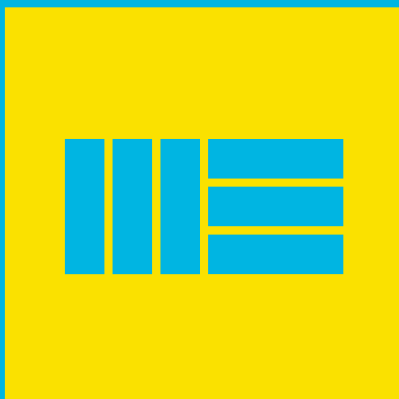


HEARING STATEMENT PREPARED ON BEHALF OF ANJUMAN-E-ISLAHUL- MUSILMEEN

**LONDON BOROUGH OF NEWHAM LOCAL PLAN
SUBMISSION STAGE (REGULATION 22)**

MATTER 3 - QUESTION 3.2

NOVEMBER 2025



INTRODUCTION

- 1.1 This Hearing Statement is prepared by Montagu Evans LLP on behalf of Anjuman-e-Islahul-Muslimeen of (London) UK ('AeIM') for the forthcoming examination of the London Borough of Newham ('LBN') Draft Submission Local Plan (Regulation 19) June 2024 ('the Draft Plan').
- 1.2 AeIM are the owners of most of the land allocated as 'N7.SA1 Abbey Mills' ('N7.SA1'), which is the only allocated site within 'TBZ16: Abbey Mills' ('TBZ16'), one of the Tall Building Zones ('TBZ') identified under Draft Plan Policy D4 (**Figure 1**).
- 1.3 The context for AeIM's participation in this examination is its formal engagement with LBN to agree a clear, coordinated approach to the development of AeIM's Site ('the Site') consistent with a sound spatial strategy for Newham. A pre-application meeting was held with officers on 30 October 2025, where a Masterplan was presented alongside evidence to substantiate its density and height parameters. We advised on the capacity testing underpinning the Masterplan and assessed its acceptability through a preliminary Heritage and Townscape Visual Impact Assessment, which supported the discussion with LBN. The Masterplan, summary context analysis and selection of key views is provided in **Appendix 1**.
- 1.4 This Statement addresses Question 3.2 of Matter 3 (Spatial Strategy).
- 1.5 The Site's suitability for tall buildings under emerging Policy D4 is also relevant to the allocation of N7.SA1 and the Inspector's questions in relation to it under Matter 4, which addresses the capacity of the site and its contribution to housing land supply.

