and 32m (ca. 7-10 storeys), and that there is an opportunity to include tall building elements up to 40m (ca. 13 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR. However, in January 2021 planning permission was granted in respect of the north western part of the allocation site (L&Q’s ownership) for ‘Comprehensive redevelopment of site to provide residential-led, mixed-use development of 3no. blocks ranging from 12 to 20 storeys in height comprising 252 residential units (Use Class C3), and new local centre at ground level comprising 1,078sqm (GIA) of flexible commercial floorspace (Use Class A1/A2/A3/D1/D2) with associated new public realm, landscaping, car parking, cycle parking and associated works.’ (LPA ref: 19/01791/FUL). The implementation of the planning permission was confirmed in application LPA ref: 23/02432/CLE.		The Council considers the plan to be positively prepared, justified, effective and in conformity with regional and national policy requirements. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. Due to other representations on the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Building Topic Paper (2025). The Council considers that this policy approach is sound.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/027	Design	D4 Tall buildings			TBZ11: Lyle Park West											Draft Policy D4 in respect of TBZ11 also represents a reduction of development potential against the adopted site allocation S20, which highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station. The committee report for the planning permission 19/01791/FUL (at paragraph 7.2.80) makes clear that the consented heights were appropriate cognisant of the 2018 allocation and the policies of the 2021 London Plan. Paragraph 7.6.7 to 7.6.9 provides further detail, notably stating that ‘The height is appropriate in relation to the existing and emerging context and in relation to the spatial hierarchy of the area and the borough, and in relation to the scale of the street and the adjacent public space and DLR infrastructure.’ The reduction of the development potential of the allocation site is perverse given the worsening housing need, and is contrary to London Plan Policy D3, which seeks the design-led optimisation of development sites.		The Council considers the plan to be positively prepared, justified, effective and in conformity with regional and national policy requirements. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. Due to other representations on the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL. Furthermore, the spatial strategy for the Tall Building Zones and the site allocations requirements result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Building Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-173	L&Q		Reg19-E-173/029	Design	D4 Tall buildings			TBZ11: Lyle Park West											The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology: <ul style="list-style-type: none">Firstly, Figure 12 seeks to show tall buildings under construction in Newham, however this does not include the L&Q development at LPW, despite the fact that the scheme has been implemented in planning terms (LPA ref: 23/02432/CLE). This fundamentally means that the approach taken to assessing TBZ11 is flawed. In any case, a logical approach would be to identify any extant planning permissions (rather than only sites under construction). This does not appear to have been done.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan positively prepared and justified. Although the Council acknowledge that the scheme has been implemented in planning terms, it is not built yet. Therefore permitted heights have not been considered suitable parameters to define the emerging context at this point in time. More details on the methodology could be found in the Tall Building Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/030	Design	D4 Tall buildings			TBZ11: Lyle Park Wes											[The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:] • Secondly, adopted site allocation S20 highlights acceptable indicative building heights of 10 to 12 storeys and up to 18 storeys at key locations including West Silvertown DLR station. Adopted site allocations are identified at Figures 34 and 37, however no detail is provided in respect of established heights for those site allocations, and it is unclear how the existence of existing allocations has informed the study.		Site allocations and areas identified suitable for tall buildings in the adopted Local Plan were part of the criteria for the high-level assessment of suitability for tall buildings in the borough. Whilst adopted site allocations have been considered suitable for tall buildings, the height parameters have been considered on the basis of the local centre hierarchy, the level of accessibility and the prevailing height of the context. More details on the methodology could be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).
Reg19-E-173	L&Q		Reg19-E-173/031	Design	D4 Tall buildings			TBZ11: Lyle Park Wes											[The tall buildings zones designations derive from the Tall Buildings Annex Newham Characterisation Study (July 2024). However, a review of this document raises issues in the methodology taken, and the application of the methodology:] • Thirdly, TBZ11 is treated differently than the land to the west which is identified as appropriate for heights of up to 50m (with TBZ11 as suitable for 21 – 32m (7 – 10 storeys)), as shown at Figure 42 on Page 61. This approach appears to derive from Figure 26 which shows a different sensitivity rating to TBZ11 compared to the land to the west, although there does not appear to be any justification to support this. Significantly, both areas are identified at Figure 36 as having low sensitivity to change, and in the Townscape Assessment (June 2024) at Page 78 as areas ‘not sensitive to change’.		The Council acknowledges that the land within the TBZ11: Lyle Park West boundary has been identified as low sensitive to change area and, therefore, it has been considered suitable for Tall Buildings allocation. However, due to other representations on the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/032-a	Design	D4 Tall buildings			2				No		No	No	No			For the reasons set out above, it is considered that draft policy D4 (specifically TBZ11) is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.	Suggested amended wording: ‘2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below unless justified by public benefits.’	This wording change is not supported. We did not consider this change to be necessary as the Council considers the policy to be justified, effective and in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. 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. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/032-b	Design	D4 Tall buildings			Table 1 Tall Building Zones				No		No	No	No			[For the reasons set out above, it is considered that draft policy D4 (specifically TBZ11) is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.]	[Suggested amended wording: ‘2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below unless justified by public benefits.’] It is suggested that in Table 1, ‘Height Range Maximum’ is replaced with ‘Indicative Height Range Maximum’.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the policy to be in conformity with the London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. 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. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-173	L&Q		Reg19-E-173/032-c	Design	D4 Tall buildings			TBZ11: Lyle Park West				No		No	No	No			[For the reasons set out above, it is considered that draft policy D4 (specifically TBZ11) is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.]	[Suggested amended wording: ‘2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below unless justified by public benefits.’ It is suggested that in Table 1, ‘Height Range Maximum’ is replaced with ‘Indicative Height Range Maximum’.] Additionally, the evidence base which supports the tall buildings assessment should be reviewed to address the comments raised. As a minimum, TBZ11 should enable compatibility with extant consent on the L&Q site.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan positively prepared and justified. Although the Council acknowledge that the scheme has been implemented in planning terms, it is not built yet. Therefore, permitted heights have not been considered suitable parameters to define the emerging context at this point in time. More details on the methodology can be found in the Tall Building Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-173	L&Q		Reg19-E-173/032-d	Design	D4 Tall buildings			TBZ11: Lyle Park West				No		No	No	No			[For the reasons set out above, it is considered that draft policy D4 (specifically TBZ11) is unsound as (with reference to NPPF Paragraph 35) it is not justified or effective.]	<p>[Suggested amended wording: ‘2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below unless justified by public benefits.’ It is suggested that in Table 1, ‘Height Range Maximum’ is replaced with ‘Indicative Height Range Maximum’.</p> <p>Additionally, the evidence base which supports the tall buildings assessment should be reviewed to address the comments raised. As a minimum, TBZ11 should enable compatibility with extant consent on the L&Q site.]</p> <p>Suggested amended wording: ‘Indicative Height Range Maximum: 40 66m (ca. 13 20 storeys)’ Further guidance: ‘Opportunity to include tall building elements up to 40 66m (ca. 13 20 storeys) in proximity to the riverside and to mark the new Neighbourhood Parade at West Silvertown DLR</p>	<p>The Council considers the plan to be positively prepared, justified, effective and in conformity with regional and national policy requirements. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan.</p> <p>Due to other representations on the agent of change principle and based on the townscape work undertaken to support the submission Local Plan, as directed by the London Plan (2021), it was concluded that TBZ11: Lyle Park West cannot support greater heights as it would cause challenges for the delivery of Policy J1 on the adjacent SIL.</p> <p>More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Building Topic Paper (2025). The Council considers that this policy approach is sound.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/021	Design	D4 Tall buildings			TBZ6: Albert Island			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: The tall buildings level should also reflect the consented Albert Island permission.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as a change to this policy has been made at Regulation 18 following further analysis undertaken and outlined in the Tall Buildings Annex (2024). Through this analysis and, considering the emerging context at Royal Albert Wharf, it was concluded that the 40m zone could be more suitable for the TBZ6: Albert Island. The Council is satisfied that the plan is sound without the proposed changes.</p>

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/022-a	Design	D4 Tall buildings			2			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: Heights should reflect the maximum possible with the airport safeguarding limits.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared and justified because policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints and engagement on the safeguarding controls associated with the Airport’s operations will be undertaken with the London City Airport at pre-application stage. London City Airport safeguarding limit depicts a threshold for airport safeguarding analysis and it doesn’t necessary reflects the most appropriate height for a site. Therefore, the Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/022-b	Design	D4 Tall buildings			TBZ9: Royal Albert North			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>[Detailed Comments Schedule: Heights should reflect the maximum possible with the airport safeguarding limits.] Reference to the “Royal Albert Quay emerging office complex” should be deleted as it is no longer relevant.</p>		<p>Need for clarification is noted. This has been rectified by making the following wording change:</p> <p>Table 1: Tall Building Zones</p> <p>TBZ9: Royal Albert North Scale and massing should reference the emerging context of Royal Albert Wharf, the Connaught Hotels and the Royal Albert Quay emerging office complex.</p> <p>which is included in the modification table.</p>

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-178	Royal Docks		Reg19-E-178/023	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: The Thameside West consented and implemented permission should be reflected here to ensure consistency.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be positively prepared. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-178	Royal Docks		Reg19-E-178/024	Design	D4 Tall buildings			2			Blank	Blank						Blank	<p>[The comments below and in the attached schedule set out some areas where we feel amendments or additions to the Plan could further support the Council and the RDT’s work. In the attached schedule are a series of specific changes which we have organised with reference to the pages and policies of the draft.]</p> <p>Detailed Comments Schedule: The consented Royal Eden Dock (three phases) should be reflected here.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because fig 3 of the Tall Building Annex (2024) adequately shows the Royal Eden Dock height. The Council is satisfied that the plan remains sound without the proposed changes.</p>

Design Comments to the [full Regulation 19 Representations](#)

[illegible]

Design Comments to the [full Regulation 19 Representations](#)

[illegible]

Page 148 of the Characterisation Study notes that the site has a ‘Moderate Opportunity for growth’.

[Image inserted - Extract Page 148 Newham Characterisation Study]

The characterisation study’s evidence is clear that the site has a low sensitivity to change, unsuccessful built form and opportunity for growth which cumulatively mean that it meets the criteria of clause a) and should therefore be considered a suitable location for tall buildings.

‘c) Existing or planned town centres and local centres that have opportunities for densification’.

Whilst the site is not within a Town Centre or Local Centre Boundary it is on the edge of Ilford Town Centre which is outside of the Borough and therefore outside of the Characterisation Study’s scope. Ilford Town Centre contains a high number of Tall Buildings which should be taken account of when assessing suitable height on neighbouring sites like 970 Romford Road.

‘f) Locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling’.

These criteria are fully met as the site is situated along Romford Road and just outside Ilford Metropolitan Town Centre.

The site has excellent access to public transport services with PTAL rating of 6a. Ilford Station is located within 0.5 kilometres with regular service to Liverpool Street and in addition, a number of bus services run along Romford Road.

The site benefits from easy links with local facilities and shops, which provide a wide range of retail opportunities for the site to incorporate as part of the development. Of particular note, is the Sainsbury’s superstore situated approximately 400m walking distance to the east.

In summary, the Characterisation Study provides several maps which demonstrate that the 970 Romford Road site would be a prime candidate for inclusion as one of the Council’s ‘Tall Building Zones’ as it meets the following criteria in the Characterisation Study’s Methodology:

a) ‘Areas to be transformed that have the opportunity to establish a new character due to their low sensitivity to change, unsuccessful built form and opportunity for growth.

c) Existing or planned town centres and local centres that have opportunities for densification.

f) Locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling’.

Despite the site meeting these criteria, the site has not been included within the Tall Building Zone and we strongly encourage the Council to rectify this in their forthcoming modifications to Draft Policy D4.

It should also be noted that the study is not supported by massing studies or townscape visual impact assessments which could further inform the Council’s decision-making process

	LB Newham Response
Proposed modifications and explanation	
Representor Comment	when allocating their 'Tall Building Zones' and recommended heights associated with each.
Complies with Duty to Cooperate?	
Consistent with the London Plan?	
Consistent with the NPPF?	
Effective?	
Justified?	
Positively prepared?	
Sound?	
Legally Compliant?	
Implementation text	
Justification	
Clause	
Introduction	
Site allocation	
Policy	
Chapter	
Comment Reference	
Agent	
Representor	
Representation Reference	

Design Comments to the [full Regulation 19 Representations](#)

[illegible]

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			<p>[Image inserted - Application Site (Red Boundary) and Completed and Consented Schemes in Ilford Town Centre]</p> <p>[Image inserted - 3D model showing Consented and Approved schemes in Ilford Town Centre]</p> <p>These points aside, the “starting point” of increasing the density (as recommended by the Characterisation Study) of the 970 Romford Road site has been fully assessed by Rolfe Judd Architecture in the attached document.</p> <p>As discussed in the sections above, Figure 49 of the document demonstrates that the site has a complex network of important utilities that run through various parts of the site. The utilities include High, Medium and Low Pressure Gas Pipes, a High Pressure Water Pipe below ground and High Voltage Electricity Pylons which run above the site adjacent to the Motorway. All utilities have easements which restrict the developable area to the area shown in white on the image below.</p> <p>[Image instered - Plan Showing Utilities running through the site]</p> <p>Alterations to a limited number of the existing services would increase developable area, however, it is a very costly exercise only enabled through efficient redevelopment of the site, thereby requiring the resulting development to offer appropriate viability.</p> <p>The map above and the attached document clearly outlines that the application site has a very limited developable footprint due to these constraints, therefore the only way to viably increase the density on site is the increase the height of the proposed buildings.</p> <p>Under the wording of Draft Policy D4, the site would not be able to achieve a height which matched the clear pattern of neighbouring 11-13 storey residential buildings fronting 970 Romford Road as the site is not within a ‘Tall Building Zone’. This restriction effectively stymies the site, leaving it undevelopable and locked in its gym and car rental use for the foreseeable future, thereby not fulfilling the aims of the LIL designation or offering an alternative use (residential/student/co-living) which could contribute toward the Council Housing targets.</p> <p>Please refer to the appended representations for full details.</p>		

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Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/008	Design	D4 Tall buildings						Blank	No						Blank	Our client acknowledges that their site falls within the proposed Grantham Road Local Industrial Location (LIL) and proposed Neighbourhood N16 (Manor Park and Little Ilford). We also note that Draft Local Plan Policy D4 has identified several areas in which are suitable for tall buildings, and this does not include our applicant’s site. We therefore seek to amend the designation to ensure its inclusion in a ‘Tall Buildings Zone’, amendments to the wording of Draft Policy D4		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified, as evidenced by the Tall Building Annex (2024). Based on the sieving exercise to identify locations for tall buildings and for the reasons explain in the responses [Reg19-E-179/003, Reg19-E-179/004,Reg19-E-179/006], the site is not considered suitable for tall building designation.

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Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/012	Design	D4 Tall buildings						Blank	No						Blank	<p>Draft Policy D4 Tall Buildings</p> <p>Draft Policy D4 (Tall Buildings) defines a tall building as ‘those at or over 21m, measured from the ground to the top of the highest storey of the building’. This definition is in line with the definition of the London Plan 2021.</p> <p>Clause 2 of Draft Policy D4 states that: ‘2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1’</p> <p>The wording of the draft policy is clear that tall buildings will not be acceptable outside of the areas identified in Table 1. Our client’s site is heavily restricted in terms of its developable footprint due to the number of utilises running across the site and therefore the fact that it is not allocated in a “Tall Building Zone” inhibits the ability to bring forward any meaningful development.</p> <p>It is considered that the policy is unduly restrictive and should not restrict building heights where it can be demonstrated they meet the requirements of clauses 3 and 4 of the same policy or Policy D9 of the London Plan.</p> <p>We refer to the High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), which questioned how the policy is to be interpreted. Policy D9 (Tall Buildings) requires London Boroughs to define all buildings within their local plans (Part A), requires London Boroughs to identify within their local plans suitable locations for tall buildings (Part B), identifies criteria against which the impacts of tall buildings should be assessed (Part C) and makes provision for public access (Part D).</p> <p>The High Court decision establishes that Policy D9 should be interpreted with flexibility and sites which are not designated in locations identified as suitable for tall buildings (Part B(3)) should not automatically be considered inappropriate.</p> <p>The judgement ruled that in considering whether to grant planning permission for a tall building which did not comply with Part B because it was not identified in the development plan, it would surely be sensible, and in accordance with the objectives of Policy D9, for the proposal to be assessed by reference to the potential impacts which are listed in Part C.</p>	<p>We therefore strongly recommend that LB Newham amend Policy D4 to ensure it is consistent with the London Plan and reflect the High Court judgement and the GLA’s interpretation of Policy D9. It is considered that the Council should incorporate wording into the draft Policy to confirm that each site should be assessed on its own merits without the constraint of the policy automatically ruling out tall buildings or restricting the maximum heights of tall buildings.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified. Tall buildings outside of tall building zones will, in line with policy D9 of the London Plan, be considered a departure from the Plan.</p> <p>Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. In addition, policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”</p> <p>The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. In line with policy D9, suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets.</p> <p>We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape. The Council is satisfied that the plan is sound without the proposed changes.</p>

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																			<p>[Image inserted - Extract Page 148 Newham Characterisation Study]</p> <p>The characterisation study’s evidence is clear that the site has a low sensitivity to change, unsuccessful built form and opportunity for growth which cumulatively mean that it meets the criteria of clause a) and should therefore be considered a suitable location for tall buildings.</p> <p>‘c) Existing or planned town centres and local centres that have opportunities for densification’.</p> <p>Whilst the site is not within a Town Centre or Local Centre Boundary it is on the edge of Ilford Town Centre which is outside of the Borough and therefore outside of the Characterisation Study’s scope. Ilford Town Centre contains a high number of Tall Buildings which should be taken account of when assessing suitable height on neighbouring sites like 970 Romford Road.</p> <p>‘f) Locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling’.</p> <p>These criteria are fully met as the site is situated along Romford Road and just outside Ilford Metropolitan Town Centre.</p> <p>The site has excellent access to public transport services with PTAL rating of 6a. Ilford Station is located within 0.5 kilometres with regular service to Liverpool Street and in addition, a number of bus services run along Romford Road.</p> <p>The site benefits from easy links with local facilities and shops, which provide a wide range of retail opportunities for the site to incorporate as part of the development. Of particular note, is the Sainsbury’s superstore situated approximately 400m walking distance to the east.</p> <p>In summary, the Characterisation Study provides several maps which demonstrate that the 970 Romford Road site would be a prime candidate for inclusion as one of the Council’s ‘Tall Building Zones’ as it meets the following criteria in the Characterisation Study’s Methodology:</p> <p>a) ‘Areas to be transformed that have the opportunity to establish a new character due to their low sensitivity to change, unsuccessful built form and opportunity for growth.</p> <p>c) Existing or planned town centres and local centres that have opportunities for densification.</p> <p>f) Locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling’.</p> <p>It should also be noted that the study is not supported by massing studies or townscape visual impact assessments which could further inform the Council’s decision-making process when allocating their ‘Tall Building Zones’ and recommended heights associated with each.</p>		
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/015	Design	D4 Tall buildings						Blank	No						Blank	Tall Buildings on sites outside of designated ‘Tall Building Zones’ Whilst we strongly consider the site to be a suitable candidate for allocation as a ‘Tall Building Zone’, the following section addresses sites that fall outside of these designations which would be heavily restricted under the Draft Policy D4 wording. Notwithstanding the points made earlier in this		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified. The information you provided has been reviewed, but it hasn't resulted in a change. The site is designated as Local Industrial Location, LIL10: Grantham Road, for industrial intensification, through small to

<p>document relating to the High Court Judgement of London Plan Policy D9 (Mayor of London vs London Borough of Hillingdon, 15 Dec 21), the Characterisation Study has been examined further to understand its recommendations on the matter.</p> <p>Page 163 The Newham Characterisation Study addresses the subject of Tall Buildings Outside of Tall Building Zones: 'In all cases, though particularly conserve and enhance areas, intensification should seek the optimisation of sites through a design-led process, with appropriate density, rather than height, as the starting point. Proposals should always be context-led, with any increase in scale beyond the prevailing height the product of a thorough analytical and design process. The scale and massing of any proposal must always be underpinned by a compelling design case that illustrates how increased scale will contribute towards an enhanced character'.</p> <p>The Study's recommendation to promote greater density on sites before consideration of increased height is referred to as a "Starting point". The policy then makes clear that the context will be key in the determining the suitability of any increase in scale beyond the prevailing heights in the vicinity. Importantly, the recommendations do not categorically rule out tall buildings in certain areas which Draft Policy D4 has done. The blanket allocations for these zones do not consider the nature or appearance of certain unallocated areas within the Borough that already have tall buildings, neither does it address the gradual change in the character and appearance of the area surrounding tall buildings zones.</p> <p>Page 166 of the Characterisation Study contains a map (shown below) which identifies the 5 neighbouring residential buildings fronting Romford Road which are all 33-40m in height. The map also identified two residential buildings to the south which measure 51-60m in height.</p> <p>[Image inserted - Extract Page 166 Newham Characterisation Study]</p> <p>The map shows that Romford Road and the surrounding area has a very varied context but a clear coalescence of tall buildings toward Ilford Town Centre and fronting Romford Road.</p> <p>Within Ilford Town Centre itself there are nine examples of tall buildings ranging between 7 and 47 storeys all of which are within 500m of the application site. Consideration of these buildings appear to be absent from the Characterisation Study (2024), perhaps because they fall outside of Newham's Borough boundary. Despite them lying outside of the Borough's boundary, these examples do have a clear role in the setting and context of 970 Romford Road and are therefore crucial considerations when determining the appropriate heights for the site.</p> <p>[Image inserted - Application Site (Red Boundary) and Completed and Consented Schemes in Ilford Town Centre]</p> <p>[Image inserted - 3D model showing Consented and Approved schemes in Ilford Town Centre]</p> <p>These points aside, the "starting point" of increasing the density (as recommended by the Characterisation Study) of the 970 Romford</p>	<p>medium scale warehousing units, to address the borough's significant need for industrial floorspace as identified in the Employment Land Review (2022). Based on the Industrial Land and Uses Draft LPG, industrial intensification can be supported on the site through stacked industrial typology with development below 21m. More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025). Furthermore, as highlighted in the existing height assessment in the Tall Building Annex (2024) p. 18-19, the height of existing isolated point blocks in a low rise context is not considered a precedent for tall buildings. We acknowledge that Fig 23 in the Tall Building Annex doesn't include the Redbridge tall building zone. However, the conclusion regarding appropriate heights in this location has not changed. The townscape views provided in your document clearly demonstrate that the site is outside Ilford Town Centre and that the tall buildings within Ilford tall building area sensitively stepdown towards the River Roding and the North Circular Road. Based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights and, due to its location in proximity to a low rise context and outside of a town centre designation and Opportunity Area, the site is not considered an appropriate location for a tall building designation. The Council is satisfied that the plan remains sound without the proposed changes.</p>
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Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			<p>Road site has been fully assessed by Rolfe Judd Architecture in the attached document.</p> <p>As discussed in the sections above, Figure 49 of the document demonstrates that the site has a complex network of important utilities that run through various parts of the site. The utilities include High, Medium and Low Pressure Gas Pipes, a High Pressure Water Pipe below ground and High Voltage Electricity Pylons which run above the site adjacent to the Motorway. All utilities have easements which restrict the developable area to the area shown in white on the image below.</p> <p>[Image inserted - Plan Showing Utilities running through the site]</p> <p>Alterations to a limited number of the existing services would increase developable area, however, it is a very costly exercise only enabled through efficient redevelopment of the site, thereby requiring the resulting development to offer appropriate viability.</p> <p>The map above and the attached document clearly outlines that the application site has a very limited developable footprint due to these constraints, therefore the only way to viably increase the density on site is the increase the height of the proposed buildings.</p> <p>Under the wording of Draft Policy D4, the site would not be able to achieve a height which matched the clear pattern of neighbouring 11-13 storey residential buildings fronting 970 Romford Road as the site is not within a 'Tall Building Zone'. This restriction effectively stymies the site, leaving it undevelopable and locked in its gym and car rental use for the foreseeable future, thereby not fulfilling the aims of the LIL designation or offering an alternative use (residential/student/co-living) which could contribute toward the Council Housing targets.</p>		
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/016	Design	D4 Tall buildings						Blank	No						Blank	<p>Summary and Recommendations</p> <p>In conclusion, much greater consideration needs to be given to the site's ability to provide additional tall and mid-rise buildings in this location.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified, as evidenced by the Tall Building Annex (2024). Based on the sieving exercise to identify locations for tall buildings and for the reasons set up in the responses [Reg19-E-179/003, Reg19-E-179/004,Reg19-E-179/006], the site is not considered suitable for a tall building designation. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/021	Design	D4 Tall buildings						Blank	No						Blank	<p>[We make the following recommendations for the next iteration of the Draft Local Plan:</p> <ul style="list-style-type: none">- De-allocate the 970 Romford Road site from the LIL designation due to it having no existing industrial floorspace on site and no realistic or viable prospect of the site being redeveloped for industrial use.- Amend the wording of Draft Policies J1 and J2 to allow for co-location in LILs;]- Recognise the site as being an appropriate location for Tall buildings through allocation within a ‘Tall Building Zone’ under Policy D4;		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified.</p> <p>The information you provided has been reviewed, but it hasn't resulted in a change. Through the tall buildings assessment, it was concluded that, whilst the site meets some of the criteria to be identified as a suitable location for tall building developments, due to its location in proximity to a low rise context and outside of a town centre designation and Opportunity Area, the site is not considered an appropriate location for a tall building designation.</p> <p>More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025).</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/022	Design	D4 Tall buildings						Blank	No						Blank	[We make the following recommendations for the next iteration of the Draft Local Plan: [- De-allocate the 970 Romford Road site from the LIL designation due to it having no existing industrial floorspace on site and no realistic or viable prospect of the site being redeveloped for industrial use. - Amend the wording of Draft Policies J1 and J2 to allow for co-location in LILs; - Recognise the site as being an appropriate location for Tall buildings through allocation within a ‘Tall Building Zone’ under Policy D4;] - Incorporate flexibility within policy D4 to allow for tall buildings outside of ‘Tall Building Zones’ to reflect the wording of the new London Plan and the clarifications following its implementation;		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified. Tall buildings outside of tall building zones will, in line with policy D9 of the London Plan, be considered a departure from the Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. In addition, policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans”. The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. In line with policy D9, suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-179	AIM Land Ltd	Rolfe Judd	Reg19-E-179/024	Design	D4 Tall buildings						Blank	No						Blank	[970 ROMFORD ROAD LOCAL PLAN REPRESENTATIONS DESIGN DOCUMENT appended to response]		Comment noted.

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Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/005	Design	D4 Tall buildings			TBZ4: Beckton			Blank	Blank						Blank	<p>[Key Emerging Policies</p> <p>The following draft policies are relevant to the Alpine Way site:]</p> <p>D4.TBZ4: (Tall buildings - Beckton Tall Building Zone) cover the area around the Windsor Terrace/Woolwich Manor Way roundabout and includes the entirety of the Alpine Way site. The policy states that prevailing building heights are generally expected to range from 9 to 21 meters (approximately 3 to 7 storeys). The policy allows for limited taller building elements up to 32 meters (around 10 storeys) to mark key areas, such as the centre of the town. There is also provision for buildings up to 40 meters (approximately 13 storeys) near the Beckton DLR station, which includes the south-western corner of the Alpine Way site. The policy emphasizes careful height transitions to ensure harmony with surrounding developments and higher-density areas.</p>		Comment noted.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/013	Design	D4 Tall buildings			TBZ4: Beckton			Blank	Blank						Blank	<p>[Representations</p> <p>We would like to submit representations to the Regulation 19 Draft Submission Local Plan consultation in response to the following draft policies:]</p> <p>2. Support ‘D4: TBZ4 Beckton Tall building zone’ and the inclusion of the south-western corner of the Alpine Way site allocation within the 40m zone, but request that opportunities for additional height are explored on the site to maximise housing delivery.</p>		A change to this policy approach has not been made. We did not consider this change to be necessary as, based on the sieving exercise to identify tall building locations and maximum heights, due to low rise context and its sensitive location in proximity to heritage assets, this Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights and design principles seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council is satisfied that the plan remains sound without the proposed changes.

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Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/025	Design	D4 Tall buildings			TBZ4:Beckton			Blank	Blank						Blank	D4: TBZ4 Beckton Tall Building Zone In our response to the Regulation 18 Local Plan consultation we proposed amending the policy map to extend the 40m zone of TBZ4 to include the south-western corner of Beckton Retail Park. Draft Policy D4.TBZ4: (Tall buildings - Beckton Tall Building Zone) allows for limited taller building elements up to 32 meters (around 10 storeys) to mark key areas, such as the centre of the town. There is also provision for buildings up to 40 meters (approximately 13 storeys) near the Beckton DLR station, which includes the south-western corner of the Alpine Way site. LAMIT c/ CCLA Investment Management Ltd support the extension of the 40m zone to include Alpine Way. We suggest that the Council is more ambitious in regard to the maximum height allocation. 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/Winsor Terrace/Tollgate Road roundabout. The new Labour government has proposed changes to the NPPF, emphasizing that local planning authorities should give significant weight to the benefits of delivering as many homes as possible, especially on previously developed land. Since the 2018/19 scheme was developed the new London Plan has also been adopted and we believe this updated planning context provides an opportunity to propose a series of taller buildings than before. We consider a height of around 20+ storeys to be appropriate for the south-west corner of the Alpine Way site. This increase would contribute to addressing the shortfall in housing and represent a suitable clustering of taller buildings, aligning with the N11.SA1 East Beckton Town Centre allocation.	We strongly encourage the Council to consider increasing the height limit within the 40m zone and extending this along the western boundary of the site.	A change to this policy approach has not been made. We did not consider this change to be necessary as, based on the sieving exercise to identify tall building locations and maximum heights, due to low rise context and its sensitive location in proximity to heritage assets, this Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights and design principles seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-181	LAMIT c/ CCLA Investment Management Ltd	Rolfe Judd Planning	Reg19-E-181/029	Design	D4 Tall buildings						Blank	Blank						Blank	[Conclusions] Given the encouragement in national planning guidance and through the London Plan we consider there to be an opportunity for a series of taller buildings than previously proposed and we encourage the Council to take a more ambitious in regard to the maximum height allocation.		A change to this policy approach has not been made. We did not consider this change to be necessary as, based on the sieving exercise to identify tall building locations and maximum heights, due to low rise context and its sensitive location in proximity to heritage assets, this Site is not considered appropriate to accommodate greater height. The proposed maximum permissible heights and design principles seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/008	Design	D4 Tall buildings							Yes	Yes					Yes	<p>Draft Policy D4: Tall buildings</p> <p>Draft Policy D4 states that:</p> <p>“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).</p> <p>Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1”.</p> <p>Table 1, on page 70 of the Draft Submission Local Plan (Regulation 19 – June 2024) provides a table of Tall Building Zones, and for Tall Building Zone 3, in reference to East Ham, it states that:</p> <ul style="list-style-type: none">• “Height Range Maximum: 32m (ca. 10 storeys) with opportunity for one tall building element at 50m (ca. 16 storeys) in the defined area;• Prevailing heights should be between 9m and 21m (ca. 3-7 storeys);• Opportunity to include tall building elements up to 32m (ca. 10 storeys);• Limited opportunity in the far north east corner to include a tall building element up to 50m (ca. 16 storeys) in the defined area;• Tall building elements should be limited in number and height, scale and massing should be assessed to avoid harm to the significance of relevant heritage assets; and• Development should be mindful of height transitions when delivering higher densities”. <p>Draft Policy D4 states further that:</p> <p>“All tall buildings should be of high quality design and environmental standards, and... achieve exemplary architectural quality and make a positive contribution to the townscape through volumetric form and proportion of the mass and through architectural expression of the three main parts of the building: a top, middle and base...”.</p> <p>The Draft Submission Local Plan (Regulation 19 – June 2024) document includes a map of Newham’s tall building zones, which is shown below: [see map extract at page 5]</p> <p>The definition of tall buildings in Newham is in line with the definition of the London Plan 2021. A tall building in Newham is any building over 21m measured from the ground to the top of the highest storey of the buildings (excluding any required and appropriately designed parapets, roof plants, equipment or other elements). Recognising that using storeys provides a simple way to illustrate height, an indicative estimation of number of storeys, which could be achieved, is provided for explanatory purposes only, with the assumption of a typical residential floor-to-floor level of 3m. As it is recognised that storey heights vary between land uses and constructions methods, the tall buildings definition covers all buildings of 21m, irrespective of use and related floor-to-floor height.</p> <p>Designated Tall Buildings Zones are identified in the Policies Map. The Tall Building Zones Map identifies the maximum permissible heights and where the prevailing height of new developments could be between 9m and 21m and where the prevailing height can exceed 21m, but should be below 32m. The varying heights across Tall Building Zones allow for transitioning heights to surrounding context and sensitive areas.</p>	Comment noted.
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Reg19-E-184	Primark Stores Ltd	CBRE	Reg19-E-184/010	Design	D4 Tall buildings						Yes	Yes						Yes	<p>While the Map of Newham’s Tall Building Zone in Figure 2 above [see figure 2 at pg 5, showing policy map extract] appears to indicate that the Site falls within a Tall Building Zone, when you undertake a further analysis of the draft Policies Map, it is clear that the Site is outside the Tall Buildings Zone for East Ham.</p> <p>It is acknowledged that the Site has a “sensitive edge (heritage assets – low rise context)” due to its relationship with the three-storey terrace on its eastern boundary, however it is considered that southern portion of the Site could accommodate a tall building. Through design-led site capacity optimisation, in line with draft Policy D3, and subject to high quality design, and townscape and visual impact analysis, it is considered that a tall building could respond to the prevailing context created by the New Market Place (up to 15-storeys) and the Brick Yard (up to 11-storeys) developments. As shown above in Figure 3 [see figure 3 at pg 6], draft Policy D4 allows for a tall building of up to 50m in height directly opposite the Site, therefore it is considered that a tall building on the Primark site could be easily accommodated in this existing and emerging context.</p> <p>Primark does not support the designation boundaries of the Tall Building Zone in East Ham, and requests that the boundary of the Tall Building Zone is amended to include the southern rectangular-shaped part of the Site.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the plan to be positively prepared. Suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets as shown in the Tall Building Annex (2024). Site allocations have also been subject to capacity testing to provide the housing capacity figure to inform the housing trajectory. Through this analysis it was concluded that, whilst the site meets some of the criteria to be identified as a suitable location for tall building developments, the constrained nature of the site and its proximity to the low rise context make the site not suitable for a well-designed and deliverable tall building. The Council is satisfied that the plan is sound without the proposed changes.</p>
Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/009-a	Design	D4 Tall buildings			TBZ19: Stratford Central											<p>Policy D4: Tall Buildings</p> <p>Further to our Regulation 18 representations, Hadley supports the changes made to extend the 100m zone to cover the whole IQL North site as part of TBZ19: Stratford Central. This will allow the comprehensive development of the site, making suitable contributions to optimising use of land in the Metropolitan Centre.</p> <p>Hadley is disappointed that other suggested amendments to Policy D4 in our Regulation 18 representations have not been incorporated and the policy continues to prevent tall buildings being located outside of areas designated as ‘Tall Building Zones’. As noted in LBN’s response, there may be circumstances where through detailed townscape and impact assessments, a development that complies with Policy D9 of the London Plan and located outside a Tall Building Zone could be acceptable if it is demonstrated that the impact on townscape is acceptable and the public benefits delivered would outweigh any potential harm to the townscape. Hadley suggests that this wording should be added to the policy to outline how tall buildings may be acceptable outside of the Tall Building Zones where they are demonstrated to be high quality, deliver public benefits and comply with the development plan as a whole.</p>		<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.</p>

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/009-b	Design	D4 Tall buildings			TBZ19: Stratford Central													<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the policy to be in conformity with the London Plan. Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</p> <p>In line with policies D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p>

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/010-a	Design	D4 Tall buildings			TBZ19: Stratford Central											Hadley is disappointed that requests to increase the indicative 100m zone to 120m for IQLN have not been included within TBZ19: Stratford Central in the latest DSLP. The proposed development at IQLN has been through extensive design development in discussions with the LLDC Planning Officers and Quality Review Panel to ensure a high- quality scheme that responds to its context has been proposed. This live application (ref: 23/00441/FUL) has been through consultation with key statutory stakeholders (including LBN) who are supportive of the proposed heights in this location. In addition, the approved Stratford City Outline Planning Permission (ref:10/90641/EXTODA) sets out maximum height parameters that identify part of the IQLN site for buildings up to 120m AOD. The parameter plans for this outline consent included the wider Legacy Communities Scheme and provide continuity with the rest of the development in the area. Therefore, Hadley would like to reiterate its request for the 100m zone to be increased to 120m for IQLN to be in line with the outline planning permission and the live planning application and extensive pre-application discussions.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/010-b	Design	D4 Tall buildings			TBZ19: Stratford Central											[...] As explained above, the Local Plan should propose indicative heights so that each site should be assessed through a design led approach and allow for taller elements having regard to design, townscape, heritage and visual impact assessments.		<p>A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the policy to be in conformity with the London Plan. Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</p> <p>In line with policies D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025).</p> <p>Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-185	Hadley Property Group	Deloitte	Reg19-E-185/011	Design	D4 Tall buildings			TBZ18: Stratford High Street											In respect of RRW, Tall Building Zone TBZ18: Stratford High Street sets out the height for Site Allocation N8.SA7 Rick Roberts Way. This states there are opportunities to include limited tall building elements up to a maximum height of 50m (c.16 storeys), with a prevailing height of above 21m and below 32m (c. 7-10 storeys). By way of context Stratford High Street is defined by a series of tall buildings interspersed with low-rise developments. Hadley objects to the maximum height of 50m and recommends an indicative height of 75m for RRW. Hadley has been in pre-application discussions with LLDC regarding emerging proposals for the RRW site, following a design led approach that optimises the capacity of the site and maximises the delivery of affordable housing. The emerging proposals include a taller element on the High Street, such that Hadley requests that the indicative height in TBZ18 should be increased in this location. The development will play an important role in highlighting the importance of the Greenway junction with Stratford High Street at a townscape level. The emerging proposals provide an opportunity to deliver circa 70% affordable homes, helping to realise LBN’s shared ambitions for the delivery of affordable housing. [As explained above, the Local Plan should propose indicative heights so that each site should be assessed through a design led approach and allow for taller elements having regard to design, townscape, heritage and visual impact assessments.]		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified and in conformity with the London Plan. Whilst the Council acknowledges that pre-application discussions have been held with LLDC officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. The tall buildings assessment fed into the site allocations capacity testing which provides the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Therefore, the Council considers that we have adopted an appropriate balance between optimising the use of land and meeting our objectively assessed need of housing. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-191	University College London	Deloitte	Reg19-E-191/006	Design	D4 Tall buildings			TBZ19: Stratford Central											UCL welcomes the inclusion of the UCL East site within Tall Building Zone TBZ19: Stratford Central, but has concerns relating to the consistency in which maximum supported buildings heights are referenced in draft Policy D4 and the remainder of the draft Plan. The ‘Height Range Maximum’ given for Tall Building Zone TBZ19: Stratford Central on page 77 references “60m (ca. 20 storeys) and 100m (ca. 33 storeys) and 32m (ca. 10 storeys) in the defined areas”. The ‘further guidance’ then given on the same page notes that at Stratford Waterfront, “a limited number of tall building elements of up to 100m (ca. 33 storeys) could be provided”. However, when then reviewing the ‘Map of Newham’s Tall Building Zones’ at page 79, and its associated colour coding, it does not appear that the Stratford Waterfront area, where a maximum height of 100m is given, extends to include where UCL East is located. The UCL East site instead looks to fall within an area where the maximum height is given as 60m.	A maximum height of 60m for the UCL East site is at odds with the height parameters already consented under the UCL East Outline Consent (ref. 17/00235/OUT), which permits height of up to 72m. UCL therefore feels that the Map of Newham’s Tall Buildings Zone should be amended to reflect this.	The Council’s objective for this policy approach is to seek and preserve borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. However, the Council recognises the importance of ensuring the Plan is clear and easy to read and has therefore made the following wording change: [To mark Stratford Station, Stratford International station, Westfield Avenue and the urban edge of Queen Elizabeth Olympic Park at International Quarter and the northern part of Stratford waterfront, a limited number of tall building elements of up to 100m (ca. 33 storeys) could be provided.] which is included in the modification table.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/027	Design	D4 Tall buildings			1				No							Policy D4: Tall buildings 4.8 St William remains supportive of Policy D4 which sets out LBNs definition of a tall building (consistent with the London Plan), confirms the list of designated Tall Building Zones within the borough along with guidance on heights within each zone.		Support noted.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/028	Design	D4 Tall buildings			2				No					No		4.9 Whilst St William remain supportive of this policy, Part 2 continues to state that ‘the height of tall buildings in any ‘Tall Buildings Zone’ should not exceed the respective limits set out in Table 1’. As per previous comments, St William considers this height restriction to conflict with the design led approach set out in Policy D3 of the London Plan and continues to request that this statement is removed. The Tall Building Zone heights should be there as guidance and should not preclude development that deviates from these heights if the proposed tall building has followed a design led approach (Policy D3 of the London Plan) and can be justified in design terms including townscape and visual impacts. The policy should incorporate sufficient flexibility to enable proposals to be considered on a case by case basis. 4.10 Table 1 sets out the proposed heights for the Tall Building Zones. St William provides comments on Tall Building Zone 5 Gallions Reach (which applies to the Beckton Riverside site allocation) and Tall Building Zone 15 West Ham Station (which applies to the Bromley by Bow gasworks site or the TwelveTrees Park and Former Bromley by Bow Gasworks site allocation) within the table below:		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/029	Design	D4 Tall buildings			TBZ5: Gallions Reach											<div>TBZ5: Gallions Reach [only comments are reproduced from table at pg 16]</div> <div>- Whilst St William welcomes the increase in heights from the Draft Regulation 18 Local Plan, the proposed maximum heights do not reflect the Site’s location within an opportunity area, an area that is not adjacent to other residential uses; the Site’s frontage to the river or the exceptional circumstances of this former gasworks site and the associated abnormal costs involved with remediating the Site.</div> <div>- The height range maximum should be between 50 m and 80 m (17-27 storeys).</div> <div>- Prevailing heights should be between 30 m and 50 m (10-20 storeys).</div> <div>- Opportunity for tall building elements should not be limited to the riverside or new or existing stations.</div> <div>- Building heights are constrained and limited by CAA height restrictions.</div>	<div>[Appendix 12: General Policies – Suggested amendments]</div> <div>• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) 30m and 50m (10-20 storeys)</div> <div>• Opportunity to include tall building elements up to 40m (ca. 13 storeys) in limited locations including but not limited to Gallions Reach DLR station and the riverside to mark the neighbourhood parade, and 50m- 80m 80m (ca. 16- 27 storeys) in limited not limited to in the proximity of the new town centre and DLR station.</div> <div>• Development should be mindful of height transitions when delivering higher densities and/or industrial intensification through stacked industrial typology.</div> <div>[under height range maximum, suggested text amends are]</div> <div>32m (ca. 10 storeys); 40m (ca. 13 storeys); 50m-80m (ca. 16</div> <div>- 27 storeys) in the defined areas.</div>	<div>This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because prevailing heights, maximum height parameters and location for tall buildings result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. In line with London Plan policies D9 and D3, the locations and 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. Whilst the Council acknowledges that pre-application discussions have been held with LBN officers, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Furthermore, your suggested wording on airport constraints is not considered appropriate because engagement on the safeguarding controls associated with the Airport’s operations will be undertaken with London City Airport at pre-application stage. The Council is satisfied that the plan is sound without the proposed changes.</div>

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/030	Design	D4 Tall buildings			TBZ15: West Ham Station											<p>TBZ15: West Ham Station [only comments are reproduced from table at pg 16-17]</p> <ul style="list-style-type: none">- Heights of the consented buildings at the Twelvetrees Park development (and the resolution to grant for the Bromley by Bow proposals) exceed the height thresholds outlined in this Tall Building Zone.- Prevailing heights of between 21m and 32m (7-10 storeys) is not reflective of what has been consented and should be increased to between 30m and 60 m (10-20 storeys).- Heights should not be prescribed for buildings within the vicinity of the gasholders as they will be determined via a design and heritage led approach and through a thorough townscape and visual impact assessment.- Whilst it is welcomed that there is support for limited tall building elements of up to 110m this should not be restricted to along the railway line, Bow Creek (the River Lea) and West Ham station as there may be a need for other landmark buildings within the Site given the size of the Site.- Proposed amendments to the wording of this table and proposed heights can be found in Appendix 12.	<p>[Appendix 12: General Policies – Suggested amendments]</p> <ul style="list-style-type: none">• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys), 30m and 60m (ca. 10-20 storeys) except in the immediate context of the listed gasholders where prevailing heights should be between 9m and 21m (ca. 3- 7 storeys).• In the immediate context of the listed gasholders, opportunity to include limited tall building elements of up to 32m (ca. 10 storeys).• Along the railway line and Bow Creek (River Lea) and to mark West Ham station, There is opportunity to include limited tall building elements of up to 100m (ca.33 storeys), which are sufficiently spaced to allow for views and space around the listed gasholders.• In the rest of the Tall Building Zone, opportunity to include limited tall building elements of up to 50 m (ca. 16 storeys).• Height, scale and massing of development proposals should be assessed to conserve and enhance the character of heritage assets without detracting from important landmarks and key views set in the Three Mills conservation area appraisal and management guidelines.• All taller buildings should be integrated carefully to aid wayfinding and mark special locations.• Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses. <p>[under height range maximum, suggested text amends are]</p> <p>50m (ca. 16 storeys) and 30m- 60m (ca. 10- 20 storeys) and 100m (ca. 33 storeys) in the defined areas.</p>	<p>This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified because prevailing heights, maximum height parameters and location for tall buildings result from an evaluation that already addressed design-led approach considerations in line with London Plan policy D3. In line with London Plan policies D9 and D3, the locations and 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. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Building Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/031	Design	D4 Tall buildings			TBZ18: Stratford High Street											TBZ18: Stratford High Street [only comments are reproduced from table at pg 17] - Prevailing heights should be between 30m and 60 m (10-20 storeys). - Assessment of townscape and visual impact does not need to be referenced specifically within this tall building zone as it should apply to all (tall) buildings and referenced more generally rather than specifically for this site allocation.	[Appendix 12: General Policies – Suggested amendments] Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) 30m and 60m (10-20 storeys) except at the sensitive edges of the tall building zone, where prevailing heights should be between 9m and 21m (ca. 3-7 storeys). • Opportunity to include limited tall building elements up to 50m (ca. 16 storeys) and 100m (ca. 33 storeys), 60m (ca. 20 storeys), 40m (ca. 13 storeys) and 32m (ca. 10 storeys) in the defined areas. • Tall elements in the 32m area and/or in close proximity to the conservation areas should be limited in number. • 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 and Sugar House Lane conservation area appraisal and management plan. • 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. • Careful consideration is required for the location of tall buildings, particularly south of the waterways to avoid overshadowing impact on watercourses.	This wording change is not supported. We did not consider this change to be necessary as the Council considers the plan to be positively prepared and justified. Whilst we acknowledge that the applicant could benefit from planning consents under the current Local Plan, the submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise to identify tall building locations and maximum height and due to its proximity to the Sugar House Lane and Stratford St. Johns conservation areas, the TBZ18: Stratford High Street is not considered appropriate to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Furthermore, for the reasons set out above, it is considered fundamental to retain the reference to townscape assessment requirement to reinforce the need to assess cumulative impact and avoid the scattered composition of tall buildings developed in the past years around Stratford. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/032	Design	D4 Tall buildings			TBZ3: East Ham											4.11 Table 1 of Policy D4 should be updated to include site allocation N13.SA3 Former East Ham Gasworks within the East Ham Tall Building Zone (TBZ3) owing to the scale of the existing gasholder on site which extends to circa 52m AOD in height (equivalent to 16 storeys). The Council’s Characterisation Study (December 2024) has omitted the existing tall building on site page 168) and unlike the other gasworks in the Borough, is subject to limited reference within the study.	[Appendix 12: General Policies – Suggested amendments] TBZ3: East Ham [table suggest that under the site allocations column for this TBZ, site N13.SA3 Former East Ham Gasworks should be added. See pg 106]	A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.