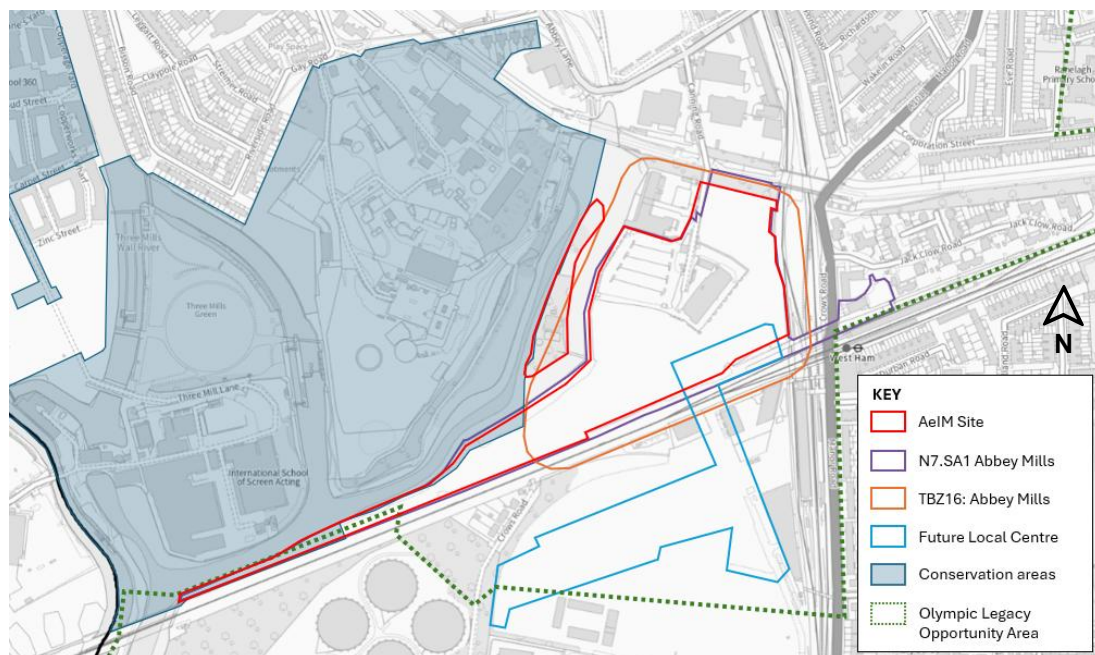


Figure 1: Map showing the boundary of TBZ16, N7.SA1 and AeIM's site ownership (source: Montagu Evans).

- 1.6 AeIM endorses the identification of TBZ16 as a Tall Building Zone ('TBZ') under Draft Plan Policy D4, and we agree that the inclusion of the Site in a TBZ is justified and sound. However, we strongly disagree with the arbitrary "height range maximum" of TBZ16 and consider it to be unjustified and unsound having regard to the evidence base, the Site's characteristics and surroundings, the National Planning Policy Framework (2023) ('NPPF'), and London Plan (2021) ('London Plan').
- 1.7 The height parameters for TBZ16 and the unsound ones proposed in N7.SA1 are summarised in **Figure 2**.

DOCUMENT	POLICY D4 - TBZ16 ABBEY MILLS		SITE ALLOCATION N7.SA1 - ABBEY MILLS
	HEIGHT RANGE MAXIMUM	FURTHER GUIDANCE	HEIGHT GUIDANCE
Regulation 18 Draft Plan	40m	- Prevailing heights between 21m and 32m - Opportunity to include tall building elements up to 40m.	6 to 12 storeys with building heights stepping down towards the west.
Regulation 19 Draft Plan	40m (ca. 13 storeys)	- Prevailing heights should be between 21m and 32m (ca. 7-10 storeys). - Opportunity to include tall building elements up to 40m (ca. 13 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, including the Abbey Mills Pumping Station. - Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid overshadowing impact on watercourses.	Building heights should be range between 9 - 21m (ca. 3-7 storeys) with taller buildings up to 40m (ca. 13 storeys) to aid wayfinding. Massing should step down towards the west of the site to sensitively integrate with the heritage assets.

Figure 2: Height parameters for TBZ16 and N7.SA1 at Regulation 18 and 19 stage (source: Montagu Evans).

- 1.8 AeIM's Masterplan, which is based on extensive site and context analysis, demonstrates that TBZ16 can not only accommodate significantly greater heights than allowed under emerging Policy D4, but such a design response is clearly desirable. The evidence base has no remotely comparable analysis, and the failure to test and consider alternatives conflicts with London Plan Policy D3. Major modifications are therefore required to ensure that emerging Policy D4 meets the terms of the NPPF.
- 1.9 Modifications are also required to the boundary of TBZ16 for the following reasons:
- 1.9.1 The proposed boundaries of TBZ16 and N7.SA1 are not aligned, with the latter extending beyond the boundary of TBZ16 (**Figure 1**). The supporting text of emerging Policy D4 states that development of tall buildings outside TBZs "*will be considered a departure from the plan*". Contradicting this, the entirety of N7.SA1, including land outside TBZ16, is identified as suitable for tall buildings. This is a fundamental inconsistency within the Draft Plan.
- 1.9.2 As drawn, the boundary of TBZ16 omits developable areas of the Site from the TBZ, meaning the Draft Plan does not allow for the land within N7.SA1 to be fully optimised.
- 1.10 Having reviewed the evidence base, our key findings and conclusions are that:
- 1.10.1 Throughout the evidence base the boundary of the Olympic Legacy Opportunity Area ('OLOA') is incorrectly drawn, resulting in TBZ16 (and N7.SA1) being incorrectly omitted from its boundary¹. This reveals that the location of TBZ16 within a regionally significant growth area has not been factored into the maximum height parameters in emerging Policy D4.