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Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/033	Design	D4 Tall buildings							No	No	No		No			4.12 As a general comment, the tall building policy (Policy D4) should make clear that tall buildings are expected to follow the design led approach in line with Policy D3 of the London Plan. As currently drafted Policy D4 is not considered to be positively prepared or justified on the basis that it doesn’t align itself with the consented and proposed heights on various site allocations that have been subject to extensive design scrutiny and development. The policy as currently drafted is not considered to meet the tests of soundness set out in the NPPF.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared, justified and in conformity with regional and national policy requirements. The Council considers the policy is in line with London Plan policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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 and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-196	Daminis Limited	Planning Insight	Reg19-E-196/002	Design	D4 Tall buildings			TBZ2: Green Street			Blank	Yes						Blank	This representation relates to policy D4: Tall Buildings. The designation of Green Street as a Tall Buildings Zone is strongly supported, it is a sustainable location and the London Plan recognises it as a key growth zone. The maximum height of 15 storeys is supported.	It is considered that prevailing heights between 9m and 21m, should be increased at the top end. Buildings above 18m require two staircases. Given the conditions of plots, which can be shallow on Green Street, the two-stair requirement means that buildings may need to be over 21m in height to be viable. It is our view that there should be more opportunity for buildings above 21m recognising limited locations of buildings at the maximum height of 15 storeys.	A change to this policy approach has not been made. We did not consider this change to be appropriate as the Council considers the policy to be positively prepared and effective. As highlighted in the Tall Building Annex (2024) ‘prevailing heights will help establish a consistent character in line with the existing and emerging surrounding context, from which taller building elements could emerge’. Therefore, considering the low/medium rise context, higher prevailing heights of those proposed within TBZ2: Green Street are not considered suitable. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-200	London City Airport		Reg19-E-200/028	Design	D4 Tall buildings			Table 1 Tall Building Zones											<p>Policy D4: Tall Buildings</p> <p>We note the height ranges specified in Policy D4 and welcome the caveat heights in Tall Building Zones close to the airport are subject to airport height constraints. It would be very useful to developers and the airport to include advice under this policy that requires any development in areas subject to airport height constraints must also engage with the airport at the pre-application stage. This is to ensure the developer understands what aviation safeguarding assessments may be required, as well as other assessments with NATS or airlines that can be facilitated by the airport. This will avoid potential retrospective assessments occurring either at the application or implementation stages of the development. An assessment has been undertaken at Annex 3 which provides detailed commentary of the proposed aviation safeguarding provisions (including in relation to height, wildlife risk and public safety), and makes suggestions for where provisions could be amended to supplemented within Policy D4.</p>		<p>The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date.</p> <p>The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. We did not consider this change to be necessary as policy GWS3 1.e adequately addresses the need to deliver appropriate biodiversity measures within the London City Airport Safeguarded Area. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ5: Gallions Reach, TBZ7: King George V/Pier Parade, TBZ8: Store Road / Pier Road, TBZ11: Lyle Park, TBZ12: Custom House, TBZ13: Canning Town, TBZ21: Excel West, TBZ22: Thameside East] which is included in the modification table.</p>

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Reg19-E-200	London City Airport		Reg19-E-200/034-a	Design	D4 Tall buildings			Table 1 Tall Building Zones											Table 1: Tall Building ZonesAn assessment of the nominated tall building zones has been undertaken in light of the LCY safeguarding requirements. Suggested changes from this assessment have been provided at Annex 3	See Annex 3 .	<p>The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in line with London Plan policy D9. The proposed maximum permissible heights seek to set and preserve a borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The Council considers that referencing heights limit threshold for airport safeguarding analysis could lead to misinterpretation. We are also aware that the safeguarding zones are subject to change, which means that including them might make the policy out of date.</p> <p>The Council considers that policy T5.6 and the guidance in Table 1: Tall Buildings adequately address engagement requirements with the London City Airport and airport constraints. This wording change, to make reference to London City Airport’s Guidance on Biodiversity and Aerodrome Safeguarding, is not supported. We did not consider this change to be necessary as policy GWS3 1.e adequately addresses the need to deliver appropriate biodiversity measures within the London City Airport Safeguarded Area. For the reasons set out above, we did not consider necessary to add detailed safeguarding requirements in the tall buildings designation subject to airport constraints.</p> <p>However, the Council recognises the importance of ensuring the Plan is comprehensive and easy to read and has therefore made the following wording change to the guidance in Table 1: Tall Buildings: [Add ‘subject to airport constraints’ to TBZ5: Gallions Reach, TBZ7: King George V/Pier Parade, TBZ8: Store Road / Pier Road, TBZ11: Lyle Park, TBZ12: Custom House, TBZ13: Canning Town, TBZ21: Excel West, TBZ22: Thameside East] which is included in the modification table.</p>

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Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/031-a	Design	D4 Tall buildings			TBZ10: North Woolwich Road											The proposed inclusion of Silvertown within a tall building zone is supported, and the hybrid planning application includes some buildings which would be considered tall buildings (most of which were approved as tall buildings in the Phase 1 RMA).	As aforementioned, the maximum height should be 55.9m AOD as this is the approved maximum height of the Millennium Mills building.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. However, the Council acknowledges that consents have been granted to buildings at a greater heights of the maximum permissible heights, and that those buildings can still benefit from existing consent. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/031-b	Design	D4 Tall buildings			4		D4.4										The proposed expectation for the shoulder height of tall buildings being at a 1:1 relative to the width of the street (Part 4) is highly prescriptive and would not be conducive to high quality public realm, streetscape and building design in dense urban environments. This should be deleted in order to allow applicants to agree site-specific approaches with LBN Design Officers and the DRP.	This wording change is not supported. We did not consider this change to be necessary as the Council considers the policy to be positively prepared. A change to this clause was made at Reg 18 to acknowledge that different shoulder heights to street ratios could be necessary to define the hierarchy of different type of streets in a high density environment. The Council is satisfied that the plan is sound without the proposed changes.

Design Comments to the [full Regulation 19 Representations](#)

[illegible]

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																			determined following a design-led approach as part of a planning application process. On review of the evidence base, we are unable to find any justification for the 32m height restriction in TBZ 18. While we note the Tall Building definitions broadly follow the London Plan, it is unclear how the maximum storey heights have been set. The Tall Building annex provides insufficient detail as to how and why thresholds are set at (for example 32 Storeys or 50 Storeys). This does not pass the soundness test in the NPPF as the approach is not justified. We recommend that the assessment of suitability of locations for tall buildings is revisited. It should be applied consistently and in the context of increasing density in well-connected areas. Specifically for the GLP landholding, the site is extremely well connected to a local centre and existing tall buildings are in the very nearby vicinity. The draft policy should be amended therefore to allow for flexibility in regards to tall buildings. Setting prescriptive heights also impacts the potential of the site to achieve industrial intensification. Draft Policy J2.1 expects all industrial development to actively pursue stacked industrial scenarios. Imposing a maximum height is therefore at odds with the industrial intensification objectives of the draft Plan and London Plan. Both stacked logistics schemes and data centre developments (which are acceptable uses on industrial sites) have greater floor to ceiling height requirements and therefore are likely to exceed the height limits specified. Indeed, there are a number of examples of stacked logistics and data centre schemes in London with heights in exceed of 32m: <ul style="list-style-type: none">• Land at Former Paint Factory, Silvertown (23/01697/OUT LB Newham) where an application for a data centre campus has resolution to grant with heights of up to 65m. A previous withdrawn application on the site for stacked logistics had a height of 42m AOD and was considered acceptable in principle by Council officers and the Design Review Panel.• Land at Former EMR Site, Canning Town (24/00088/FUL LB Newham) where a planning application for a data centre has been submitted with heights of up to 72.3m.• Colt Hayes Digital Park (LB Hillingdon) where an EIA screening opinion for a data centre has been requested which includes heights of up to 58m.• Segro V Park, Grand Union (18/0321 and 19/2732, LB Brent) is a multi-storey logistics scheme which has been completed with maximum heights of 35m. As such, there should be greater flexibility in prescribing height restrictions in designated Tall Building Zones so as not to curtail the possibility for industrial intensification in the form of stacked logistics schemes and data centres and to ensure LB Newham can realise the associated economic benefits.		

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/005-a	Design	D4 Tall buildings			TBZ18: Stratford High Street								No			<p>Inconsistencies with the boundary of Tall Building Zone 18</p> <p>Policy D4 outlines the designated Tall Building Zones within the borough where tall buildings will be acceptable. Whilst the majority of the GLP landholding falls within TBZ 18, but the Mercedes garage (Unit 4) is excluded. This is despite the Mercedes unit falling within the same Local Industrial Location as the remainder of the International Business Park. As the Mercedes unit is within GLP’s ownership, it has formed part of the masterplanning approach to the site as a whole to date.</p> <p>In excluding the Mercedes unit, the extent of TBZ 18 (as shown in Figure 6) [Figure 6 is an Extract of Tall Building Zone 18] prejudices the ability to consider the redevelopment of the site comprehensively and puts the land at risk of becoming an outlier plot in townscape terms, particularly if Rick Roberts Way is re-routed in the future as a potential option. Greater flexibility in design parameters, specifically those regarding height, would prevent this and allow the garage’s redevelopment to come forward as part of a broader scheme of the area’s regeneration, as is expected as part of draft Local Plan Policy BNF.2.</p> <p>As drafted, the TBZ18 policy does not pass the soundness test of the NPPF as there is no clear justification for the exclusion of the Mercedes garage from the TBZ18.</p>	<p>Recommendation: In line with our previous representations to the Regulation 18 Draft Local Plan, we recommend that the boundary of TBZ 18 should be extended to include the Mercedes garage, as shown above in Figure 7 (solid pink line reflects proposed extension to TBZ 18) [Figure 7 is the recommended extension to TBZ 18]. This will encourage the intensification of the Site in its entirety, in line the LIL17: Rick Roberts Way designation and Policy J2.</p>	<p>Due to new evidence on industrial intensification and to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context.</p> <p>With regards to the requirements in J1 and J2 to intensify industrial land, there is potential for intensification of existing floorspace capacity through multi-storey, and more efficient use of land through increased plot ratios in the long term at the site, as informed by the Employment Land Review 2022. Industrial intensification can be supported on the site in line with the Industrial Land and Uses Draft LPG.</p> <p>More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025).</p> <p>Furthermore, we disagree with your view that the policy is not in line with the Local Plan policy BFN2. It is our view that policy BFN2, through a masterplanning process, will support a comprehensive delivery of all sites subject to different physical, environmental and policy constraints.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/005-b	Design	D4 Tall buildings			TBZ18: Stratford High Street								No			<p>[Inconsistencies with the boundary of Tall Building Zone 18</p> <p>Policy D4 outlines the designated Tall Building Zones within the borough where tall buildings will be acceptable. Whilst the majority of the GLP landholding falls within TBZ 18, but the Mercedes garage (Unit 4) is excluded. This is despite the Mercedes unit falling within the same Local Industrial Location as the remainder of the International Business Park. As the Mercedes unit is within GLP’s ownership, it has formed part of the masterplanning approach to the site as a whole to date.</p> <p>In excluding the Mercedes unit, the extent of TBZ 18 (as shown in Figure 6) [Figure 6 is an Extract of Tall Building Zone 18] prejudices the ability to consider the redevelopment of the site comprehensively and puts the land at risk of becoming an outlier plot in townscape terms, particularly if Rick Roberts Way is re-routed in the future as a potential option. Greater flexibility in design parameters, specifically those regarding height, would prevent this and allow the garage’s redevelopment to come forward as part of a broader scheme of the area’s regeneration, as is expected as part of draft Local Plan Policy BNF.2.</p> <p>As drafted, the TBZ18 policy does not pass the soundness test of the NPPF as there is no clear justification for the exclusion of the Mercedes garage from the TBZ18.]</p>	<p>[Recommendation: In line with our previous representations to the Regulation 18 Draft Local Plan, we recommend that the boundary of TBZ 18 should be extended to include the Mercedes garage, as shown above in Figure 7 (solid pink line reflects proposed extension to TBZ 18) [Figure 7 is the recommended extension to TBZ 18]. This will encourage the intensification of the Site in its entirety, in line the LIL17: Rick Roberts Way designation and Policy J2.]</p> <p>Recommendation: A key must be provided to all plans included in the Tall Building Annex which are used to justify policies. The categorisation of the Mercedes Garage should be updated to reflect is similarity in sensitivity to the rest of Rick Roberts Way.</p>	<p>The comment you have provided has not resulted in a change. We did not consider this change to be necessary as the plan is positively prepared and justified.</p> <p>Newham Characterisation Study (2024) and Tall Building Annex (2024) have identified the overarching character of the area and there will always be some exceptions to it. While further analysis has concluded that the Mercedes Site has been incorrectly identified as a brownfield site and that it should have been identified as an industrial site instead, in line with the Travis Perkins and Former Kessler International sites within the GLP ownership, this has not changed the conclusion regarding appropriate heights in this location.</p> <p>The site assessment has been reviewed and, although the site falls within an Opportunity area, in an area of high level of accessibility and in an area not sensitive to change, if it was correctly identified as an industrial site it would have been shown in the sensitivity map of the Tall Building Annex as an area with a consistent building height below 21m, therefore not suitable for tall buildings. Furthermore, due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/005-c	Design	D4 Tall buildings			TBZ18: Stratford High Street								No			<p>[Inconsistencies with the boundary of Tall Building Zone 18</p> <p>Policy D4 outlines the designated Tall Building Zones within the borough where tall buildings will be acceptable. Whilst the majority of the GLP landholding falls within TBZ 18, but the Mercedes garage (Unit 4) is excluded. This is despite the Mercedes unit falling within the same Local Industrial Location as the remainder of the International Business Park. As the Mercedes unit is within GLP’s ownership, it has formed part of the masterplanning approach to the site as a whole to date.</p> <p>In excluding the Mercedes unit, the extent of TBZ 18 (as shown in Figure 6) [Figure 6 is an Extract of Tall Building Zone 18] prejudices the ability to consider the redevelopment of the site comprehensively and puts the land at risk of becoming an outlier plot in townscape terms, particularly if Rick Roberts Way is re-routed in the future as a potential option. Greater flexibility in design parameters, specifically those regarding height, would prevent this and allow the garage’s redevelopment to come forward as part of a broader scheme of the area’s regeneration, as is expected as part of draft Local Plan Policy BNF.2.</p> <p>As drafted, the TBZ18 policy does not pass the soundness test of the NPPF as there is no clear justification for the exclusion of the Mercedes garage from the TBZ18.]</p>	<p>[Recommendation: In line with our previous representations to the Regulation 18 Draft Local Plan, we recommend that the boundary of TBZ 18 should be extended to include the Mercedes garage, as shown above in Figure 7 (solid pink line reflects proposed extension to TBZ 18) [Figure 7 is the recommended extension to TBZ 18]. This will encourage the intensification of the Site in its entirety, in line the LIL17: Rick Roberts Way designation and Policy J2.</p> <p>Recommendation: A key must be provided to all plans included in the Tall Building Annex which are used to justify policies. The categorisation of the Mercedes Garage should be updated to reflect is similarity in sensitivity to the rest of Rick Roberts Way.]</p> <p>Recommendation: The plan shown at Figure 7 (page 93 of part 3 of the Tall Building Annex, no title given) should be updated such that it reflects that the Mercedes garage is part of the existing industrial area, along with the rest of Rick Roberts Way. It is not just ‘brownfield land’ as the plan suggests currently.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary because the policy is positively prepared, justified and effective. Newham Characterisation Study (2024) and Tall Building Annex (2024) have identified the overarching character of the area and there will always be some exceptions to it.</p> <p>While further analysis has concluded that the Mercedes Site has been incorrectly identified as a brownfield site and that it should have been identified as an industrial site instead, in line with the Travis Perkins and Former Kessler International sites within the GLP ownership, this has not changed the conclusion regarding appropriate heights in this location.</p> <p>The site assessment has been reviewed and although the site falls within an Opportunity area, in an area of high level of accessibility and in an area not sensitive to change, if it was correctly identified as an industrial site it would have been shown in the sensitivity map of the Tall Building Annex as an area with a consistent building height below 21m, therefore not suitable for tall buildings. Furthermore, due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/006-a	Design	D4 Tall buildings			TBZ18: Stratford High Street								No			<p>Whilst GLP remain supportive of the continued employment designation for their landholding on Rick Roberts Way, these representations have raised concerns about the overall soundness of the approach to tall buildings, particularly given the conflict with the overarching aims for industrial intensification. These representations advocate a flexible, design-led approach to employment development in Newham. Throughout the representations, suggested amendments to wording and approaches have been recommended in order to ensure that the draft Local Plan can pass the soundness tests set out in Paragraph 35 of the NPPF.</p> <p>In summary, GLP does not support the policies that impose restrictive maximum building heights in areas that are not sensitive to tall building development. This does not make for positive plan making and there is no justification for such a restriction. Maximum building heights should be established through a design led approach at the time of an application. It is only at this time that a sufficient assessment of the context of a site can be robustly undertaken.</p>		<p>Due to new evidence on industrial intensification and to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary because the Plan is positively prepared, justified and effective. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context.</p> <p>With regards to the requirements in J1 and J2 to intensify industrial land, there is potential for intensification of existing floorspace capacity through multi-storey, and more efficient use of land through increased plot ratios in the long term at the site, as informed by the Employment Land Review 2022. Industrial intensification can be supported on the site in line with the Industrial Land and Uses Draft LPG.</p> <p>More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/006-b	Design	D4 Tall buildings			TBZ18: Stratford High Street								No			<p>In the context of the Site, the Draft Local Plan’s Tall Building Zone 18 should extend to include the Mercedes garage east of the International Business Park which also falls in GLP’s ownership. As drafted, the extent of TBZ18 would not pass the soundness test of the NPPF as there is no justification for the current boundary.</p> <p>To conclude, we are grateful for the opportunity to comment on the draft Local Plan and we hope that our recommendations on behalf of GLP are of assistance and will be taken into account by the Council. We would be happy to discuss our comments directly, in order for us to better inform the preparation of the next iteration of the Plan ahead of Examination.</p>		<p>Due to new evidence on industrial intensification and to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary because the policy is positively prepared, justified and effective.</p> <p>Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context.</p> <p>With regard to the requirements in J1 and J2 to intensify industrial land, there is potential for intensification of existing floorspace capacity through multi-storey, and more efficient use of land through increased plot ratios in the long term at the site as informed by the Employment Land Review 2022. Industrial intensification can be supported on the site in line with the Industrial Land and Uses Draft LPG.</p> <p>More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>

Design Comments to the full Regulation 19 Representations																			
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/008-a	Design	D4 Tall buildings			TBZ18: Stratford High Street										<p>[Please see Appendix 1 of representation] 4. Whilst we welcome the London Borough of Newham (LBN) taking a positive and evidence-based approach to identifying tall building areas, our concern is that the Draft NLP identifies overly restrictive height parameters, which are not sufficiently supported by the level of analysis possible in the evidence base documents. This is because the purpose of the evidence base is to provide an overarching review on a borough-wide scale. The purpose is not, therefore, to provide site-specific studies to understand context and capacity, as is advocated in London Plan Policy D3 ‘optimising site capacity through the design-led approach’. This level of detailed site analysis would arise during a formal application and through pre-application engagement. This offers significantly more detail in development management terms and therefore being the place where site capacity and height parameters should be discussed. The evidence base studies as a whole should be regarded as a high-level indication of development potential. They should not be used as a basis to create definitive height thresholds without detailed, site-based analysis underpinning them.</p> <p>5. The issues that we have identified indicate that the Borough is at risk of unnecessarily stymying the future development potential of our client’s site and the wider borough more generally.</p> <p>6. Although Draft NLP Policy D3 states it is consistent with London Plan Policy D3. The London Plan Policy D3 states;</p> <p>B. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling... Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate</p> <p>C. In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way</p> <p>7. NLP Policy D3 says: ‘All new development and extensions should integrate with the wider neighbourhood grain, scale and massing. Density and height increases may be appropriate where it would respect local character and in line with Local Plan Policy D4’</p> <p>8. However, the Tall Building Annex (2024) does not promote higher density necessarily according to whether it is well connected and clearly states on p.19 that ‘existing tall buildings not considered to be justification’. This is contrary to the principles and ethos of London Plan Policy which places much emphasis on an increasing in density in well-connected areas with existing higher density development. There are a number of areas identified in the Characterisation Study as wellconnected local centres with existing taller buildings, for example in West Ham and Plaistow, which are not considered to be suitable for taller buildings in the Tall Building Annex, despite meeting the relevant criteria. As such, the criteria for ‘suitability’ seems to be applied inconsistently and it is unclear why existing tall buildings are not considered to be a justification for height and density, when this would both conflict with London Plan Policy D3 and would presumably curtail retrofit of these existing tall buildings.</p>	<p>The Council considers the policy to be positively prepared, justified and effective. The Council’s objective for this policy approach is to identify locations where tall buildings may be an appropriate form of development in conformity with regional and national requirements. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these location. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>The Council considers the policy is also in line with policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</p> <p>In line with policies D9 and D3, 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. The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note.</p> <p>Therefore, the spatial strategy for the Tall Building Zones results from an evaluation that already addressed design-led approach and optimisation considerations. Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. Your comments on the methodology used to identify suitable locations for tall buildings and maximum parameter heights will be addressed in more detail in the Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/008-b	Design	D4 Tall buildings														<p>[Please see Appendix 1 of representation]</p> <p>9. Furthermore, Policy D4 states: Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below Implementation D4.2: ‘Development of tall buildings outside of the Tall Building Zones will be considered a departure from the plan’ 10. However, this policy wording is not consistent with the ‘Master Brewer case’ [London, R (London Borough of Hillingdon) v Mayor of London] on the interpretation of London Plan Policy D9 which found that tall buildings can come forward outside of explicitly allocated areas, providing they meet the impact criteria set out in Part C of Tall Building Policy D9. By this measure, a tall building located within the Mercedes Garage Site (at heights similar to that dictated by Tall Building Zone 18) warrants a greater degree of flexibility as with regards to the case law above it may satisfy London Plan D9 Part C but would fail draft Newham Policy D4 by virtue of being located outside the allocated zone.</p>		<p>The Council considers the policy to be positively prepared, justified and effective and in conformity with regional and national requirements. In line with policy D9 of the London Plan, tall buildings outside of tall building zones will be considered a departure from the Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. In addition, policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. In line with policy D9, suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets. We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape. he Council considers that this policy approach is sound.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/008-c	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>[Please see Appendix 1 of representation]</p> <p>11. The above is particularly relevant as we have found the application of the 'sensitivity' criteria to be inconsistent between the Characterisation Study (Pages 165-168) and the Tall Building Annex (Page 30).</p>		<p>The Council considers the policy to be positively prepared, justified and effective and in conformity with regional and national requirements. Newham Characterisation Study (2024) and Tall Building Annex (2024) have identified the overarching character of the area and there will always be some exceptions to it. While further analysis has concluded that the Mercedes Site has been incorrectly identified as a brownfield site and that it should have been identified as an industrial site instead, in line with the Travis Perkins and Former Kessler International sites within the GLP ownership, this has not changed the conclusion regarding appropriate heights in this location. The site assessment has been reviewed and although the site falls within an Opportunity area, in an area of high level of accessibility and in an area not sensitive to change, if it was correctly identified as an industrial site it would have been shown in the sensitivity map of the Tall Building Annex as an area with a consistent building height below 21m, therefore not suitable for tall buildings. Furthermore, due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park. The Council considers that this policy approach is sound.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/008-d	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>[Please see Appendix 1 of representation]</p> <p>12. Finally, we would highlight a contradiction within the Characterisation Study whereby it identifies a cluster of buildings along Stratford High Street which are all “Buildings Substantially Taller Than Their Context’ p.165. The tightness of this cluster suggests that the context of prevailing heights is therefore understated and should be held at a higher threshold. This is of relevance due to firstly the inaccuracies in defining the prevailing heights of an area and in defining the character of tall building areas. Moreover, demonstrates a strong precedent for height in the surrounding area which although acknowledged as TBZ 18, does not appear to have carried over into establishing the suitability of height.</p>		<p>The Council considers the policy to be positively prepared, justified and effective. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance.</p> <p>A review of existing heights was part of the methodology to establish the maximum heights and the existing heights map in Newham Characterisation Study (2024) (p.165) recognises the emerging context along Stratford High Street, resulting in designating TBZ18: Stratford High Street as a suitable location for tall buildings.</p> <p>However, the map clearly shows how buildings substantially taller than their context are focused on the northern part of the High Street while the southern part of the High Street is characterised by a lower context, with a few isolated tall buildings. Whilst we acknowledge that consents have been granted to sites in the immediate context of the International Business Park, and that they could benefit from planning consents under the current Local Plan, those decisions are informed by the adopted LLDC Local Plan.</p> <p>The submission Local Plan is setting a new policy direction, as informed by London Plan policy D9, and is seeking to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context.</p> <p>As highlighted in the Tall Building Annex (2024) ‘prevailing heights will help establish a consistent character in line with the existing and emerging surrounding context, from which taller building elements could emerge’.</p> <p>The Council considers that this policy approach is sound.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/008-e	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>[Please see Appendix 1 of representation]</p> <p>13. This introduces a salient point on height parameters which we can find no justification for within the evidence base documents, while we note the Tall Building definitions broadly follow the London Plan, but it is unclear how the maximum storey heights have been set. The Tall Building annex providing insufficient details why thresholds are set at (for example 32 Storeys or 50 Storeys).</p> <p>14. In summary, despite the approach of the draft NLP being broadly positive towards height and density which we believe is crucial for the growth of the borough, we do not believe that the draft policies are consistent with the interpretation of London Plan Policy D9 in established case law or with the emphasis of London Plan Policy D3. This is largely due to the use of the evidence base to set arbitrary height parameters, despite the analysis not being sufficiently detailed to do so.</p>		The Council considers the policy to be positively prepared, justified, effective and in conformity with the London Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. The Newham Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. More details on the methodology used to identify suitable locations and maximum height parameters for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/010-a	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>[Please see Appendix 1 of representation]</p> <p>We consider that the draft NLP Tall Building Zone 18 designation should extend to eastwards to include the whole of the International Business Park, to include the Mercedes garage located to the east of the International Business Park which is also in GLP’s ownership. This Site is in the same ownership and has formed part of GLP’s masterplanning thus far. The hard yet arbitrary boundary of Tall Building Zone 18 therefore prejudices a design led approach to the area’s regeneration. It also limits the ability to provide a cohesive and integrated scheme and emerging townscape moving forwards.</p>	<p>[Please see Appendix 1 of representation]</p> <p>The northern part of GLP’s ownership (Former Kesslers Site and Travis Perkins) is identified as within TBZ18: Stratford High Street Tall Building Zone. This policy describes acceptable heights up to 32m shown in Figure 42 (Tall Building Zones Map). The Mercedes garage is excluded from this which appears unsupported by the evidence base, it should be included for the following reasons:</p> <ul style="list-style-type: none">• The surrounding area has a strong precedent for height. The Tall Building Annex (2024) states; ‘Highly significant is the presence of tall buildings which have emerged in the Stratford and Maryland neighbourhood, with the tallest building - Manhattan Loft Gardens - 143m (43 storeys) tall, marking Stratford International Station and a series of scattered tall buildings along Stratford High Street.’ This emphasises the importance of tall buildings to local character along Stratford High Street.• Throughout the study and exemplified in Figures 1 and 2 below [Figure 1 is Extract from Figure 24 Evaluation: built form quality and character map Tall Building Annex 2024, Mercedes Garage Site circled in blue] [Figure 2 is extract from Fig 26 combined sensitivity map tall Building Annex 2024, Mercedes Garage Site circled in Blue] , The Site of the Mercedes Garage has been incorrectly shaded. On the map in Figure 24 (Evaluation: built form quality and character) the garage is shown as ‘Unbuilt or under construction’. Further other northern portions of the Site (The Travis Perkins and Fromer Kesslers International) are shown as within an area of ‘Less Successful Quality’. Both of these citations are incorrect. Figure 2 below is extracted from Figure 26 of the Tall Building Annex and shows the ‘Combined sensitivity map’. The Mercedes Garage is identified as within an area of no sensitivity.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary because the policy is positively prepared, justified and effective.</p> <p>While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. Your comments on the methodology used to identify suitable locations for tall buildings and maximum parameter heights will be addressed in more detail in the Tall Buildings Topic Paper (2025).</p> <p>Furthermore, we disagree with your view that the policy is not in line with the Local Plan policy BFN2. It is our view that policy BFN2, through a masterplanning process, will support a comprehensive deliver of all sites subject to different physical, environmental and policy constraints.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/010-b	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>[[Please see Appendix 1 of representation] We consider that the draft NLP Tall Building Zone 18 designation should extend to eastwards to include the whole of the International Business Park, to include the Mercedes garage located to the east of the International Business Park which is also in GLP’s ownership. This Site is in the same ownership and has formed part of GLP’s masterplanning thus far. The hard yet arbitrary boundary of Tall Building Zone 18 therefore prejudices a design led approach to the area’s regeneration. It also limits the ability to provide a cohesive and integrated scheme and emerging townscape moving forwards.]</p> <p>Greater flexibility in design parameters particularly those regarding height would prevent the Mercedes site from becoming an outlier plot in townscape terms and allow its redevelopment to come forward as part of a broader scheme of the area’s regeneration, as is expected as part of NLP Policy BN.2.</p>		The Council disagrees with your view that the policy is not in line with the Local Plan policy BFN2. It is our view that policy BFN2, through a masterplanning process, will support a comprehensive delivery of all sites subject to different physical, environmental and policy constraints. The Council considers that this policy approach is sound.

Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/011	Design	D4 Tall buildings			TBZ18: Stratford High Street						No			<p>[Please see Appendix 1 of representation]</p> <p>Townscape Sensitivity</p> <p>20. While there is a consist inaccuracy of the status of the Mercedes Garage throughout the Tall Building Annex (Shown on the Map in Figure 3 [Figure 3 is an extract from Three Mills Character Area Map] as brownfield Land) We broad agreement with the conclusions of the assessment on wider townscape quality and sensitivity identified below in Figure 4 [Figure 4 is an extract from the Three Mills Character Area Sub Area assessment].</p> <p>21. The above identifies a ‘sub character area’ (Three Mills CA05) of low sensitivity and with similar PTAL outputs for individual Sites, including the Former Kesslers, Mercedes Garage and Travis Perkins sites. However, when areas such Tall Building Zone 18 are defined in later maps, they are articulated using existing plot boundaries which is thereby not reflective of the earlier nuance demonstrated when assessing this area. The Mercedes garage site to the south of Rick Roberts Way is omitted despite being in the same ownership, within the same character area and with near identical output in terms of townscape metrics used to the judge the appropriateness of height.</p> <p>22. The Tall Building Annex (Page 32) acknowledges a ‘high level’ assessment of the suitability for tall building development criteria, which have been assessed in the Characterisation Study base analysis. These are:</p> <ul style="list-style-type: none">• 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 <p>23. In comparing the portions of the site within GLP Ownership, they show identical outcomes to the above. The Mercedes Garage is located within a ‘Low Sensitivity to Change’ area, an ‘Opportunity Areas’ (OAs), and a ‘High Public Transport Accessibility’ Level (PTAL 4-6b).</p> <p>24. These outcomes are combined in the Map on Figure 43 which identifies Spatial Hierarchy and identifies the Tall Building Zone up to 40 m which covers Former Kesslers and Travis Perkins areas of the Site, excluding the Mercedes Garage. The above makes clear thar the Mercedes Site should be treated in the same manner as the rest of International Business Park which sit within TBZ 18.</p> <p>25. We believe there is capacity for height at the Mercedes Garage Site, given the correct application of the suitability criteria set out in the Tall Building Annex. The surrounding precedent for height and emerging context of height in this is established by the ‘Existing tall buildings assessment’ p. 11. Figure 18 of the Tall Building Annex demonstrates there are no tall buildings considered to be isolated, however Figure 3 demonstrates there are a selection of Buildings substantially taller than the context nearby. Figure 12 assesses the emerging context and demonstrates that while new buildings are coming forward in this area, none of which would be considered to be either isolated or ‘substantially taller than the context’.</p> <p>26. There is a strong precedent for height along Stratford High Street as exemplified by the designation Tall Building Zone 18. The adjacent site to the east of Rick Roberts Way (LLDC SA.3.6 LBN N8.SA7 Rick Roberts Way) is designated as a</p>	A change to this policy approach has not been made. We did not consider this change to be necessary because the policy is positively prepared, justified and effective. Newham Characterisation Study (2024) and Tall Building Annex (2024) have identified the overarching character of the area and there will always be some exceptions to it. <p>While further analysis has concluded that the Mercedes Site has been incorrectly identified as a brownfield site and that it should have been identified as an industrial site instead, in line with the Travis Perkins and Former Kessler International sites within the GLP ownership, this has not changed the conclusion regarding appropriate heights in this location.</p> <p>The site assessment has been reviewed and although the site falls within an Opportunity area, in an area of high level of accessibility and in an area not sensitive to change, if it was correctly identified as an industrial site it would have been shown in the sensitivity map of the Tall Building Annex as an area with a consistent building height below 21m, therefore not suitable for tall buildings. Furthermore, due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>
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LB Newham Response																
Proposed modifications and explanation																
Representor Comment	‘Transform’ area which establishes the desire for a new urban context and strategic sites which is considered for tall building developments and with height thresholds upto 50m. The Characterisation Study identifies the N8.SA7, the Former Kesslers Site, and the Travis Perkins Site and Mercedes Garage all within the same area marked ‘Not sensitive to change’ (p.146). It is unclear as to why there is a different height threshold than that of the International Business Park despite being closer to a number of more sensitive townscape elements including the Three Mills Conservation Area and the associated listed Victorian sewage infrastructure buildings within its bounds. 27. This Section has set out how an inconsistent approach has been applied to the designation of Tall Building Zone 18 particularly in the consideration of the Mercedes Garage. Our analysis above details how the Site has near identical suitability outputs to those sites adjacent and within the same GLP ownership and have found insufficient justification for its exclusion.															
Complies with Duty to Cooperate?																
Consistent with the London Plan ?																
Consistent with the NPPF?																
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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/013-a	Design	D4 Tall buildings			TBZ18: Stratford High Street												<p>[Please see Appendix 1 of representation] •</p> <p>Reconsider the boundary of the Stratford High Street 18 Tall Building Area to include the Mercedes Garage on Rick Roberts Way.</p>	<p>Due to new evidence on industrial intensification and to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>A change to this policy approach has not been made. We did not consider this change to be necessary because the policy is positively prepared, justified and effective.</p> <p>Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context.</p> <p>With regard to the requirements in J1 and J2 to intensify industrial land, there is potential for intensification of existing floorspace capacity through multi-storey, and more efficient use of land through increased plot ratios in the long term at the site, as informed by the Employment Land Review 2022. Industrial intensification can be supported on the site in line with the Industrial Land and Uses Draft LPG.</p> <p>More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/013-b	Design	D4 Tall buildings															<p>[Please see Appendix 1 of representation]</p> <ul style="list-style-type: none">Height parameters to either be reframed as ‘guidelines’ to guide the urban hierarchy of the borough or to be removed entirely. In the absence of a more detailed study to inform the Local Plan and justify the sites proposed, the responsibility would be placed on any potential applicant to provide the detailed design justification of what sites and quantum of development may be appropriate. This can then be assessed by the borough during the application process.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/013-c	Design	D4 Tall buildings															<p>[Please see Appendix 1 of representation]</p> <ul style="list-style-type: none">• We would recommend the draft Newham Local Plan revisit Policy D4 to be consistent with Master Brewer case.	<p>A change to this policy approach has not be made. We did not consider this change to be appropriate as tall buildings outside of tall building zones will, in line with policy D9 of the London Plan, be considered a departure from the Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. In addition, policy D9 part B (3) clearly states “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” In line with policy D9, suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025).</p> <p>We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with Policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape. The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/016	Design	D4 Tall buildings														<p>[Please see Appendix 2 of representation] The representations outlined how Policy D4: Tall buildings of the Regulation 18 Draft Local Plan places ineffective restrictions on the Site that limit prevailing heights to between 9m – 21m and maximum building heights to 32m. In response to this, the representations advocated a flexible attitude to development that is guided by a design-led approach.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/017-a	Design	D4 Tall buildings														[Please see Appendix 2 of representation] In the context of the Site, the representations stated that the Regulation 18 Draft Local Plan’s Tall Building Zone 18 (‘TBZ 18’) should be amended to omit the specified maximum height of 32m and rather provide the ability for appropriate heights to be established by detailed townscape analysis and technical assessments as part of a planning application.		A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.

Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/017-b	Design	D4 Tall buildings			TBZ18: Stratford High Street				Blank						<p>[Please see Appendix 2 of representation]</p> <p>Moreover, the representations asserted that the extent of the Tall Building Zone should extend further to include the Mercedes garage to encourage the intensification of the Site in its entirety, in line the LIL17: Rick Roberts Way designation and Policy J2.</p> <p>In response to our representations to the Regulation 18 Draft Local Plan, the Council stated they did not consider this change to TBZ 18 “to be appropriate as, based on the methodology used to identify suitable locations and heights for tall buildings, and due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ 18: Stratford High Street designation across the whole of the International Business Park.”</p> <p>The Council’s response also states that, “with regards to the requirements in J1 and J2 to intensify industrial land, this would still be in the context of delivering good, context specific, design that protects the local townscape. Greater levels of intensification could be delivered on the part of the site covered by the 32m tall building designation. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024).”</p> <p>GLP do not agree with the response provided and consider it factually inaccurate. The reasons for this are set out below.</p> <p>[Tall Building Annex]</p> <p>Inaccuracies of the Tall Building Annex</p> <p>There are numerous inaccuracies within the Tall Building Annex which means that it cannot be relied upon for forming policies. In particular, this relates to the Three Mills Character Area, the Built Form Quality and Character map and the Combined Sensitivity map.</p> <p>Three Mills Character Area</p> <p>Figure 8 is taken from the Tall Building Annex, Part 3. For ease, Figure 9 shows the area of which CA05 relates. CA05 identifies a ‘sub character area’ (Three Mills CA05) which includes the Former Kesslers, the Mercedes garage and Travis Perkins. However, when areas such as TBZ18 are defined in later maps, they are articulated using existing plot boundaries which is thereby not reflective of the nuance demonstrated when assessing this character area. The Mercedes Garage is omitted despite being in the same ownership, within the same character area and with near identical output in terms of townscape metrics used to the judge the appropriateness of height.</p> <p>Built Form Quality and Character</p> <p>Figure 24: ‘Evaluation: built form quality and character’ of the Tall Building Annex (2024), shown below in Figure 10 wrongly categorises the garage as ‘Unbuilt or under construction.’ This is incorrect. The Mercedes garage is a fully constructed building and is in use.</p> <p>The Combined Sensitivity Map within the Tall Building Annex (2024) has no key. Irrespective of what the colours of shading relate to, GLP do not agree that the categorisation of sensitivity should be any different for the Mercedes garage than that of the rest of the Site.</p> <p>Without knowing what the shading relates to, it is not clear how this accords with the Council’s response to the Regulation 19 representations made by GLP, nor how the Council have reached any conclusion about sensitivity. This provides further justification that the evidence base has been used inconsistently and is therefore not sound.</p>		<p>Due to new evidence on industrial intensification and to ensure clarity on the policy, the Council has updated its response to this comment.</p> <p>A change to this policy approach has not been made. We did not consider this change to be appropriate as policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Based on the methodology used to identify suitable locations and maximum heights for tall buildings, and due to its proximity to the Three Mills conservation area, the site is not considered suitable to accommodate greater heights. The maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and the gradual transition to the surrounding context.</p> <p>With regard to the requirements in J1 and J2 to intensify industrial land, there is potential for intensification of existing floorspace capacity through multi-storey, and more efficient use of land through increased plot ratios in the long term at the site, as informed by the Employment Land Review 2022. Industrial intensification can be supported on the site in line with the Industrial Land and Uses Draft LPG.</p> <p>More details on the industrial intensification in relation to tall buildings allocations can be found in the Tall Buildings Topic Paper (2025).</p> <p>The Council considers that this policy approach is sound.</p>
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Reg19-E-204	Historic England		Reg19-E-204/002	Design	D4 Tall buildings						Blank	Blank						Blank	We note the various amendments made to the draft Plan in response to the previous public consultation in 2023. In particular, we strongly welcome the amendments addressing our comments including those on policy D4 tall buildings,		Support noted.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/08	Design	D4 Tall buildings			TBZ13: Canning Town											<p>Tall Building Zones</p> <p>Draft Policy D4 (Tall Buildings) defines a tall building in Newham as those over 21m and sets out that tall buildings will only be acceptable in areas designated as ‘Tall Building Zones’ (TBZs). TBZs are shown on the draft Policies map and set out indicative height limits and guidance for tall buildings.</p> <p>We are pleased to see that the Site is now included within TBZ 13: Canning Town, following the request made in our previous representations to the Regulation 18 consultation. Draft TBZ 13 (Canning Town) identifies the zone as being suitable to accommodate a prevailing height between 21m and 32m in the Site’s location. It also states that limited additional tall buildings with elements of up to 50m (circa 16 storeys), could be integrated carefully to aid wayfinding and mark special locations.</p>		Support noted.

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Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/09	Design	D4 Tall buildings			TBZ13: Canning Town											<p>Whilst we welcome the recognition that the Site is suitable to accommodate tall buildings and its inclusion in TBZ 13, we consider it logical that draft Policy D4 fully acknowledges the resolution to grant planning permission (ref. 23/01697/OUT) at the Site, which has robustly assessed the proposed height of three data centre buildings up to 65m AOD in height as acceptable. The Newham officer report states the following at the specified paragraphs:</p> <p>186) Looked at in more detail, while data centre building LYC01 will be 7 storeys (excluding the roof plant) for comparison purposes the 65m height would be the equivalent of a block of 19 storeys (65 / typical 3.5m storey height). Compared with the tower storeys of adjoining schemes, Thameside West is expected to be G+20 storeys high in the quadrant adjacent to the site. Lyle Park is a maximum of 20 storeys.</p> <p>187) Accordingly, the application compares favourably in height terms and will not appear out of place or over dominant of its neighbours. It is noted in this context that the GLA Stage 1 response does not consider there to be an in-principle objection to the proposal in terms of building heights.</p> <p>190) In addition, the applicant has demonstrated that the capacity of the area and its transport network can accommodate the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport. The applicant has provided townscape views of the scheme from key/sensitive locations at street level, and it is demonstrated that the visual impacts on the surrounding areas are acceptable in accordance with impacts criterion in Policy D9 (C). In addition, the applicant has demonstrated that the capacity of the area and its transport network is capable of accommodating the scale of development in respect of access to facilities, services, walking / cycling networks and public transport.</p> <p>191) The clear intention of up to date policy is that, taking the development plan and policy guidance as a whole, including: - the planning benefits of the proposals and - absence of significant adverse harms to amenity, environment and heritage interests (as appraised in the ES and detailed below in this Report), the incorporation of a tall building typology of the type proposed for the data centre buildings can be considered acceptable in principle provided the other criteria of Policy D9 are satisfied.</p>	<p>Given that at paragraph 193 the Council concludes that the other criteria in London Plan Policy D9 have been satisfied, it follows that the approved buildings heights must be acceptable. We consider that TBZ 13 should be amended to include a maximum height of up to 65m in the southern area and indeed for this to be the prevailing height, to reflect the accepted planning position.</p>	<p>The change you have suggested has not resulted in a change. We did not consider this change to be necessary because the policy is positively prepared and justified. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/10	Design	D4 Tall buildings			TBZ13: Canning Town											Recommendation 2: Update TBZ 13 (Canning Town) of Policy D4 to increase the maximum and prevailing height to 65m insofar as the GLP site is concerned.	Suggested track changes to policies: D4: TBZ13: Canning Town Height Range Maximum: 50m (ca. 16 storeys) and 40m (ca. 13 storeys), 60m 65m (ca. 22 20 storeys) and 100m (ca. 33 storeys) in the defined areas Further guidance: Add • In view of the consented context on the GLP Site, prevailing and maximum heights can be up to 65m (ca. 22 storeys)	This wording change is not supported. We did not consider this change to be necessary because the policy is positively prepared and justified. A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan Policy D9. Whilst we acknowledge that consents have been granted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from these consents, these consents were permitted under the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. More details on the methodology used to identify suitable locations and heights for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-206	GLP (Land at Central Thameside West and Former Alnex site)	DP9	Reg19-E-206/23	Design	D4 Tall buildings			TBZ13: Canning Town											Following our previous representations on the Regulation 18 consultation document, we are pleased to see that the Site has been included within Tall Building Zone 13 (Canning Town) and the general direction to support development and growth within the Strategic Industrial Locations.		Support noted.