¹ Examination of the spatial analysis maps within the Newham Characterisation Study (2024) suggests that the boundary of the LLDC and the OLOA have been conflated when in fact the two are not the same. See for example, the Emerging Context Map in Chapter 3 of the Newham Characterisation Study (2024) (ref: EB010) (pg.21).

- 1.10.2 Between Regulation 18 and 19 stage the location of the Future Local Centre ('FLC') at West Ham Station has been amended in the evidence base to be entirely outside TBZ16, and the classification of TBZ16 has inexplicably changed from 'Tall Elements Within Large Masterplan Areas' to 'Tall Elements Within Constrained Masterplans'. Both occur with no justification.
- 1.10.3 Cumulatively, the practical effect of these errors and changes in the evidence base has been an unjustified and illogical reduction in the proper recognition of the strategic importance of TBZ16 (and N7.SA1) in the evidence base, and so too in the Draft Plan.
- 1.10.4 LBN's purported capacity testing within the evidence base has been extremely limited. In respect of N7.SA1, capacity testing was carried out at Regulation 18 stage but was not tested once the evidence underpinning the tall building approach of the Draft Plan was updated.
- 1.10.5 The Draft Plan now purports to set a lower 'prevailing height' maximum for N7.SA1 (9-21m or 3-7 storeys) than that identified for TBZ16 in the evidence base (above 21m and up to 32m), with no explanation to support the departure from the evidence base, nor the reduction of the 'prevailing height' maximum for N7.SA1 between Regulation 18 and 19 stages (see **Figure 2**). The 'prevailing height' maximum for N7.SA1 is therefore not justified or sound.
- 1.10.6 The proximity of TBZ16 (and N7.SA1) to nearby heritage assets has been used to restrict the maximum height parameters of the TBZ, but without any analysis of their capacity to accommodate change to their settings through proper impact assessment. There is therefore no clear rationale or coherent evidence to support the heights within TBZ16 being restricted in the manner proposed. This is especially the case considering nearby consented schemes have effected a significant change to the setting of those same assets already, which is not recognised.
- 1.10.7 LBN has failed to account for, or to address, recent consented tall buildings on adjacent allocated sites to the south in the maximum height parameters for TBZ16. These establish and set a greater emerging context height, and a significant change to the skyline, which not just enables, but logically requires AelM's site to accommodate greater height than allowed in emerging Policy D4, as greater height is now fully justified and required to address the Site's context.
- 1.11 Accordingly, and in line with London Plan Policy D3, flexibility should be introduced into emerging Policy D4 and any site allocations arising from it (here, N7.SA1) to allow for an optimised scheme to come forward without giving rise to policy conflict.

POLICY AND EVIDENCE BASE CONTEXT

- 1.12 TBZ16 is within the OLOA, which the London Plan identifies as having the potential for 39,000 new homes and 65,000 new jobs by 2041. London Plan Policy SD1 directs boroughs to clearly set out how they will encourage and deliver the growth potential of Opportunity Areas and establish their capacity for growth.
- 1.13 This imperative is reflected in Part 1 of the Tall Buildings Annexe (2024) ('TB Annexe')²:

"The three OAs include the majority of the site allocations and will be the main focus of the regeneration and growth in the borough" (our emphasis) (pg.52).