Reg19-E-207	Unibail-Rodamco-Westfield	DP9	Reg19-E-207/007	Design	D4 Tall buildings			TBZ19: Stratford Central			No	No						<p>The shortcomings of the proposed tall buildings designation in meeting the need for housing and mixed use development in the Metropolitan Centre and the lack of recognition for the established character of the SCE and surroundings, extant consents and its low sensitivity to change</p> <p>In our representations to the Regulation 18 Plan we welcomed the location of the SCE within the Tall Building Zone TBZ19: Stratford Central, whilst querying the maximum height limit, which for Plot M7B at the time was 60m. Whilst we note that Plot M7B now falls within a TBZ with heights ranging up to 100m, this is still short of what the consented WSC Masterplan allows and what we consider this site can accommodate. Furthermore, the PBSA development Plot M2 has recently had a resolution to grant at 85m (AOD) in height by LLDC and still falls within a TBZ where the maximum height is specified at 60m.</p> <p>In light of the conclusions of the evidence base supporting draft Policy D4 (the Newham Characterisation Study (2022)) that the immediate context is not sensitive to change, has a high opportunity for growth and is in the heart of the highest order town centre in the borough, we strongly feel that, given Newham’s significant housing need and the objectives of other parts of the draft Plan, these height limits would overly constrain the opportunity that the SCE presents.</p> <p>This is amplified by the fact that there are a number of tall buildings, both existing and consented, in the immediate vicinity that exceed the specified maximum heights in the Regulation 19 Plan, including many over 100m. These tall buildings have all been considered in detail and found to be acceptable. The LLDC Committee Report assessing the Plot M2 development (ref. 24/00113/FUL) concludes the following as the specified paragraph numbers:</p> <p>10.87. It is considered that the proposed development would make a positive contribution to the surrounding townscape. The proposed development will offer a comprehensive experience from all perspectives. Approaching from the North, it would signify the entrance to the Westfield shopping centre. Its strategic location along Hitchcock Lane ensures that from the East, it overlooks and enhances the safety of a currently neglected thoroughfare.</p> <p>10.88. From the South, the development will be visible when approaching Stratford Cross and Queen Elizabeth Olympic Park (QEOP), and to the West, it will unify currently disparate parts of the public realm. It would serve as a focal point for taxi arrivals at the designated drop-off zone, as well as for pedestrians and cyclists, thereby enhancing connectivity and cohesion within the area.</p> <p>10.93. Officers are satisfied that the BN.5 criteria as discussed above are met. Officers are satisfied that adverse impacts would not arise from the scale, height or massing of the buildings. The Applicant team has responded positively to feedback from QRP and officers, and the design-led approach, informed by early environmental testing, and engagement with a range of groups including women and girls, has led to a scheme that would meet the exceptionally good design quality required by Local Plan policies BN.1, BN.4, BN.5, and London Plan Policy D1.</p> <p>Given the conclusions of the Newham Characterisation Study that the Site is not in a location that is highly sensitive to development of tall buildings and indeed that it is in a location</p>	<p>Recommendation 2: That TBZ19 is amended to permit building heights up to at least the consented masterplan heights and with additional height to be permitted in the core of the SCE around Plot M7B; as shown in Figure 1 below. [Figure 1 shows the suggested TBZ19 maximum building heights]</p> <p>D4 TBZ19: Stratford Central: Height Range Maximum: 60m (ca. 20 storeys) and 100m (ca. 33 storeys) and 32m (ca. 10 storeys) and 150m (ca. 50 storeys) in the defined areas.</p> <ul style="list-style-type: none">• To mark Stratford Station, Stratford International station, Westfield Avenue, Westfield Stratford City and the urban edge of Queen Elizabeth Olympic Park at International Quarter and Stratford waterfront, a limited number of tall building elements of up to 100m (ca. 33 storeys) and up to 150m (ca. 50 storeys) on Plot M7B could be provided.	<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. This included a change to the policy approach to extend the 100m zone to continue the consolidated cluster around Cherry Parks in line with the spatial hierarchy and objectives of the new Local Plan. The Council’s response has not changed.</p>
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																			identified for transformation, the draft Plan’s approach to TBZ maximum building heights should be re-considered. We recommend that TBZ19 is amended to specify greater maximum building height for Plots M2 and M7B, as well as the wider SCE, given the consented context and the opportunity for town centre intensification and housing delivery.		
Reg19-E-217	LLDC		Reg19-E-217/002	Design	D4 Tall buildings														<p>[From 1. 040920 LBN LP Reg 19 response Cover Letter] The overall approach in the policy and the removal of the previous requirement for new buildings to have lower heights than existing buildings in the vicinity are broadly welcomed. However, it is considered important for the Local Plan to retain a degree of flexibility around maximum height restrictions in and around the Stratford Metropolitan Centre area, Stratford Station and areas of transformation as identified in the LBN Characterisation Study (2024), in order to allow for greater height where there will be significant benefit to the townscape and where exceptionally good architecture and public realm and other benefits can be demonstrated and have been tested positively through design review.</p> <p>LLDC’s sites at Stratford Waterfront, Pudding Mill, Bridgewater Triangle and Rick Roberts Way will all deliver major development with significant benefits, including affordable housing, public realm and connectivity improvements. However, as currently drafted, it is considered that enforcing capped height limits in these areas unnecessarily constrains their transformation potential as identified in the LBN Characterisation Study, and that without a degree of flexibility, the policy has the potential to negatively impact the deliverability of these schemes and the realisation of these benefits. Some flexibility is also considered necessary to be consistent with the London Plan’s approach to tall buildings, which requires a design-led approach in determining site capacity.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-217	LLDC		Reg19-E-217/010	Design	D4 Tall buildings			2											<p>[From Appendix 1] The overall approach in the policy and the removal of the previous requirement for new buildings to have lower heights than existing buildings in the vicinity are welcomed. However, it is considered important for the Local Plan to retain a degree of flexibility around maximum height restrictions in and around the Stratford Metropolitan Centre area, Stratford Station and areas of transformation as identified in the London Borough of Newham’s Characterisation Study, in order to allow for greater height where there will be significant benefit to the townscape and where exceptionally good architecture and public realm and other benefits can be demonstrated and have been tested positively through design review.</p> <p>Permitted outline schemes at Pudding Mill and Bridgewater Triangle , and site allocations within the LLDC Local Plan, including Rick Roberts way, which will deliver significant development with associated benefits, including affordable housing and public realm and connectivity improvements, have the potential to be negatively impacted by the proposed policy as currently drafted. in the event that amendments or new planning permissions are sought in order to achieve detailed deliverable schemes without this element of flexibility. Given that these sites are identified as areas to be transformed in Chapter 7 of the Newham Characterisation Study (2024), it is considered that enforcing capped height limits in these areas constrains their transformation potential and ability to deliver the housing required. It is also considered to be in conflict with the London Plan approach to tall buildings, which requires a design-led approach to determining site capacity.</p>	<p>[From Appendix 1] Proposed alternative: 2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below. Where relevant and appropriate to the wider context, developments with tall buildings that exceed these limits will need to demonstrate that the proposed heights will significantly benefit the townscape and deliver exceptionally good architecture and public realm. They will also need to demonstrate other benefits that will be delivered.</p>	<p>This wording change is not supported. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these location. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.” In line with policies D9 and D3, 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. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-218	IXDS	RPS	Reg19-E-218/006	Design	D4 Tall buildings			2			Yes	No						Yes	Taking into account the character of the surrounding areas and the settings of relevant heritage assets, impact on townscape views and the urban fabric, and cumulative impacts of tall buildings, this policy should be updated to reflect the actual heights currently in place or consented for the sites adjacent or near the various tall building zone designations. In addition, the findings of townscape and skyline analysis should be a stronger guiding principle for development proposals than has been drafted.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station.</p> <p>While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate greater height. The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-218	IXDS	RPS	Reg19-E-218/007	Design	D4 Tall buildings			2			Yes	No						Yes	With reference to the Mayer Parry Wharf site, to the west of Bidder Street, it is of note that the Newham Characterisation Study (NCS) places the site within Neighbourhood 4 ‘Canning Town’ and identifies the area as one which is to be ‘transformed’ meaning to “substantially increase developments by introducing new building types with scope to creating a new street pattern/frontage” and to “establish new character following a specific site vision”. This analysis is used as a basis for the allocation of Tall Buildings Zones (TBZs) within Policy D4, i.e. areas where heights of buildings can exceed 21m. The NCS states that “within these areas the location and suitability of isolated tall elements should be assessed on a case by case basis considering their impact on the context and ability to aid legibility of key areas and facilitate wayfinding”.		<p>The site falls within a transform area, and it is indeed included in the TBZ13: Canning Town to recognise its opportunity for growth.</p> <p>However, in relation to a case-by-case assessment to establish the appropriate height, the wording extracted from the paragraph on page 166 of the Newham Characterisation Study has been misinterpreted.</p> <p>Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters.</p>

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Reg19-E-218	IXDS	RPS	Reg19-E-218/008	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes	<p>With regard to the northern part of Tall Building Zone 13 (TBZ13), relating to land to the west of Bidder Street and to the west of Manor Road, Policy D4, Table 1 stipulates that this area is suitable for the delivery of tall buildings with prevailing heights of between 21m and 32m and an overall maximum height range of 50m to the north (at the Mayer Parry Wharf and Manor Road sites) and up to 60m to the south at the Crown Wharf site. Despite this, a mixed use scheme by Barratt Homes within TBZ13 has been approved for the Crown Wharf site, directly south of the Mayer Parry Wharf site, with buildings rising up to 100m (LBN ref: 23/00655/FUL). The same applies for the site of the Manor Road development, also within TBZ13, east of the Mayer Parry Wharf site, which is currently under construction nearing completion (LBN ref: 18/03506/OUT). The height of the tallest element already constructed in the Manor Road development is approximately 110m, considerably higher than its allocated height of up to 50m. Given that the emerging built form of these areas do not reflect the more restrictive height stipulations of TBZ13, the actual appropriate height for the sites adjacent and near the Mayer Parry Wharf site should be considered on a ‘case by case’ basis, as recommended in the NCS. Policy D4 and Site Allocation N4.SA5 would need to be updated to reflect the actuality of the current and emerging situation which is transforming the area differently to what is being recommended.</p>		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station.</p> <p>While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate greater height. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-218	IXDS	RPS	Reg19-E-218/009	Design	D4 Tall buildings			2			Yes	No						Yes	As Policy D4 states, townscape and skyline analysis is required to demonstrate the added value of new tall elements and it is considered that this should be a stronger guiding principle for design within D4 than that of the TBZ height limits, which are considered to be overly prescriptive, particularly in view of the actuality of the current and emerging townscape conditions as discussed above. Furthermore, The NPPF requires building designs to aspire to beauty and Historic England acknowledges that a high quality design can mitigate harm to the setting of heritage assets. As such, the right height for a development is not a definitive matter but one of artistic judgement.		The Council considers the policy to be in conformity with London Plan policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum heights that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. In line with policies D9 and D3, 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 and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations. Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.
Reg19-E-218	IXDS	RPS	Reg19-E-218/010	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes	To demonstrate the point being made with regard to the Mayer Parry Wharf site, expert consultants from Citydesigner on behalf of IXDS Limited have reviewed the key criteria set out in the analysis within the NCS and the draft Local Plan and have carried out initial testing with the help of VU.CITY and Accurate Visual Representations (AVRs). Citydesigner’s findings show that a tall building of high-quality design on the Mayer Parry Wharf site, lower than the adjacent Crown Wharf scheme but higher than 80m would not harm or adversely affect any of the nearby areas of townscape value, heritage assets or distant and local townscape views, both when considered in isolation and cumulatively. The Mayer Parry Wharf site sits on the boundary between the TBZ13 Canning Town and TBZ14 Manor Road and can facilitate a transition in height from one TBZ to the other, taking into account the actual heights of surrounding emerging schemes, whilst improving connectivity and legibility in the area. Citydesigner’s full analysis of this is provided at Appendix A. [see Appendix A]		The information you have provided in Appendix A has been considered. However, the conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered suitable to accommodate greater height.

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Reg19-E-218	IXDS	RPS	Reg19-E-218/011	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes	Taking into account the character of the surrounding areas and the settings of relevant heritage assets, impact on townscape views and the urban fabric, and the cumulative effects on the townscape from already consented and constructed tall buildings, Policy D4 should be updated to reflect the actual heights currently in place or consented for the sites adjacent or near the Mayer Parry Wharf site, of approximately 100m.		A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified. Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate greater height. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-218	IXDS	RPS	Reg19-E-218/012	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes	References to site allocations within the policy should also be corrected to use the N4 (Canning Town) prefix, rather than the N5 (Canning Town and Custom House) prefix, which erroneously reflects the Regulation 18 version of the Local Plan draft.		Typo is noted. This has been rectified by making the following wording change: [This step down should be marked at N54.SA4 Limmo and N54.SA5 Canning Town Riverside where there are limited opportunities for tall building elements up to 60m (ca. 20 storeys).] which is included in the modification table.

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Reg19-E-218	IXDS	RPS	Reg19-E-218/013	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes		<p>Key to modifications: Deletions in striketrough text Additions in <u>underline text</u></p> <p>“D4: Tall Buildings</p> <p>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). 2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as ‘Tall Building Zones’. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below, except where the findings of townscape and skyline analysis clearly demonstrate that a proposed development would not be harmful; and that the buildings would positively contribute to the character of the area; and that there would bring public benefits that would clearly outweigh any harm.</p>	<p>This wording change is not supported. We did not consider this change to be necessary as we consider the policy to be in conformity with the London Plan. Policy D9 in the London Plan requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-218	IXDS	RPS	Reg19-E-218/014	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes		<p>[Key to modifications: Deletions in striketrough-text Additions in <u>underline text</u></p> <p>”D4: Tall Buildings]</p> <p>TBZ13: Canning Town Further Guidance</p> <ul style="list-style-type: none">• Prevailing heights should be between 21m and 32m (ca. 7-10 storeys).• In the north east of the Tall Building Zone, a limited number of tall building elements up to 40m (ca. 13 storeys) could be delivered subject to careful transition to the lower rise residential development to the east.• In the north west of the Tall Building Zone, including on Site N4.SA5, tall buildings with elements up to 100m (ca. 33 storeys) are suitable, reflecting the presence of the completed building of 110m on the Manor Road site and the consented building of 102m on the Crown Wharf site in this part of the Tall Building Zone.• To mark Canning Town station and district centre, tall buildings, with elements of up to 100m (ca. 33 storeys) are suitable. It is considered that the existing cluster should be the highest point and all new tall elements should step down from this central cluster.• This step down should be marked at N54.SA4 Limmo and N5.SA5 Canning Town Riverside where there are limited opportunities for tall building elements up to 60m (ca. 20 storeys).• In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of up to 50m (ca. 16 storeys), could be integrated carefully to aid wayfinding and mark special locations.• 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.• Development should be mindful of height transitions and visual impact when delivering industrial intensification through stacked industrial typology.	<p>This wording change is not supported. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified. Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan. The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate greater height. The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-218	IXDS	RPS	Reg19-E-218/015	Design	D4 Tall buildings			3			Yes	No						Yes		<p>[Key to modifications: Deletions in striketrough text Additions in <u>underline text</u></p> <p>”D4: Tall Buildings]</p> <p>3. All tall buildings should be of high quality design and environmental standards, and: a. address the criteria set by the London Plan Policy D9 section C; and b. achieve exemplary architectural quality and make a positive contribution to the townscape through volumetric form and proportion of the mass and through architectural expression of the three main parts of the building: a top, middle and base; and c. address London Plan Policy D9 section D when tall buildings fall within designated town centres and public viewing galleries at the higher levels might offer an opportunity for a view across the borough and London; and d. be independently assessed by Newham Design Review Panel and any future Community and/or Youth Design Review Panel, appointed by the Local Planning Authority.</p> <p>4. In addressing the relationship of the proposed tall building with its context: a. the footprint of tall building should help to define new green spaces and integrate the development with the existing urban pattern or establish new routes that reinstate historic urban grain; and b. the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street; and c. articulation and set-backs should be used to emphasise the relationship between the horizontal (street context) and the vertical (tall building), and to contribute to securing positive amenity spaces and a suitable microclimate around the building”.</p>	Support noted.

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Reg19-E-218	IXDS	RPS	Reg19-E-218/016	Design	D4 Tall buildings			TBZ13: Canning Town			Yes	No						Yes		<p>[Key to modifications: Deletions in striketrough text Additions in <u>underline text</u></p> <p>”D4: Tall Buildings]</p> <p>Policies Map change: Redesignate the parts of TBZ13 containing N4.SA5 (Canning Town Riverside Site Allocation) and the Manor Road site (subject of LBN ref: 18/03506/OUT) so that they fall within the ‘Tall Building Zone up to 100m’ designation.</p>	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as we consider the policy to be positively prepared and justified.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate greater height. The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/07	Design	D4 Tall buildings			2											<p>Policy D4: Tall buildings</p> <p>Ballymore notes the Council’s definition of a tall building definition as at or over 21m (roughly seven storeys) which is in excess of the minimum height set out within the London Plan, however, we strongly object to Part 2 of the draft policy (as previously raised during Regulation 18 consultation) which states tall buildings will only be acceptable in areas marked on the Policies Map as ‘Tall Building Zones’. This conflicts with the London Plan and fails to recognise the recent London Borough of Hillingdon, R (On the application Of) v Mayor of London EWHC3387 (15th December 2021) case on the application of London Plan Policy D9 where the court determined that tall building proposals do not necessarily have to be located within defined tall building zones in Local Plans, and can be acceptable where they result in public benefits and are in accordance with the rest of Policy D9 and the development plan as a whole.</p>	<p>It is therefore considered that the wording of Part 2 should be amended to be less restrictive on the location of tall buildings, noting the Council’s support for tall buildings within the identified tall building zones, but not seeking to wholly prevent tall buildings outside of these zones where it can be demonstrated that they comply with Policy D9 and the development plan as a whole.</p>	<p>A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.</p>

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/08	Design	D4 Tall buildings			TBZ10: North Woolwich Road											In regard to tall building zone TBZ10: North Woolwich Road (which includes site allocation N3.SA3 Connaught Riverside), the draft policy sets out a ‘suitable’ height range maximum of 50m with prevailing heights between 21m and 32m.	The proposed 50m height limit set out within draft policy D4 does not align with the 16 storey height limit set out within the draft site allocation (N3.SA3 Connaught Riverside) and would be more likely to result in a building of 14 storeys. It is therefore considered that the upper appropriate height limit should be increased to circa 55m to align with the draft site allocation.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be positively prepared because whilst the site allocations give an indicative estimation of number of stories could be achieved for explanatory purpose only, Policy D4 cover all buildings of 21 m, irrespective of use and related floor to floor height. Tall building developments that fall within Tall Building Zones should be developed within the maximum height parameter expressed in meters as per Policy D4. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/09	Design	D4 Tall buildings			TBZ11: Lyle Park West											In regard to tall building zone TBZ11: Lyle Park West, the prevailing heights are identified to be 21m and 32m, with an opportunity to include tall building elements up to 40m. Detailed comments are provided below in relation to the draft Lyle Park West site allocation, and it is considered that the indicative heights identified within draft policy D4 should be updated in line with the adopted site allocation (i.e. indicative height range of 10-12 storeys with capacity for up to 18 storeys in key locations). It is noted that Ballymore has successfully delivered tall buildings at Royal Wharf and Deanston Wharf, at outlined above, which neighbour Lyle park West.	A change to this policy approach has not been made. We did not consider this change to be necessary as, whilst we acknowledge that pre-application discussions have been held with LBN officers, that greater height is permissible under the adopted site allocation and that the site can still benefit from the adopted policy, the discussions are informed by the adopted Local Plan. The more detailed townscape work undertaken to support the emerging Local Plan, as directed by the London Plan (2021), and the agent of change principle raised at regulation 18 from the adjacent Strategic Industrial Location (SIL) agent, demonstrates that greater heights would cause challenges for the delivery of Policy J1 on the adjacent SIL. Therefore, the maximum height parameter on TBZ11: Lyle Park West and N2.SA2 Lyle Park West has decreased at regulation 19 to ensure the existing adjacent SIL is protected and enhanced in line with policy J1. More details on the methodology can be found in the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan is sound without the proposed changes.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/10	Design	D4 Tall buildings												No		<p>It is not appropriate at Local Plan preparation stage to be designing by proxy, restricting heights on sites without any evidenced contextual analysis, or allowing for the proper application of the planning balance which would be considered at development control stage. As mentioned above setting an inflexible maximum height range is also in direct conflict with the London Plan which requires a design led approach to determining site capacity.</p> <p>Ballymore continue to deliver tall buildings to an exceptionally high design standard, exemplified more recently within the completed Royal Wharf and Deanston Wharf developments where building heights up to 18 storeys have been developed, accounting for the principles set out above, emphasising the positive benefit of expertly delivered taller buildings within the area.</p>	Finally, the draft policy should be worded more flexibly, noting that the identified heights are considered to be appropriate for each site, but without directly preventing taller buildings where it can be demonstrated they are of high quality, deliver appropriate public benefits and comply with the development plan as a whole.	A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan Policy D9 which requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of Policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”. 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 (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found in the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025). The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/035	Design	D4 Tall buildings			TBZ18: Stratford High Street											Draft Policy D4: Tall Buildings Draft Policy D4 locates the Site within Tall Building Zone ('TBZ') 18: Stratford High Street. Within the sub-area of the TBZ where the Site is located the maximum height is defined as 40m.		Comment noted.
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/036	Design	D4 Tall buildings			TBZ18: Stratford High Street											The evidence base for Policy D4 (TBZ18: Stratford High Street) was established through two elements of research, as shown on the Evidence Base page of Newham’s website. These two pieces of research were the Newham Characterisation Study and the Tall Building Annex 2024. These are included within an overarching ‘Design’ category which contained four subcategories. The Newham Characterisation Study, revised following Regulation 18 Consultation, sets out an account of the character of Newham. The Characterisation Study is designed to help inform the spatial strategy for the new Local Plan. The study was compiled using data and existing reports, building upon the 2017 Newham Character Study. It has a co-purpose in this regard with the Tall Building Annex outlined below.		Comment noted.

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/037	Design	D4 Tall buildings			TBZ18: Stratford High Street											<p>The Newham Tall Building Annex 2024 supplements the Newham Characterisation Study and was designed to provide a more detailed explanation of where tall buildings might be most appropriate within the borough. The methodology for the Tall Building Annex used a sensitivity screening assessment and scoping exercise to identify suitable areas for tall buildings and inform a tall building spatial hierarchy. The Tall Building Annex was also informed by the revised Newham Characterisation Study.</p> <p>Page 61 of the Tall Buildings Annex includes a map that shows the Proposed Tall Building Zones. The Site is located within the boundaries of TBZ 18, which contains a number of sub areas with different proposed maximum heights. The Site is situated within an ‘up to 40 metres’ sub-area of the Tall Building Zone.</p> <p>We note that a sub-area of TBZ19, which sits to the immediate north of TBZ18 and approximately 70m to the north of the Site, would permit tall buildings of up to 100 metres. This sub-area appears to encompass just three sites, two of which are occupied by existing tall buildings (Stratosphere Tower and Unex Tower) whilst the third is the site of the Stratford Assembly development for which planning permission has been granted for a building of 36 storeys (LLDC ref. 21/00483FUL).</p> <p>Both of these tall buildings sub-areas sit in close proximity to the Stratford St John’s Conservation Area, and both are located in areas that are ‘not sensitive to change’, as shown on map 2 on page 96 of the Tall Buildings Annex. We consider that there is an inconsistency in the approach to these two contiguous proposed tall building sub-areas with regard to the proposed maximum heights.</p> <p>Given that buildings of up to 100 metres are proposed to be appropriate close to the conservation area, and further bearing in mind that 302-312 Stratford High Street has a planning permission for a building significantly above 40 metres at 82.66m AOD (approx. 76m above ground level) (LLDC ref. 22/00098/FUL), we consider that the Site has a comparable status to the adjacent TBZ19 and should be recognised as part of this – i.e. the Site has the same status as the site of the Stratford Assembly.</p> <p>The fact that consent has been granted for an 76m tall building is evidence - because by definition the matter has been carefully considered by a decision maker - that the Site should be in the ‘up to 100m’ zone. There is no explanation of why it has been allocated to an ‘up to 40m’ zone’.</p>	<p>The Council considers the policy to be positively prepared and justified because it is supported by detailed and comprehensive evidence base documents: Newham Characterisation Study (2024) and Tall Building Annex (2024). A review of permitted heights was part of the methodology to establish the maximum heights and the new plan is setting a new policy direction, as informed by London Plan policy D9.</p> <p>Whilst we acknowledge that consent has been granted with tall element at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from this consent, this consent was permitted under the LLDC Local Plan.</p> <p>However, your representation omitted that a new planning application has been submitted [LLDC ref: 23/00456/FUL] for a scheme which has been refused on the ground of overdevelopment and design considerations and which is now subject to an appeal.</p> <p>The submission Local Plan has been informed by a detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights and, due to its location outside Stratford Metropolitan Centre and its proximity to Stratford St. Johns conservation area, the site is not considered suitable to accommodate greater height.</p> <p>Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central (which includes the sites you have referenced) has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster to the surrounding context. The Council considers that this policy approach is sound.</p>	

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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/043	Design	D4 Tall buildings			TBZ18: Stratford High Street											Similarly, as set out above, while the Newham Characterisation Study (p153) identifies the Site to an area of ‘enhancement’, the extant planning permission means that the Site should be considered as being within an area of ‘transformation’. We consider that this would not disrupt the spatial hierarchy informed by the Characterisation Study and the findings of the Tall Buildings Annex set out in the Evidence Base.		<p>The Council considers the policy to be positively prepared and justified because it is in line with Newham Characterisation Study (2024).</p> <p>Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas.</p> <p>Whilst we acknowledge that consent has been granted with tall element at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from this consent, this consent was permitted under the LLDC Local Plan.</p> <p>The state of the application is not considered evidence for defining the character of the site as to be transformed.</p> <p>Based on the borough wide assessment, and as highlighted in the conserve, enhance and transform map at p.153 of the Newham Characterisation Study Chatter 7, part 2, the site falls in an enhance area. Enhance areas are defined at page 151 as “areas of mixed quality where new development can provide positive incremental change to the overall character and that can support a moderate uplift and intensification of the building density and new architectural expressions.”</p> <p>The site falls within the TBZ18: Stratford High Street, recognising its opportunity for growth, albeit through a moderate uplift in density and at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 40m.</p> <p>The Council considers that this policy approach is sound.</p>

Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/044-a	Design	D4 Tall buildings			TBZ18: Stratford High Street								No		The currently drafted ‘up to 40m maximum height’ fails to deliver optimisation of the Site in accordance with London Plan Policy D3, as well as draft Policy D3 and draft Policy BFN1	Based upon an assessment of the evidence, our Client considers that TBZ18 should incorporate the Site into the defined 100 metre area immediately to its north and that the Tall Building Zones map should be amended accordingly.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is positively prepared, justified and in conformity with the London Plan. Policy D3 requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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 already addressed design-led approach and optimisation considerations. Whilst we acknowledge that consent has been granted with tall element at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from this consent, this consent was permitted under the LLDC Local Plan. However, your representation omitted that a new planning application has been submitted [LLDC ref: 23/00456/FUL] for a scheme which has been refused on the ground of overdevelopment and design considerations and which is subject to an appeal. The submission Local Plan has been informed by a detailed townscape analysis which seeks to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context. Based on the sieving exercise undertaken to identify suitable locations for tall buildings and maximum heights and, due to its location outside Stratford Metropolitan Centre and its proximity to Stratford St. Johns conservation area, the site is not considered suitable to accommodate greater height. Due to its emerging context, its Metropolitan Centre nature and its capacity for growth, the TBZ19: Stratford Central (which includes the sites you have referenced) has been identified as the area of maximum capacity in the Borough, with opportunities for tall elements up to 100m. The proposed maximum permissible heights seek to preserve the spatial hierarchy aspiration of the plan and TBZ18: Stratford High Street is considered appropriate for a gradual transition from the higher cluster to the surrounding context. The Council considers that this policy approach is sound.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
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Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/044-b	Design	D4 Tall buildings			TBZ18: Stratford High Street												Furthermore, the Site should be included in an area of ‘transformation’ rather than an area of ‘enhancement’ to better reflect the redevelopment potential of the Site for a tall building.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is positively prepared, justified and in conformity with Newham Characterisation Study (2024).</p> <p>Chapter 07, part 2 of the study sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density in conserve and enhance areas.</p> <p>Whilst we acknowledge that consent has been granted with tall element at greater heights than the heights allowed within the tall building zone designation in the submission plan and that the site can still benefit from this consent, this consent was permitted under the LLDC Local Plan. The state of the application is not considered evidence for defining the character of the site as to be transformed. Based on the borough wide assessment, and as highlighted in the conserve, enhance and transform map at p.153 of the Newham Characterisation Study Chatter 7, part 2, the site falls in an enhance area. Enhance areas are defined at page 151 as “areas of mixed quality where new development can provide positive incremental change to the overall character and that can support a moderate uplift and intensification of the building density and new architectural expressions.”</p> <p>The site falls within the TBZ18: Stratford High Street, recognising its opportunity for growth, albeit through a moderate uplift in density and at the lowest permitted tall building heights in the borough, with opportunities for tall elements up to 40m.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>
Reg19-E-229	Dominus Stratford Limited	Knight Frank	Reg19-E-229/075	Design	D4 Tall buildings			TBZ18: Stratford High Street											However, the wording of the design policies requires further consideration with a greater emphasis required on ensuing the design-led approach to site optimisation of the London Plan is a priority for guiding development. In relation to this, the tall building zone within which our Client’s site at 302-312 Stratford High Street is located should have the maximum height of future development increased from the currently proposed 40m to ensure site optimisation in this highly accessible location is realised and to reflect the extant planning permission at the site for a building which considerably exceeds this.	Furthermore, the Site and the immediate surrounding area, should be identified as an area of ‘transformation’ and not an area of ‘enhancement’ to promote design-led optimisation.	<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is positively prepared, justified and in conformity with London Plan and Newham Characterisation Study (2024).</p> <p>For the reason explained separately in the responses to representations [Reg19-E-229/037, Reg19-E-229/043, Reg19-E-229/044-a, Reg19-E-229/044-b], the site is not considered suitable to accommodate greater height.</p> <p>The Council is satisfied that the plan remains sound without the proposed changes.</p>

Design Comments to the full Regulation 19 Representations																			
Reg19-E-234	Places for London		Reg19-E-234/002	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<p>We consider that the approach to tall buildings on the Limmo Peninsula site as currently set out in Policy D4 of the draft Local Plan is unnecessarily prescriptive and overly restrictive. The proposed maximum 20-storey / 60-metre height cap would constrain the potential for us to bring forward a deliverable high density residential-led development on the Limmo Peninsula site.</p> <p>We suggest the following modifications to draft Policy D4: Tall buildings and Table 1. The amendments reflect our view that building heights above 20-storeys rising up to 30-storeys can be accommodated on the site, as shown in our evidence. We also propose modifications to replace ‘maximum’ heights with ‘appropriate’ heights, in line with London Plan Policy D9 and for the reasons set out above.</p> <p>Policy D4: 2. Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as Tall Building Zones. The height of tall buildings in any ‘Tall Building Zone’ should be proportionate to their role within the local and wider context and should generally not exceed the respective limits appropriate indicative height range set in Table 1 below. Maximum building heights within Tall Building Zones should be robustly tested and established at planning application stage via a detailed and comprehensive design-led masterplanning and testing exercise to ensure compliance with the qualitative criteria for tall buildings.</p> <p>Table 1: Tall Building Zones Appropriate Height Range Maximum 50m (ca. 16 storeys) and 40m (ca. 13 storeys), 60m (ca. 20 storeys) and 100m (ca. 33 storeys) in the defined areas</p> <p>Further guidance Prevailing heights should be between 21m and 32m (ca. 7-10 storeys). <ul style="list-style-type: none"> In the north east of the Tall Building Zone, a limited number of tall building elements up to 40m (ca. 13 storeys) could be delivered subject to careful transition to the lower rise residential development to the east. To mark Canning Town station and district centre, tall buildings, with elements of up to 100m (ca. 33 storeys) are suitable. It is considered that the existing cluster should be the highest point and all new tall elements should step down from this central cluster. This step down should be marked at At N5.SA4 Limmo and N5.SA5 Canning Town Riverside where there are limited opportunities for tall building elements up to where there are limited opportunities for tall building elements up to ranging from 60m to 100m (ca. 20 to 30 storeys). In the rest of the Tall Building Zone, including to mark the new DLR station and local centre at Thameside West, limited additional tall buildings with elements of up to 50m (ca. 16 storeys), could be integrated carefully to aid wayfinding and mark special locations. 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 is acceptable and to avoid any unacceptable adverse impacts does not saturate the skyline. <p>Associated modifications are also necessary to the Tall Building map and site allocation.</p> </p>	<p>The Council considers the policy to be positively prepared and justified as evidenced in the Newham Characterisation Study (2024) and Tall Building Annex (2024) which have been developed in line with London Plan guidance. The policy is also in conformity with London Plan policies D9 and D3.</p> <p>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. The spatial strategy for the Tall Building Zones and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station.</p> <p>While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate the maximum permissible heights on TBZ13: Canning Town.</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Through the tall building assessment and capacity testing of the site, it was concluded that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. More details on the methodology used to identify suitable locations and heights for tall buildings can be found on the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.</p>
Reg19-E-234	Places for London		Reg19-E-234/003	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No		No			Blank	<p>In relation to the NPPF soundness tests, we consider that the maximum 20-storey height limit on the Limmo site is unsound for the following reasons:</p> <ul style="list-style-type: none"> It is not justified - It is not based on appropriate or robust evidence. The Council has not demonstrated that this is the most appropriate strategy taking into account 	<p>The Council considers the policy to be justified because is supported by a detailed and comprehensive evidence base, Newham Characterisation Study (2024) and Tall Building Annex (2024), which have been developed in line with London Plan Guidance. Whilst we acknowledge the emerging built form with the Manor Road</p>

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																			reasonable alternatives and the available evidence and overall planning considerations in this particular context. The height limits entirely disregard the existing and emerging townscape and tall buildings context.in this location.		<p>development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate the maximum permissible heights on TBZ13: Canning Town.</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note.</p> <p>Through the tall building assessment and capacity testing of the site, it was concluded that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. More details on the methodology used to identify suitable locations and heights for tall buildings can be found on the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.</p>

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Reg19-E-234	Places for London		Reg19-E-234/004	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No	No					Blank	<p>[In relation to the NPPF soundness tests, we consider that the maximum 20-storey height limit on the Limmo site is unsound for the following reasons:]</p> <ul style="list-style-type: none">• It is not positively prepared – The 20-storey cap on development heights on the Limmo site would demonstrably fail to optimise the development potential of this substantial 5-hectare vacant brownfield site in view of the site specific opportunities and existing townscape context. This is demonstrated by our evidence detailed below.		<p>The Council considers the policy to be positively prepared because we have adopted an appropriate balance between optimising the use of land and meeting our objectively assessed need of housing. The submission Local Plan is supported by a detailed evidence base to identify suitable locations for Tall Buildings, in line with London Plan Guidance. In line with Policy D9, suitable locations for tall buildings have been identified based on an assessment of existing height, proximity to public transport, impact on open space and heritage assets.</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council considers that this policy approach is sound.</p>
Reg19-E-234	Places for London		Reg19-E-234/005	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No			No			Blank	<p>[In relation to the NPPF soundness tests, we consider that the maximum 20-storey height limit on the Limmo site is unsound for the following reasons:]</p> <ul style="list-style-type: none">• It is not effective or deliverable – the 20-storey cap on development heights would significantly constrain development viability and restrict the quantum of overall and affordable housing that is achievable on the site. This is a key consideration given the site specific development constraints which potentially limit the buildable area and also noting the infrastructure delivery requirements detailed below.		<p>The Council considers the policy to be effective because the plan is deliverable. The Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council considers that this policy approach is sound.</p>

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Reg19-E-234	Places for London		Reg19-E-234/006	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No		No			Blank	<p>The Council has not undertaken a design-led masterplanning exercise to justify the restriction on height. No site specific 3-D modelling or analysis of townscape views has been prepared to justify the Council’s position or to demonstrate that the proposed 20-storey maximum height cap would be the most appropriate approach in terms of townscape, environmental impact, or in terms of delivering a new park.</p> <p>In its evidence, the Council has failed to justify why there should be a significant step down in heights on the Limmo site compared to the existing and planned tall building context, given the particular characteristics, opportunities and constraints on this site.</p>	<p>The Council considers the policy to be positively prepared and justified as evidenced in the Newham Characterisation Study (2024) and Tall Building Annex (2024) which have been developed in line with London Plan guidance. The policy is also in conformity with London Plan policies D9 and D3.</p> <p>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. The spatial strategy for the Tall Building Zones and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station.</p> <p>While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate the maximum permissible heights on TBZ13: Canning Town.</p> <p>The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note.</p> <p>Through the tall building assessment and capacity testing of the site, it was concluded that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. More details on the methodology used to identify suitable locations and heights for tall buildings can be found on the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.</p>
Reg19-E-234	Places for London		Reg19-E-234/008	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No		No			Blank	<p>In light of the above concerns, we would also question the extent to which the proposed approach is consistent with the overarching strategic and national policy imperative to make best use of suitable, available vacant brownfield sites such as the Limmo Peninsula.</p>	<p>The Council considers the policy to be in conformity with regional and national policy requirements because the plan supports effective use of land, by enabling development on a brownfield site which has been set up as a site allocation, N4.SA4 Limmo.</p> <p>The policy is also in line with London Plan policy D3, which requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its</p>

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																					capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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 and the site allocations requirements result from an evaluation that already addressed design-led approach and optimisation considerations. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Building Annex (2024) and Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.

Design Comments to the full Regulation 19 Representations																			
Reg19-E-234	Places for London		Reg19-E-234/009	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<p>The Council’s evidence base</p> <p>The Council’s Characterisation and Tall Buildings studies have been undertaken in a spatial vacuum with the scope of the studies restricted to the borough of Newham only. This is an inappropriate and flawed approach to a site such as Limmo which is located on the far western edge of the borough.</p> <p>Land to the west and south of the Limmo site boundary falls within Tower Hamlets and this has been almost entirely ignored in the two studies, as has the townscape context and potential impact to the south in terms of the River Thames and RB Greenwich.</p> <p>Newham’s tall building study is not supported by massing studies or townscape or visual appraisals. In our view, this should be considered an essential requirement when setting restrictive maximum height caps at plan-making stage on a site of this size and importance in terms of housing delivery, connectivity and place making (both locally and strategically).</p> <p>The proposed maximum height cap of 20-storeys has not been set based on specifically identified development or townscape constraints in terms of LVMF strategic views, local views, designated heritage assets or environmental constraints.</p> <p>The Council’s Characterisation and Tall Buildings zone studies suggest that that maximum heights on Limmo have been set to ‘avoid saturation’, noting that ‘a significant number of tall buildings have already been established’.</p> <p>Concerns regarding the potential ‘saturation’ of tall buildings / ‘saturation of the skyline’ are not substantiated or evidenced in either study in terms of townscape or environmental impacts or harm. The term ‘saturated’ is not defined and is considered to be ambiguous and inappropriate in this context. The drive to restrict heights also seems to be largely driven by the aim to establish a ‘borough-wide spatial hierarchy’. This is an arbitrary and subjective approach which is not supported or justified by any robust evidence and is unsound.</p> <p>The existing context on all sides of the Limmo site is defined by tall buildings and high density residential-led development, as shown below. The constructed building heights on the adjacent sites are as follows:</p> <ul style="list-style-type: none"> • London City Island (Tower Hamlets) – 19, 20, 23, 27-storeys • Good Luck Hope (Tower Hamlets) – 15, 23, 30-storeys • Brunel Street Works (Newham) – 12, 14, 15, 16, 23 and 26-storeys • Manor Road Quarter (Newham) – 30-storeys <p>Newham’s evidence base demonstrably fails to properly take into account or consider the surrounding townscape / development context to the west and south of the Limmo site in terms of building heights.</p> <p>In addition, Crown Wharf (Newham) to the north provides buildings at 8, 9, 15, 17, 25 and 30-storeys (planning permission 23/00655/FUL)</p> <p>Existing tall buildings context surrounding the Limmo site: [See images in representation]</p>	<p>The Council considers the evidence base to be positively prepared.</p> <p>An overarching assessment of the borough in the context of neighbouring boroughs has been undertaken and illustrated in the Tall Building Annex (2024). The study at pag. 20 recognises the southern-western edge of the borough, abutting Greenwich and Tower Hamlets, as the less sensitive to tall buildings.</p> <p>Based on the sieving exercise undertaken to identify suitable locations for tall buildings, N4.SA4 Limmo site allocation has indeed been considered suitable to accommodate tall buildings, albeit not at the maximum height parameters.</p> <p>Whilst we acknowledge the emerging built form with the Manor Road development nearly completed and Crown Wharf site consented at greater heights of the maximum permissible heights, those decisions are informed by the adopted Local Plan.</p> <p>The submission Local Plan has been informed by a more detailed townscape analysis which seeks to set and preserve a borough-wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context.</p> <p>The townscape assessment undertaken to establish the borough-wide spatial hierarchy recognises the cluster of tall buildings established in Canning Town and marking Canning Town District Centre. Within this cluster, Heartwell buildings in the Brunell Street Works complex, has been identified as the tallest building with a height up to 26 storeys, marking Canning Town Station.</p> <p>In line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its location outside of a town centre designation, the site is not considered an appropriate location to accommodate the maximum permissible heights on TBZ13: Canning Town.</p> <p>The Council considers that this policy approach is sound.</p>

Reg19-E-234	Places for London		Reg19-E-234/010	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<p>Montagu Evans Report (Feb 2023)</p> <p>To support our Regulation 18 consultation response, we commissioned Montagu Evans to undertake a detailed townscape and heritage appraisal of the Limmo site. The report demonstrates that additional height up to 30-storeys / 100 metres at Limmo Peninsula would not give rise to any adverse heritage, townscape or visual effects. This assumes an appropriate variation in heights and massing across the site.</p> <p>In contrast with the Council’s evidence base, the Montagu Evans report provides a detailed townscape appraisal that is bespoke to the site, based on an understanding of surrounding receptors, including heritage assets.</p> <p>The Montagu Evans report uses reliable, industry standard VuCity software to establish a zone of theoretical visibility (ZTV) around the Limmo site. In line with best practice, this ZTV is then overlaid with heritage assets and designated strategic and local views to help identify potential visual receptors and viewpoints for testing in terms of the potential impact of tall buildings in this location.</p> <p>Importantly, the ZTV is not restricted to Newham and covers and covers an appropriate range of immediate, mid-range and longer-distance views, as required by London Plan Policy D9. This includes heritage assets and visual receptors within Newham, Tower Hamlets, RB Greenwich. It includes an assessment of London View Management Framework (LVMF) strategic views and consideration of the Maritime Greenwich World Heritage Site and numerous conservation areas within the three boroughs. A total of 25 views are included in the report.</p> <p>The Montagu Evans report shows that buildings up to 30-storeys in height would not actually be visible from a number of the locations in the local and wider area due to the surrounding development context. The report also shows that, where tall buildings would be visible in certain views, they have the potential to contribute positively to the existing and emerging townscape character and skyline and enhance legibility, in line with London Plan Policy D9.</p> <p>The report was finalised in February 2023 and is appended to this representation. This evidence should be considered by the Inspector at Examination in Public (EiP). Montagu Evan’s conclusions are as follows:</p> <ul style="list-style-type: none">• ‘In our view, the site is capable of accommodating buildings in excess of the prescriptive limits expressed in the draft Local Plan and is specifically a location that can accommodate tall buildings up to 30 storeys / 100m as part of a development containing a variety of building heights.’• ‘Identified appropriate heights should be based on a site-specific appraisal. On that basis we strongly disagree that building heights should be limited to isolated heights of 50m and 60m across the entire site, as that does not provide helpful guidance as to the locations of tall buildings and will inhibit the comprehensive planning of tall buildings at Canning Town.’	<p>We note you have provided your initial townscape assessment for your proposal for this site as part of your representation, although a hypothetical level. We consider that a detailed townscape assessment, which illustrates a realistic scheme, will be fundamental in pre-application discussion to determine the most suitable height within the set parameters, in line with part C of London Plan policy D9. However, the Council’s objective for this policy approach is to seek and preserve borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on a borough-wide assessment and capacity testing, our conclusion remains that the site is not appropriate to accommodate the maximum permissible heights on TBZ13: Canning Town. The Council considers that this policy approach is sound.</p>
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Reg19-E-234	Places for London		Reg19-E-234/011	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<p>The report was finalised in February 2023 and is appended to this representation. This evidence should be considered by the Inspector at Examination in Public (EiP). Montagu Evan’s conclusions are as follows:</p> <ul style="list-style-type: none">• ‘In our view, the site is capable of accommodating buildings in excess of the prescriptive limits expressed in the draft Local Plan and is specifically a location that can accommodate tall buildings up to 30 storeys / 100m as part of a development containing a variety of building heights.’ <p>Since the Montagu Evans report was issued, further tall buildings have been permitted in the surrounding context (Crown Wharf) and there are other live applications (eg. Trinity Buoy Wharf). Further details can be provided at EiP stage.</p> <p>Overall, we consider that the potential for a variety of buildings heights above the proposed 20-storey cap and ranging towards 30-storeys is justified and has been demonstrated robustly in our technical evidence. The following key factors and planning considerations are also relevant:</p> <ul style="list-style-type: none">• Limmo is a large (5 ha) strategic site allocation with the potential for good public transport access levels (PTAL) once the Brunel Street Works bridge is delivered.• The site allocation is located within the Royal Docks / Beckton Riverside Opportunity Area where the London Plan (2021) supports the provision of 30,000 new homes and 41,500 jobs and falls within Canning Town Centre. This is a location where the potential for housing provision should be fully optimised.• The Newham Characterisation Study identifies the Limmo site as being a brownfield site which is not in an area which is sensitive to change and is in a location which has a high opportunity for growth.• The site is not located within a conservation area and there are no listed buildings or structures within the site or within close proximity. The closest conservation area to the site is a considerable distance away to the west. The site does not have the potential to impact any local or strategic views.• This is therefore precisely the type of location where housing capacity should be fully optimised in line with London Plan Policies H1, D3, GG2.• Whilst the site is affected by London City Airport, the recommended height restriction to account for this constraint is approximately 30-storeys, so would greatly exceed the maximum height allowance in the draft Local Plan.• This is a very large island site where there is sufficient space to locate tall buildings within the site in a sensitive and appropriate manner without causing any unacceptable adverse wind, daylight or sunlight impacts to surrounding residential homes. The site is of a substantial size (its dimensions are approximately 330 metres in length and ranges from between 50 and 180 metres in width).• In terms of potential residential amenity, daylight and sunlight and wind impacts any tall buildings on the site would be located a significant distance from nearby residential properties. This is due to the site boundaries and relative isolation of the site created by the surrounding waterways, major roads and rail infrastructure. The site is bounded by the River Lea to the west and south; the DLR and Jubilee Lines to the east. As shown in the aerial photograph these boundary features all provide a significant buffer to the closest residential	<p>We note you have provided your initial townscape assessment for your proposal for this site as part of your representation, although a hypothetical level. We consider that a detailed townscape assessment, which illustrates a realistic scheme, will be fundamental in pre-application discussion to determine the most suitable height within the set parameters, in line with part C of London Plan policy D9. However, the Council’s objective for this policy approach is to seek and preserve borough wide spatial hierarchy and create a gradual and sensitive transition to the surrounding context. Based on a borough-wide assessment and capacity testing, our conclusion remains that the site is not appropriate to accommodate the maximum permissible heights on TBZ13: Canning Town. The Council considers that this policy approach is sound.</p>
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LB Newham Response		Proposed modifications and explanation	Representor Comment	Complies with Duty to Cooperate?	Consistent with the London Plan?	Consistent with the NPPF?	Effective?	Justified?	Positively prepared?	Sound?	Legally Compliant?	Implementation text	Justification	Clause	Introduction	Site allocation	Policy	Chapter	Comment Reference	Agent	Representor	Representation Reference
			<p>properties. Underground cables and overhead power lines result in exclusion zone / no build zones running along the eastern site boundary. This would therefore ensure a significant buffer and set back to Brunel Street Works development to the east.</p> <p>Our aim is to bring forward a visually distinctive, dynamic and high quality mixed use development with varied heights on the site which would contribute positively to the legibility, connectivity and townscape character of the area and, importantly, respond to the existing and emerging context and opportunities and constraints on the site.</p> <p>High quality design which is sensitive to its context would be at the heart of our proposals. The development proposal will be subject to robust design scrutiny via an iterative series of pre-application meetings and design review meetings.</p> <p>The proposals would need to comply with the qualitative criteria for tall buildings in London Plan Policy D9 Part C which would ensure the visual, heritage, functional and environmental impact is appropriately scrutinised and considered and to avoid any unacceptable impacts.</p>																			