² Document ref: EB023

- 1.14 Newham's Local Plan (2018) ('the Adopted Plan') housing target seeks to deliver 43,000 homes between 2018 and 2033. This target has increased in the Draft Plan whereby Newham will seek to deliver over 50,000 homes across the new plan period once adopted.
- 1.15 LBN's Site Allocation and Housing Trajectory Methodology Note (2025)³ confirms that LBN is unable to demonstrate a 5-year housing land supply, with LBN accepting that they can only demonstrate a 2.22-year housing land supply, which is a dire undersupply. The document also states that LBN does not have sufficient identified housing capacity to meet their London Plan housing requirement, with a shortfall of 16,278 units being identified (para. 4.7.2). In reality, as clearly illustrated here, this is not because the borough lacks available sites to deliver homes. To the contrary, such sites do exist – including the Site itself – but the shortfall stems from delays in delivering allocated sites within the Adopted Plan (para. 4.7.2) and a dramatic under-assessment of such site capacities.
- 1.16 TBZ16 partially includes one of four 'Future Local Centres' ('FLC') designated under Draft Plan Policy HS1.⁴ Part 1 of the TB Annexe is clear that tall buildings could represent the right typology to optimise site capacity in local centres within Opportunity Areas and/or areas of high accessibility to public transport (pg.58).
- 1.17 In this context, TBZ16 clearly has a critical role to play in meeting LBN's housing need, and one recognised at a regional level through the London Plan's OLOA designation. It is therefore particularly important for the emerging policies to be drafted in a way that enables every opportunity to be taken to make efficient use of land for residential and mixed-use development within TBZ16, particularly as LBN is unable to demonstrate a 5-year housing land supply.
- 1.18 London Plan Policy D1 directs boroughs to use the findings of area assessments to meet borough-wide growth requirements, while Policy D3 requires boroughs to make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. This approach is reflected in Draft Plan Policy BFN1.
- 1.19 The London Plan approach to tall buildings in Policy D9 is broadly to:
- Seek Local Plan positive designation of areas appropriate for tall buildings;
 - Outline appropriate tall building heights identified on maps in the Local Plan;
 - Allow proposals where they pass the D9(C) criteria-based assessment (confirmed in the *Master Brewer* case⁵).
- 1.20 The supporting text to London Plan Policy D9 requires that in locations where tall buildings might be an appropriate form of development, the borough should "*determine the maximum height that could (our emphasis) be acceptable*" (para. 3.9.2).
- 1.21 In this context, it is important for policies to be based on a robust and sound evidence base, as design-led optimisation requires an evidence-based approach.

³ Document ref: EB058

⁴ This is confirmed by the Map of Town Centres Network supporting Policy HS1 of the Draft Plan (see pg.112) and the Map under Site Allocation N7.SA1 (see pg.454). Nevertheless, N7.SA1 is omitted from the list of locations for FLCs in the text of Policy HS1 Part 1(e) itself.

⁵ *R (London Borough of Hillingdon) v Mayor of London* [2021] EWHC 3387 (Admin).

ROBUSTNESS OF THE EVIDENCE BASE

DEFINING TALL BUILDING ZONES

- 1.22 In the 2022 Newham Characterisation Study⁶ ('NCS'), TBZ16 was originally included in the list of TBZs identified for 'Tall Elements Within Large Masterplan Areas'. These are defined as "*Large masterplan zones that have the opportunity to set their own character and have a high capacity to grow...The height suggested for these elements reflects the scale and significance of areas like Stratford Central and Canning Town. These sites can negotiate adequate transitions to sensitive contexts along the edges highlighted on the map (our emphasis)*".
- 1.23 Despite this assessment, in the 2024 NCS⁷, TBZ16 has been omitted from the list of TBZs identified for 'Tall Elements Within Large Masterplan Areas' and is instead included in list of TBZs for 'Tall Elements Within Constrained Masterplans'⁸. This amendment is not explained and is at odds with the fact that the former group has been expanded to include 'West Ham Station' as an area of 'scale and significance' (pg.167), of which the land within TBZ16 forms a part.
- 1.24 Finally, comparison of the two documents shows that in the 2024 NCS, the spatial analysis maps have been amended throughout to show the FLC as being outside the boundary of TBZ16 and N7.SA1, again without explanation or justification⁹.
- 1.25 The practical effect of these unexplained amendments is a significant reduction in recognition of the strategic importance of TBZ16 (and so N7.SA1) in the updated evidence base, without any impact testing to support these amendments.