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-234	Places for London		Reg19-E-234/012	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No						Blank	<p>London Plan Policy D3: optimising development capacity</p> <p>We are also concerned that the 20-storey cap on heights would effectively prevent us from progressing a design-led approach to optimising development capacity in line with the London Plan. In line with London Plan Policy D3, this would necessitate the consideration of different design options to determine the most appropriate form of development taking into account the site’s capacity for growth, existing and planned infrastructure capacity and design quality requirements.</p> <p>This design-led contextual site specific process would be curtailed by a maximum 20-storey height cap which has not been justified or evidenced. Capping the development at 20-storeys on the Limmo site would not support us in helping to optimising the open space provision to address the draft Local Plan requirements. The same quantum of floorspace would be required within a greater development footprint, thereby reducing provision of open space on the site. It is clear that the Council has not engaged in this level of design detail. Site specific above and below ground constraints which dictate where buildings can be located have also not been considered.</p> <p>The requirement for a local park is relevant here. Our experience on other large sites (eg. Earls Court) is that delivering generously sized parks on constrained sites is likely to necessitate a degree of flexibility on height and the provision of taller elements.</p>		<p>The Council considers the policy is in line with London Plan policy D3 which requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of policy D3, 3.3.1 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.”</p> <p>In line with policies D9 and D3, 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 already addressed design-led approach considerations. The tall buildings assessment fed into the site allocations capacity testing which provided the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plans requirements and where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council considers that this policy approach is sound.</p>

Reg19-E-234	Places for London		Reg19-E-234/013	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<div>Deliverability considerations</div> <div>We are concerned that the 20-storey cap on development heights would significantly restrict the quantum of overall and affordable housing that is achievable on the site, taking into account other development and infrastructure constraints which limit the area of the site which can potentially be built upon. There are a number of very significant development constraints and policy expectations which impact the site and need to be considered. This includes:<ul style="list-style-type: none">the requirement for a 2 hectare local parkthe requirement for a new bridge connecting the site to the Brunel Street Works site which needs to pass over the DLR and Jubilee lines.underground high voltage UKPN cables and overhead power lines and pylons which create exclusion / no build zones on the eastern site boundary.Gas and water mains to the south of the site which are subject to easement / exclusion zone restrictions)The requirement to deliver a new river wall and flood defences, with an assumed 18 metre exclusion zone. Planning policy expectations in terms of affordable housing also clearly necessitate a certain quantum of development floorspace on the site to ensure viability and deliverability.</div> <div>Achieving all of these planning policy expectations on this particular challenging site would simply not be viable or deliverable within a 20-storey height cap, given the restricted developable site area and infrastructure requirements. Previous estimates for the new bridge expected it to cost approximately £10 million. This would be alongside the cost of providing a new river wall and river walkway. We cannot find any evidence that the Council has grappled with these site specific viability or delivery challenges when setting the proposed height cap, or other planning requirements (eg. open space).</div> <div>[see image in representation]</div> <div>Our view on deliverability is informed by our experience on other sites across our portfolio in London but also our detailed understanding of the Limmo site which we have been seeking to bring forward as a development for some time. Our previous Feilden Clegg Bradley (FCB) masterplan which was developed in considerable detail and was subject to pre-application discussion with Newham and GLA officers during 2019 and 2020.</div> <div>More recently, our understanding of the viability and deliverability constraints has also been shaped by recent detailed dialogue with bidders as part of our live procurement exercise to find a development partner. Each of the three preferred bidders at this stage has fed into these representations. The details cannot be shared due to it being a live procurement exercise. However, we should be in a position at EiP stage to provide further technical, engineering and viability information to support our view that 20-storeys is not a deliverable maximum height threshold for the site.</div>	<div>We acknowledge the constrained nature of the site and the infrastructure requirements to address open space deficiencies and connectivity. However, we consider that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability. In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan's requirements and, where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed. The Council considers that this policy approach is sound.</div>
Reg19-E-234	Places for London		Reg19-E-234/014	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No					Blank	<div>London Plan policy context</div> <div>London Plan Policy D9 Part B requires local planning authorities in London to set ‘appropriate’ tall building heights within tall building zones. We consider that this provides</div>	<div>A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan policy D9 requires boroughs to identify locations</div>

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
																			<p>flexibility for boroughs to set ‘appropriate’ height ranges (rather than maximum height caps), particularly in tall building zone location such as Limmo.</p> <p>The benefit of a more flexible approach is that this allows for a rigorous testing and justification of the proposed heights via the planning application process, within the general parameters set by policy.</p> <p>We recommend the use of ‘appropriate’ heights, as set out below. In our view, the use of a maximum building height cap should only be required to address fundamental issues which might cap heights, for example, LVMF strategic views or Civil Aviation Authority airport height restrictions.</p> <p>However, if ‘maximum’ height levels are to be set, then this needs to be set at a more appropriate height level which is supported by a robust contextual and technical evidence base in terms of 3-D massing modelling and townscape views testing. This should therefore be at 30-storey in line with Civil Aviation Authority airport height restrictions and in line with the findings of our Montagu Evans report.</p>		<p>where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations. Supporting text of policy D9 part B (2) clearly states “in these locations, determine the maximum height that could be acceptable”.</p> <p>Policy D3 in the London Plan requires a design-led approach to optimise the site capacity 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.” Furthermore, supporting text of Policy D3, 3.3.1 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.” In line with London Plan policies D9 and D3, 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. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed design-led approach considerations. Each assessment of the neighbourhoods is contained in the Newham Characterisation Study (2024) which has been developed in line with the Characterisation and Growth Strategy LPG. More details on the methodology used to identify suitable locations for tall buildings can be found on the Tall Buildings Annex (2024) and the Tall Buildings Topic Paper (2025).</p> <p>Tall building developments that fall within Tall Building Zones should be developed within the prevailing heights and maximum height parameters and will be subject to the impact tests set out in part C of London Plan policy D9 and pre-application discussion to determine the most suitable height within the set parameters.The Council is satisfied that the plan remains sound without the proposed changes.</p>

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Reg19-E-234	Places for London		Reg19-E-234/015	Design	D4 Tall buildings			TBZ13: Canning Town			Blank	No						Blank	<p>Consequences for decision-making</p> <p>There are important planning consequences associated with the proposed 20-storey maximum height cap which need to be considered and understood at the EiP. An application for a building exceeding the proposed 20-storeys or 60-metres in height on this site would be contrary to the draft Local Plan Policy D4 as currently worded. The application would also conflict with the plan-led locational criteria set out in Part B of London Plan Policy D9.</p> <p>There is therefore a significant risk that proposals would need to be considered a departure from the Local Plan maximum heights (and advertised as such) and also partially in conflict with Part B of London Plan Policy D9. This would then weigh against the scheme in terms of the overall planning balance.</p> <p>This poses a significant risk factor for us in bringing forwards a deliverable scheme on the Limmo site as it could jeopardise the delivery of the site, or result in significant planning delays. Hence, why we have commissioned our own evidence and are making representations of this nature.</p> <p>In terms of the soundness of the draft Local Plan, the approach would significantly constrain the delivery of a key strategic site allocation, critical to meeting Newham’s housing requirement. We consider this to be a relevant factor when assessing the overall soundness of the plan and its ability to meet identified housing need.</p>		<p>We acknowledge the constrained nature of the site and the infrastructure requirements to address open space deficiencies and connectivity.</p> <p>However, we consider that we have adopted an appropriate balance between meeting site allocation requirements and ensuring deliverability.</p> <p>In relation to viability specifically, the Whole Plan viability assessment demonstrates that sites can viably deliver the Plan's requirements and, where not, the site allocation will work alongside Local Plan policies H3 and BFN4 which address how the viability of sites, on a case by case basis, will be considered and assessed.</p> <p>The Council considers that this policy approach is sound.</p>
Reg19-E-238	Environment Agency		Reg19-E-238/018	Design	D4 Tall buildings					D4.3									<p>D4: Tall buildings</p> <p>In our Reg 18 response we advised that this policy is amended to note the negative impacts of tall buildings on riparian habitats and the amenity of main rivers. We are pleased to see that an addition has been made in the implementation section of point D4.3 includes the wording which reads ‘Development proposals for tall buildings should avoid overshadowing’.</p>		<p>Support noted.</p>

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Reg19-E-238	Environment Agency		Reg19-E-238/019	Design	D4 Tall buildings				2										We can also see that some of the tall building zones in Table 1 include further guidance on avoiding overshadowing impact on watercourses, such as TBZ15: West Ham Station, TBZ16: Abbey Mills and TBZ18: Stratford High Street. This is positive to see, however it doesn't look like all riverside tall building zones include this guidance. For example, TBZ4: Beckton and TBZ5: Gallions Reach don't seem to include this guidance even though they appear to be next to watercourses		<p>The Council recognises the importance of ensuring the Plan is positively prepared and therefore proposes to support the following modifications, which will be presented to the Inspector for their consideration,:</p> <p>1. Add ["Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on waterspace."] to the following Tall Building Zones:</p> <ul style="list-style-type: none">- TBZ5: Gallions Reach- TBZ6: Albert Island- TBZ8: Store Road / Pier Road- TBZ9: Royal Albert North- TBZ10: North Woolwich Road- TBZ11: Lyle Park West- TBZ13: Canning Town- TBZ14: Manor Road- TBZ19: Stratford Central- TBZ21: Excel West <p>2. Replace the word watercourses with waterspaces to be consistent with the GWS2 's terminology to the following Tall Building Zones:</p> <ul style="list-style-type: none">- TBZ15: West Ham Station- TBZ16: Abbey Mills- TBZ18: Stratford High Street <p>3. Replace the word watercourses with waterspaces to be consistent with the GWS2 's terminology to implementation text D4.3: [As set out in Policies GWS2 and GWS3, tall buildings should also assess the consequent impact on green and water spaces. Development proposals for tall buildings should avoid overshadowing, which can negatively affect plant growth, as well as the quality of existing and proposed public open space, including watercourses waterspaces.]</p>
Reg19-E-238	Environment Agency		Reg19-E-238/020	Design	D4 Tall buildings					D4.3									In our Reg 18 response we stated that 'for sites in locations within Source Protection Zones (SPZs) where groundwater is vulnerable, we recommend an additional point is added to the implementation section for Policy D4 to support the importance of managing risks to groundwater resources associated with deep piled foundations which are typically required for tall buildings. We can see that a new point has been added to the implementation section of D4.3.	This is positive to see however this should be amended to read as follows' Development with tall buildings in locations within Source Protection Zones (SPZs) should preserve, where possible , the groundwater resources. If piling in contaminated and layered ground is necessary, the development should manage the risks on groundwater flow and contamination'. Protecting SPZs is crucial because these areas are set up to safeguard the quality and safety of drinking water sources used for human consumption.	Support noted. However, the Council recognises the importance of protecting Source Protection Zones and, therefore, proposes to support the following modification, which will be presented to the Inspector for their consideration: [Development with tall buildings in locations within Source Protection Zones (SPZs) should preserve, where possible , the groundwater resources. If piling in contaminated and layered ground is necessary, the development should manage the risks on groundwater flow and contamination.]

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/027	Design	D5 Shopfronts and advertising			D5.1			Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Policy D5: Shopfronts and advertising page 86</p> <p>1. Shopfronts and signage incorporated within frontages should be designed in a way that maintains active frontages and that meets all of the following criteria as relevant to the proposal:</p> <p>c. Principally retains visual permeability through the ground floor shopfront by minimising signage and carefully addressing the visual impact of security measures, louvers, shutters and any integrated plant equipment.</p> <p>f. Inset entrances on shopfronts are transparently glazed and well-lit.</p>		Support noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/028	Design	D5 Shopfronts and advertising					D5.1	Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Implementation Policies page 87-88</p> <p>D5.1 Required security measures should be designed to limit their visual impact on shopfronts, and where possible should be internal. Where shutters are necessary, they should be perforated to enable visibility into the shop and passive surveillance. On new developments, internal shutters are preferable, and shutter boxes should be designed in from the outset to avoid them being added retrospectively.</p> <p>To enliven frontages and enable passive surveillance, all retail frontages should provide good visibility and glazing should not be blanked out. At least 50% of the shopfront glazing, and preferably a higher percentage for the doorway(s), should retain transparency during hours of operation. Any shutters used during closing times should also retain a good level of visibility into the unit (e.g. use of perforated shutters). The installation of security glass and steel reinforced frontages will be considered in the context of the impact on the appearance and historic significance of the shopfront.</p>		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/093	Design	D5 Shopfronts and advertising														No comment.		Comment noted.

Representation Reference	Representor	Agent	Comment Reference	Chapter	Policy	Site allocation	Introduction	Clause	Justification	Implementation text	Legally Compliant?	Sound?	Positively prepared?	Justified?	Effective?	Consistent with the NPPF?	Consistent with the London Plan?	Complies with Duty to Cooperate?	Representor Comment	Proposed modifications and explanation	LB Newham Response
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/032	Design	D5 Shopfronts and advertising														The wording used for this policy is supported in principle. However, security measures which are summarised at Part 1c are essential to protect shopfronts and it is unclear what the policy would recommend instead of shutters. At point D5.1 it becomes clearer that security measures should be internally placed and that if shutters are to be used they should be perforated.	At point D5.1 it becomes clearer that security measures should be internally placed and that if shutters are to be used they should be perforated. This wording or wording to this effect should be integrated into the policy wording to make it clearer re what the Council wants for new development.	A change to this policy approach has not been made. We did not consider this change to be necessary as the policy provides proportionate criteria, with additional guidance provided in the implementation text to set out the Council's preferred design approach. This allows for flexibility to be applied in cases where a different design approach is required in response to the circumstances of a site, but which may still demonstrate to the Council that the policy objectives are still being met. The Council is satisfied that the plan is sound without the proposed changes.
Reg19-E-006	Maria Marino		Reg19-E-006/012	Design	D6 Neighbourliness						Blank	Blank						Blank	Here is land of relaxation and disregards of regulations as anyone do what they want (trust me as I'm a local architect) they don't care about submit planning applications and built. or develop without any worries because they know here is not monitoring and people here are most of them travellers not landlords but tenants not settled so no one reports anything . Is quite depressing live and work here and I would like to have some hope with the LP sat least .		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. Where notified, the council will take action where development requiring planning permission has been built without prior permission being given, where it is expedient to do so. Please email any concerns about specific properties to Planning.Enforcement@newham.gov.uk As you may be aware, a range of flexibilities are also provided to homeowners wishing to expand under permitted development rights rules, for which the legislation does not require application of planning policy.
Reg19-E-033	Thames Water		Reg19-E-033/026	Design	D6 Neighbourliness						Blank	No				No		Blank	<p>It is considered that this policy should be made stronger to ensure there is adequate policy protection for Thames Water for the development of neighbouring land uses. This is particularly in relation to the proposed allocation at N17.SA1 Beckton Riverside, which includes residential development as well as a town centre, education, sports and recreation etc. next to Beckton STW.</p> <p>The NPPF sets out at paragraph 193 that: 'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed'</p>	<p>Currently, Draft Policy D6 is not sound as it is not consistent with national policy. The following suggestions are made for Draft Policy D6: Neighbourliness: 'In line with the Agent of Change principle, development for new or re-provided uses that are sensitive to noise and other nuisance must include provide suitable mitigation before development has been completed, for managing the amenity impacts generated by existing lawful neighbours and established land uses'</p> <p>The supporting text to draft Policy D6, recognises that: 'When industrial/employment and residential uses are to be co-located in the same site, or when residential uses are proposed adjacent to a Strategic Industrial Location or Local Industrial Location, a non residential stacked light industrial/employment building is considered the most appropriate typology to provide a buffer for the heavier industrial uses and mitigate any impact on residential amenities.'</p> <p>It is considered that this supporting text to be part of the policy to ensure that SILs – which includes Beckton STW – do not have unreasonable restrictions placed on them as a result of development permitted after they were established.</p>	<p>The Council notes the proposed modification to the first sentence of D6.2. This is not considered necessary for soundness. However the Council understands the reasons for the proposal and considers the inclusion could improve the clarity of application of the agent of change principle.</p> <p>Therefore, if this is further proposed by the Inspector, the Council would be supportive of the following modification being made: 'In line with the Agent of Change principle, development for new or re-provided uses that are sensitive to noise and other nuisance must include provide suitable mitigation, before first occupation of affected development, for managing the amenity impacts generated by existing lawful neighbours and established land uses'.</p> <p>The further suggested change to this policy approach, to bring implementation text into the policy, is not supported. We did not consider this change to be necessary as there may be circumstances where masterplanning processes identify a different approach to buffering to that preferred by the council that may be reasonable and suitable to fulfil the overall objective of the policy for that specific site. The Council is satisfied that the plan remains sound without this proposed change.</p>

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/029	Design	D6 Neighbourliness			D6.1			Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Policy D6: Neighbourliness page 90</p> <p>1. All development is expected to achieve good neighbourliness from the outset by avoiding negative, and maximising positive, social and environmental impacts of its design and function on neighbours on and off the site. This includes a requirement to:</p> <p>a. create a safe and secure environment by reducing the likelihood of antisocial behaviour, promoting public safety (including road safety), improving security and lessening the fear of crime;</p>		Support noted.
Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/030	Design	D6 Neighbourliness					D6.1	Blank	Blank						Blank	<p>[Appendix 1: Supporting Policies Specifically Relating to Crime Prevention Draft Submission Local Plan (Regulation 19 June 2024)]</p> <p>Implementation Policies pages 91-92</p> <p>D6.1 Early consideration of neighbourliness matters will be encouraged through pre-application advice/design review, and as part of masterplanning of large sites where detailed designs will be addressed at a later stage.</p> <p>Development has the potential to positively or adversely affect the level of lighting in the surrounding area, so the lighting scheme should be incorporated into the detailed design process at an early stage. Intensity, colour, scale and glare are all factors to be considered. Sensitively designed lighting schemes should improve accessibility for those with disabilities by reducing glare and excessive contrast. Lighting can support the prevention and detection of crime and anti-social behaviour and improve the perception of personal security, and this should be balanced with the need to avoid light spillage onto urban green spaces to protect biodiversity. Well-designed lighting schemes on commercial properties can help create an attractive night-time townscape and enhance the experience for visitors, whilst avoiding disturbance to residents. The temporary impact of construction works on perceptions of safety will also be important to address through the design of hoardings and the construction and logistics management plan.</p>		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/044	Design	D6 Neighbourliness														Policy Supported.		Support noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/094	Design	D6 Neighbourliness														No comment.		Comment noted.

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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/012	Design	D6 Neighbourliness						Blank	No						Blank	SEGRO welcomes the additional text which recognises the importance of not comprising the current operational functions of employment uses and the viability of industrial intensification, notwithstanding comments made throughout our Regulation 18 representations which raise concerns over the requirement to intensify industrial locations (namely point 5(b)) [see Appended – Regulation 18 Draft Local Plan SEGRO response, ref 5.e.] .		Support noted.

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Reg19-E-112	SEGRO	Gerald Eve	Reg19-E-112/013	Design	D6 Neighbourliness						Blank	No						Blank	<p>[SEGRO welcomes the additional text which recognises the importance of not comprising the current operational functions of employment uses and the viability of industrial intensification, notwithstanding comments made throughout our Regulation 18 representations which raise concerns over the requirement to intensify industrial locations (namely point 5(b)).]</p> <p>SEGRO do however seek to reiterate the representations made to the Regulation 18 version of the Local Plan (part 3(e)) [see Appended – Regulation 18 Draft Local Plan SEGRO response, ref 5.e] which seek to include reference to future operational functions of employment uses.</p>	<p>[Appendix, Regulation 18 Draft Local Plan SEGRO response, ref 5.e:]</p> <p>SEGRO supports the ‘Agent of Change’ approach set out in part (2) of draft Policy D7. In part (1)(b) of draft Policy D7, SEGRO suggests an adjustment to wording to state that new development on or adjacent to designated and non-designated employment locations should ensure that they do not compromise “current and future operational functions of employment uses...”. This is important to ensure that existing industrial sites have the potential to further intensify and grow and deliver much needed industrial space within the borough.</p>	<p>Due to need for clarification, the Council has updated its response to this comment.</p> <p>The Council agreed to take forward the suggested amendment at Reg 18. However, different wording was used than that you had suggested, referring instead to the 'viability of industrial intensification' as a means of safeguarding future employment functionality which aligns with policy J1.</p> <p>The Council notes the proposed modification. This is not considered necessary for soundness.</p> <p>However this policy approach also received comments which raised concerns regarding the extent to which the implementation text supports the need for the agent of change approach to protect the future intensification or changes in use on employment land. The Council recognises the importance of ensuring the Plan is clear in its intended applications and has therefore made the following wording change to the implementation section of D6.2, which is included in the modification table.</p> <p>To secure the long-term viability of new existing and future employment uses on employment land (including intensification in line with Policy J2) floor space and compatibility of proposals close to designated employment land, the policy requires applicants to demonstrate that proposed vulnerable uses (such as residential uses or schools) exposed to the various amenity impacts generated by a range uses on employment land can successfully co-exist long-term in the context of their site, particularly when proposing uses that may be more vulnerable to the amenity impacts, such as residential uses or schools. The area and intensity of amenity impacts will vary between different uses (e.g. a wharf vs. a paper recycling centre). The assessment and mitigations should reflect a reasonable worst case scenario for the baseline amenity impacts (see further in this section) as well as a proportional assessment of amenity impacts from potential future intensification of employment land as part of the lawful intensification of use on SILs and LILs, having regard to national regulatory context and the spatial strategy set out in this Plan.</p>

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Reg19-E-176	Port of London Authority	Capita	Reg19-E-176/005	Design	D6 Neighbourliness			D6.2b			Blank	Blank						Blank	In our response to the Reg 18 consultation, we noted our support for the Agent of Change Principle; however, we have noted that Policy D6: Neighbourliness has not been amended to include a specific reference to the boroughs safeguarded wharves in section 2b of the policy. This is important to ensure the vital need for development proposals located in close proximity to these safeguarded sites are designed to minimise the potential for conflicts of use and preserve the long term viability of wharf operations.		A response to this comment was provided in the Regulation 18 Local Plan Consultation Report. The Council’s response has not changed.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/033	Design	D6 Neighbourliness														The wording of this policy is supported. It is agreed that all development should create positive social and environmental impacts and consider potential impacts on amenity. However, the specific requirement to provide a plant maintenance plan where mechanical solutions are proposed is unnecessary. Where plant is proposed within a development, noise impact assessments are submitted to demonstrate that it will align with LPA’s noise standards. However, requiring the submission of this report to demonstrate that applicants will maintain plant to reduce noise levels is unnecessary.		<p>A change to this policy approach has not been made. We did not consider this change to be necessary as the policy is required to ensure that amenity impacts are mitigated appropriately for the lifetime of the development.</p> <p>Noise mitigations tend to be robust and long-term solutions, but that is not the case for the majority of instances when considering odour mitigation. There will be engineering components, such as the fan that won’t need regular maintenance to operate correctly, however this is only one component of an effective odour control system. Other components, such as carbon filters, baffle filters and bag filters need changing regularly to maintain their efficiency in particulate and grease removal. Filters become less affective as soon as you start using them as they immediately start filling with grease and other contaminants in the extracted air. To maintain effective control these need be cleaned or changed regularly. The cooker hood and ducting within a system also have the potential to hold grease and potentially make it a fire risk if not cleaned regularly. Environmental Health colleagues will require adequate information at planning application stage to make a decision on whether the proposed mechanical plant solution is adequate, and the Plant maintenance plan in this policy facilitates this, proportionate to the type and range of mechanical plant proposed.</p> <p>The Council is satisfied that the plan is sound without the proposed changes.</p>

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Reg19-E-238	Environment Agency		Reg19-E-238/021	Design	D6 Neighbourliness					D6.2									D6: Neighbourliness In our Reg 18 response we said that ‘We are also pleased to see Policy D7.2. advocates Agents of Change, and recommend that the significance of this approach in the context of regulated industry activities and operations is noted in the implementation section for D7.2. This does not appear to have been done		<p>As responded in the Regulation 18 Local Plan Consultation Report, we did not consider this change to be necessary as the policy promotes the protection of employment land, including in the event of intensification in line with J1/J2 policies. Further, the tests for assessing baseline amenity impacts require consideratio of the reasonable worst case scenario, which will necessarily take into consideration the type of economic activity on site and the related regulatory context. The Council is satisfied that the plan remains sound without the proposed changes.</p> <p>However this policy approach also received comments which raised concerns regarding the extent to which the implementation text supports the need for the agent of change approach to protect the future intensification or changes in use on employment land. The Council recognises the importance of ensuring the Plan is clear in its intended applications and has therefore made the following wording change to the implementation section of D6.2, which is included in the modification table.</p> <p>To secure the long-term viability of new existing and future employment uses on employment land (including intensification in line with Policy J2) floor-space and compatibility of proposals close to designated employment land, the policy requires applicants to demonstrate that proposed vulnerable uses (such as residential uses or schools) exposed to the various amenity impacts generated by a range uses on employment land can successfully co-exist long-term in the context of their site, particularly when proposing uses that may be more vulnerable to the amenity impacts, such as residential uses or schools. The area and intensity of amenity impacts will vary between different uses (e.g. a wharf vs. a paper recycling centre). The assessment and mitigations should reflect a reasonable worst case scenario for the baseline amenity impacts (see further in this section) as well as a proportional assessment of amenity impacts from potential future intensification of employment land as part of the lawful intensification of use on SILs and LILs, having regard to national regulatory context and the spatial strategy set out in this Plan.</p>

Design Comments to the [full Regulation 19 Representations](#)

Reg19-E-239	Tate & Lyle Sugars		Reg19-E-239/009	Design	D6 Neighbourliness						D6.2	Blank	Blank						Blank	D6: Neighbourliness & Agent of Change The proper and thorough application of the Agent of Change principle in Newham’s planning decision making is extremely important to our business – it is critical to protecting our future in the borough. We have extensive specific experience in this area of policy.TLS are broadly supportive of policy D6 on neighbourliness and commend the strong focus on Agent of Change. We strongly support the amends made in D6.2 and elsewhere. They provide clear direction on consultation with operators, detailed textual guidance and the insertion of the instruction to assess nuisance/amenity impacts against “reasonable worst case scenarios.” This is a sensible clarification of the policy and will hopefully ensure applicants properly fulfil their agent of change obligations. Ultimately this is good for both future residents and current businesses in Newham. We very much hope this will solve the problem outlined in our previous correspondence where we experience some applicants carrying out noise or dust monitoring either at times when the factories were not operating (such as bank holidays), for insufficient periods of times (such as a single 24 hour period) and/or ignoring critical information provided (for example, monitoring should take place when a ship is unloading on the jetty). The insertion of the phrase “reasonable worst case scenario” is particularly helpful in solving this problem. However we do believe there is a need for some further strengthening of the Agent of Change, specifically in reference to SIL land.	The most relevant part is on page 92, under policy D6.2. We would suggest the following addition in red: When assessing baseline amenity impact generated by existing uses, applicants should ensure that the testing undertaken reflects a reasonable worst-case scenario. Engagement with operators is strongly recommended to ascertain: · The busiest times of the week/day to undertake monitoring (e.g. when a ship is unloading on the jetty, or when a large event is planned at a sporting or cultural venue), and whether more than one recording interval is recommended. And · Any increases in intensity of operation that may reasonably take place within both the margins of existing planning permissions, e.g. a shift to 24/7 operation, and a reasonable worst case land use on SIL . TLS would draw specific attention to policy E5 of the London Plan as justification (TLS emphasis added) and ask this is carefully considered D Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. In our previous submission (in the appendix) we drew attention to our own experiences as an industrial land owner and operator at the Thameside East SIL over how operations can wax and wane over the long term and similarly industrial tenants can come and go. This renders snapshot assessments in relation to SIL and Agent of Change as inappropriate. We would give a further example of the Peruvian Wharf land at Thameside West SIL. This patch of land was a sugar refinery established in 1881. By the late 20th Century most of the activities aside had been consolidated at Thames Refinery, aside from Golden Syrup manufacture and some speciality product manufacturing. In 2000 most of the land was sold by Tate & Lyle. Sadly, it lay vacant for 18 years, during which time several inappropriate residential led developments were proposed and bold claims were made by residential developers to planners that it would never return to industrial use. Nonetheless in the last 5 or so years two safeguarded wharves have successfully re-opened: a soil remediation operation and a concrete batching plant. The majority of the land was sold to an industrial developer, in reputedly one of the highest value transactions for SIL land ever recorded in London, who initially proposed a multi storey warehouse and has recently received planning permission for 3 huge data centres (see 23/01697/OUT). We hope this provides further direct local evidence as to how SIL sites, or parts thereof, can be temporarily vacant, undergoing refurbishment, caught in legal or planning battles, and/or take time to transition from one use to another. We believe this is why the extra text suggested is necessary to protect the long term viability of SIL as a protected reservoir of land for the types of activity that are inappropriate elsewhere.	The Council’s objective for this policy approach is to support the intensification of employment land in line with the spatial strategy set out in the Plan, while securing good quality of amenity mitigation for development in its proximity. The Council considers that policy part 2b already seeks to secure the viability of industrial intensification on employment land, which is consistent with the approach set out in spatial policies of the Plan. However, the Council recognises the importance of ensuring the Plan is clear in its intended applications of the agent of change and related reasonable worst case assessment in relation to the spatial strategy for industrial intensification and has therefore made the following wording change to the implementation section of D6.2, which is included in the modifications table. To secure the long-term viability of new existing and future employment uses on employment land (including intensification in line with Policy J2) floorspace and compatibility of proposals close to designated employment land, the policy requires applicants to demonstrate that proposed vulnerable uses (such as residential uses or schools) exposed to the various amenity impacts generated by a range uses on employment land can successfully co-exist long-term in the context of their site, particularly when proposing uses that may be more vulnerable to the amenity impacts, such as residential uses or schools. The area and intensity of amenity impacts will vary between different uses (e.g. a wharf vs. a paper recycling centre). The assessment and mitigations should reflect a reasonable worst case scenario for the baseline amenity impacts (see further in this section) as well as the potential for intensification of amenity impacts as part of the lawful and planned intensification of use on SILs and LILs, having regard to national regulatory context and the spatial strategy set out in policy J1 of this Plan.
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Reg19-E-006	Maria Marino		Reg19-E-006/006b	Design	D7 Conservation Areas and ATVs						Blank	Blank						Blank	[For example I don't understand why I the LP proposals unified two conservation areas in Forest Gate depriving Manor Park from the only one existent and not creating any other .] I didn't see any proposal to create a Conservation Area either in Manor Park or East Ham , please let me know if I'm wrong.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The process of designating conservation areas is governed by separate legislation to that of plan-making, specifically the Planning (Listed Buildings and Conservation Areas) Act 1990. As such the Local Plan cannot, and has not proposed any changes to established conservation areas. Rather, parts of the borough with a similar characteristic have been grouped in the Neighbourhoods section of the Plan in order to facilitate delivery of the local vision for the area. The Local Plan Policy D7 requires the conservation of existing Conservation Areas and supports the potential for creating new ones.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/095	Design	D7 Conservation Areas and ATVs														No comment.		Comment noted.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/045	Design	D8 APAs														Policy is Supported. Lady Trower Trust Playing Fields is located within a Tier 1 Archaeological Priority Area. Requirement for Desk Based Assessment in line with paragraph 194 of the NPPF.		Support noted.
Reg19-E-006	Maria Marino		Reg19-E-006/011	Design	D9 Designated and non-designated heritage assets						Blank	Blank						Blank	The little historic asserts here not listed or are but der elected and unloved , no areas of proteccion historique despite de archeological asserts , nor proposal to included assets to be listed . The ones we have as urban references in the area we live (using Chueca Goitia expressions) has been destroyed to create shops and venues or transformed to recreate the dominants cultures deformed the enghish heritage and no one's cares .		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The process of designating heritage assets of national significance is governed by separate legislation to that of plan-making, and the designation process is managed by Historic England. Further, the Council maintains a register of locally significant buildings and structures, and will regularly seek to retain heritage value of non-designated assets through its development management processes. The Local Plan requires the protection of designated and non-designated heritage assets, in line with the NPPF approach.
Reg19-E-083	Aston Mansfield	Savills	Reg19-E-083/096	Design	D9 Designated and non-designated heritage assets														No comment.		Comment noted.
Reg19-E-202	The Silvertown Partnership LLP	DP9	Reg19-E-202/034	Design	D9 Designated and non-designated heritage assets														In principle, the policy aspirations to ensure that designated heritage assets will be conserved and enhanced is acceptable. The detail provided in Part 1 which states that development should secure viable, sustainable and appropriate futures for all heritage assets within the scope of the site, particularly where they are on the Historic England's Heritage at Risk Register is also supportable and reflects the collaborative approach taken in relation to the Grade II listed Silo D.		Support noted.

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Reg19-E-222	Ballymore	Rolfe Judd	Reg19-E-222/11	Design	D9 Designated and non-designated heritage assets														Policy D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens Ballymore supports the Council’s desire to protect designated heritage assets across the Borough. During the previous consultation for the Regulation 18 plan, we noted that the (then) Policy D10, should be amended to reflect the NPPF (paragraphs 199-202) in that less than substantial harm to designated heritage assets may be acceptable when appropriately outweighed by the public benefits of a scheme, rather than the previous draft wording which sought to resist any level of harm. We note this has been amended, which we support, recognising that some harm may be necessary or unavoidable to support the redevelopment of strategic sites and deliver wider public benefits.		Comment noted.
Reg19-C-009	Hafsa Shehzad		Reg19-C-009/001	Homes	H2 Protecting and improving existing Housing						No	No						No	The local plan does not cover extension to existing housing. This is imperative eg under permitted development, houses built after a certain time can now have a double storey rear extension. The plan does not cover anything for this at all. The London plan states - Policy D3 Optimising site capacity through the design-led approach. Where is the approach for existing homes and their ability to extend with double storey rear extensions and maximising site capacity? There is a massive need in Newham for double storey rear extensions as families need the space, but there is nothing in the plans for existing homes and their extensions.	The plan needs to give detailed advice on how it will support double storey rear extensions and loft conversions and for maximising the space in existing residential homes.	A change to this policy approach has not been made. The Council considers that we have adopted an appropriate balance between providing clarity on design considerations that the Council will apply in relation to extensions, and meeting our objectively assessed need for family housing. The policy criteria set within policies D1, D3 and D7 are considered effective at addressing the design quality for a range of small scale developments, including two storey and loft extensions, while having due regards to each site’s unique context and potential impacts. Further design guidance to support small sites coming forward is provided in the Small Sites Intensification Guidance 2024. The Council is satisfied that the plan remains sound without the proposed change.
Reg19-E-044	National Grid	Avison Young	Reg19-E-044/015	Design							Blank	Blank						Blank	Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET infrastructure. NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.	Therefore, to ensure that Policy D1 Design Standards is consistent with national policy we would request the inclusion of a policy strand such as: “taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.”	This wording change is not supported. We did consider this change to be necessary as all major development proposals are required through policy W4.1 to undertake early engagement with utility providers to ensure there is no impact to existing utility assets. As the plan is applied in the round, we do not consider it beneficial to repeat the requirement as part of policy D1. Further, any site allocation with existing utilities infrastructure include under the design principles the requirement for design and layout to account for these site constraints, which must be duly considered during the masterplaning stage. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-061	Royal Docks Management Authority		Reg19-E-061/003	Design							Blank	Blank						Blank	6. There is limited industrial maritime heritage around the Royal Docks. This could be retrofitted to provide that look and feel of this historical maritime location. The cranes in the Docks were shipped down from Hull for this reason, so there is precedence in this area. Potential heritage items would be much smaller, but dotted about in appropriate locations, like pieces of art.		These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. The potential interventions you have raised can be considered through the framework provided by policies D2, D7, D8 and D9, as relevant to proposals when they are submitted.

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Reg19-E-081	Metropolitan Police Service - Designing Out Crime		Reg19-E-081/010	Design							Blank	Blank						Blank	4) We would recommend any Policies that propose changes/improvements to the below areas also reference early engagement with the CTSA's: [- Crowded Places - Transport Infrastructure - Class A Licenses Premises - Utilities - Storage of Hazardous Materials] - Iconic Buildings and; [- Tall Buildings]	[An example would be Policy HS2: Managing new and existing town and local centres (pages 124-125) where this could be referenced in the Policy itself Section 9 (page 125) or within the Implementation Section HS2.9 (page 134).]	A change to this policy approach has not been made. We did not consider this change to be necessary as the proposed modification to implementation section for policy D1.3 sets out the need to engage with the Counter Terrorism Security Advisors where this has been identified as relevant. This is the most appropriate way to address these matters in all circumstances that involve operational development. Further, it is not possible to clearly define what 'iconic' means, as the significance different communities may attribute any one building may change over time. The Council is satisfied that the plan remains sound without the proposed changes.
Reg19-E-195	St William Homes LLP	Quod	Reg19-E-195/022	Design															4 Design 4.1 As noted at Regulation 18 stage, St William places great emphasis on high quality design. We create bespoke masterplans which are designed in collaboration with local stakeholders and ensure each site is delivered with a design led approach responding to the individual opportunities and constraints that exist on each site. This approach and commitment to delivery high quality homes and sustainable places is demonstrated through St William's track record. 4.2 St William therefore agrees that the design process is a key aspect of delivering successful places and that this should be considered from the start of the development process.		Support noted.

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod	Reg19-E-203/001b	General				TBZ18: Stratford High Street											<p>As shown in Figure 5 [Figure 5 is an extract from the Design and Access Statement submitted with application ref. 23/00457/FUL], the proposed redevelopment of the former gasworks site incorporates buildings of a significant scale and height, with the tallest building proposed to stand at 61.705m. To note, the height of the tallest building proposed has been increased as part of the ongoing determination of the application from 13 storeys to 17 storeys following comments from LLDC design officers. This demonstrates that this part of the site, on the corner of Rick Roberts Way adjacent to the Mercedes Garage, is not considered sensitive to tall buildings of in excess of 50m.</p> <p>At Appendix 3, we have included a summary of the surrounding planning context. This clearly demonstrates that developments of substantial scale and height have been approved in the local vicinity and reflects the evolving nature of the local context which comprises a number of tall buildings. This is also reflected in the Tall Building Annex (2024) which supports the Regulation 19 Local Plan, with page 11 stating that ‘Highly significant is the presence of tall buildings which have emerged in the Stratford and Maryland neighbourhood, with the tallest building - Manhattan Loft Gardens - 143m (43 storeys) tall, marking Stratford International Station and a series of scattered tall buildings along Stratford High Street.’ The Tall Building Annex considers the emerging context and notes that the new buildings coming forward would not be isolated or ‘substantially taller than the context’, thus recognising that the prevailing context supports taller buildings.</p> <p>It is also pertinent to consider the implications of the Master Brewer case [London, R (London Borough of Hillingdon) v Mayor of London 2021] which is in regards to the interpretation of London Plan Policy D9. The case found tall building proposals do not necessarily have to be located within defined tall building zones. Rather, they can be acceptable where they are in accordance with the development plan as a whole and result in public benefit. However, any such tall buildings should have full regards to Policy D9 of the London Plan. By this measure, tall buildings can come forward on Rick Roberts Way and in the surrounding vicinity, even if not in an allocated tall building zone, provided they meet the tests of Policy D9. Therefore, there is scope for further development of substantial development in the nearby area, further altering the context.</p>	<p>The Council considers the policy to be positively prepared, justified and effective. While we have taken into consideration your information, our conclusion remains that, in line with the methodology used to identify suitable locations and heights for tall buildings across the borough, and due to its proximity to the Three Mills conservation area, it is not considered appropriate to extend the TBZ18: Stratford High Street designation across the whole of the International Business Park.</p> <p>Whilst we acknowledge that a scheme has been submitted with tall elements at greater heights than the heights allowed within the tall building zone designation in the submission local plan, and that the applicant could benefit from planning consent under the current Local Plan, the discussions are informed by the adopted Local Plan.</p> <p>The Master Brewer Case took place in the context of a Local Plan produced before the London Plan 2021. The submission Local Plan is setting a new policy direction, as informed by London Plan policy D9, and is seeking to set and preserve a borough wide spatial hierarchy, avoid the scattered composition of tall buildings developed in the past years around Stratford and create a gradual and sensitive transition to the surrounding context and heritage asset on Abbey Lane.</p> <p>We do acknowledge there may be exceptional circumstances where through a detailed townscape and impact assessment a development that complies with policy D9 part C of the London Plan (2021) but was outside of a Tall Building Zone could be considered acceptable if it was demonstrated that the impact on the townscape was acceptable and if the public benefits delivered would outweigh any potential harm caused to the townscape. The Council considers that this policy approach is sound.</p>	

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Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/009	General															<p>[Please see Appendix 1 of representation]</p> <p>Accessibility</p> <p>15. With regards to accessibility and good housekeeping, the evidence base documents can be accessed online. However these are split into multitude of different parts which makes reviewing these documents both confusing and frustrating. The 11 Chapters of the Characterisation Study are split across 13 documents and Tall Building Annex 2024 sections A-C over 5 separate PDF's.</p> <p>16. There is also a palpable difficulty in reading the maps within Tall Building Annex, both for their poor resolution and formatting but also due to the lack of key which results in an ability to properly understand the factors being assessed, particularly in regard to sensitivity and suitability mapping.</p> <p>17. Policy D3 references 'transform, enhance, conserve areas' we note the definitions provided on Page 152, but it is unclear how these are defined specifically in relation to the policy.</p>		<p>Newham Characterisation Study (2024) and Tall Building Annex (2024) represent a comprehensive borough-wide assessment. Therefore, due to the file size the documents had to be split into different parts.</p> <p>In relation to your comment about the reference of transform, conserve and enhance areas, Newham Characterisation Study, Chapter 07, part 2, sets out the borough-wide approach to intensification, which directs major regeneration to areas identified as to be transformed and moderate uplift in density to conserve and enhance areas. Based on the borough-wide character assessment and capacity for growth, the objective of policy D3 is to introduce clear quality criteria to be met in order to respond to the three categories - transform, conserve and enhance - identified in Newham's context. Therefore, Policy D3 should be read in conjunction with the Newham Characterisation Study.</p>
Reg19-E-203	GLP (International Business Park, Rick Roberts Way)	Quod (Iceni)	Reg19-E-203/012	General															<p>[Please see Appendix 1 of representation]</p> <p>28. It is acknowledged that local plan policies need to be evidenced based and we welcome the detailed analysis that has underpinned the development of the NLP. We have found insufficient evidence with regard to the townscape analysis of the area, which has the potential to undermine the delivery of new development supported by Draft Local Plan Policies.</p> <p>29. However, due to the nature of the evidence base taking a borough-wide view, we do not believe the draft NLP can be sufficiently detailed to define specific heights due to the lack of site-based analysis which would be expected as part of master planning exercises or site proposals, rather than in the broader characterisation studies.</p>		<p>The Council considers the policy to be positively prepared and justified because it is supported by detailed and comprehensive evidence base documents: Newham Characterisation Study (2024) and Tall Building Annex (2024) which have been developed in line with London Plan guidance.</p> <p>In line with policies D9 and D3, locations and maximum height parameters for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. The tall buildings assessment fed into the site allocations capacity testing which provide the housing capacity figure that has informed the housing trajectory, this is set out within our Site Allocation and Housing Trajectory methodology note. Therefore, the spatial strategy for the Tall Building Zones results from an evaluation that already addressed design-led approach and optimisation considerations.</p> <p>More details on the methodology used to identify suitable locations and maximum height parameters for tall buildings can be found in the Tall Building Annex (2024) and in the Tall Buildings Topic Paper (2025). The Council considers that this policy approach is sound.</p>

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Reg19-EC-003	Muhammad Uddin		Reg19-EC-003/008	Design							Yes	Yes						Yes	n/a	<p>[I am writing to provide feedback and suggestions for the ongoing consultation of the Newham Local Plan. I commend the Council's efforts to address the diverse needs of Newham's communities, and I hope the following recommendations will further enhance the inclusivity and effectiveness of the plan.]</p> <p>8. Place-making and naming conventions</p> <p>There should be more done in the Local Plan to encourage developments to include places where people feel connected and that names reflect local communities.</p>	<p>These comments do not relate to the tests of soundness and it is considered that this policy approach is sound. Street naming is not a planning consideration. Please refer to the London Borough of Newham Street Name and Numbering Policy Guidelines – Updated September 2021, which includes consideration of the use of names of local people that have cultural significance. The Street Naming and Numbering team can be reached through email at snn@newham.gov.uk</p>