DEFINING TBZ MAXIMUM HEIGHT PARAMETERS

- 1.26 In the Tall Buildings Topic Paper (2025)¹⁰ ('TB Topic Paper'), LBN contends that the maximum height parameters set out in D4 have taken into account the heights of buildings that have 'been granted permission and...are under construction with substantial progress' (pg.29).
- 1.27 Bizarrely, LBN excludes consented schemes which have not commenced on the basis that:
- they are not considered 'fixed parameters'; and
 - planning applications assessed under the adopted Development Plan (or older plans) 'do not necessarily reflect Newham's aspirations' (TB Topic Paper, pg.29)
- 1.28 The latter statement is an unevidenced assertion and very surprising because Newham granted consent for those buildings. It is inexplicable as to how such 'aspiration' is defined or expressed if not through the grant of consents.
- 1.29 The former statement is, more fundamentally, clearly at odds with guidance supporting London Plan Policy D9. This states that in "*large areas of extensive change, such as Opportunity Areas, the threshold for what*

⁶ Not included in Evidence Base Library, though we have requested in be included.

⁷ See pages 167 and 168 of EB015.

⁸ These are defined in the 2022 NCS as sites that have a high capacity for growth but that are affected by external edge conditions. In the 2024 NCS the list of external edge conditions has been updated to include 'the proximity to sensitive and/or low-rise context'.

⁹ See for example the location of the FLC in the Tall Building Zones Map on page 166 of the 2024 NCS (ref: EB015) compared to its location on the same Map in the 2022 NCS.

¹⁰ Document ref: TP001.

constitutes a tall building should relate to the evolving (not just the existing) context (our emphasis)" (para 3.9.3).

- 1.30 LBN's decision to disregard consented tall buildings is illogical, conflicts with the London Plan requirement to optimise sites, and undermines the methodology which has purported to set the maximum height parameters set out in Draft Plan Policy D4.

HEIGHT PARAMETERS AND SITE CAPACITY WITHIN TBZ16

- 1.31 In addition to the analysis provided above, for the following reasons, we conclude that the maximum height parameters for TBZ16 and N7.SA1 are not justified in any event:
- 1.31.1 The boundary of the OLOA is incorrectly drawn on the spatial analysis maps throughout the evidence base, resulting in TBZ16 being excluded from the OLOA. The only acknowledgement that TBZ16 is within the OLOA occurs in the text on page 64 of the TB Annexe (produced after Regulation 18 consultation), though this results in no changes to the maximum height parameters at Regulation 19 stage, once the location of TBZ16 in the OLOA was identified.
 - 1.31.2 Neither the OLOA, nor FLC designations appear to have been factored into the site capacity testing for N7.SA1 at Regulation 18 stage.¹¹ This is a serious flaw in the evidence base and contrary to London Plan guidance.
 - 1.31.3 The maximum height parameters set out in Draft Plan Policy D4, and the resulting site allocations, are expressed as 'maximum heights' and 'prevailing heights'. Across the evidence base TBZ16 is identified as being able to accommodate a prevailing height above 21m and up to 32m (7-10 storeys). At Regulation 18 Stage this resulted in a maximum parameter height of '6-12 storeys' for N7.SA1¹². Departing from this, the current draft site allocation for N7.SA1 sets a 'prevailing height maximum of 'between 9-21m (3-7 storeys)''. No justification has been provided for why the 'prevailing height' maximum set out in the Draft Plan is contrary to the findings of the evidence base, or why the heights were reduced between Regulation 18 and 19 stage.
 - 1.31.4 Following the inclusion of selective consented tall buildings into the analysis of the evidence base, the location of buildings of up to 100m+ in height on the site adjacent to TBZ16 illogically did not result in an increase in the maximum height parameters for TBZ16, nor any further site capacity testing for N7.SA1 after Regulation 18 stage.¹³ This failure to take the direction of change in the townscape into account is another serious flaw of the evidence base.
 - 1.31.5 Between Regulation 18 and 19 stages, the tall buildings approach to TBZ16 and N7.SA1 was purportedly amended to account for the sensitivity of nearby heritage assets. Whilst such designations obviously need to be considered, there was clearly no testing to ascertain at what height development on the site might challenge, undermine or harm the setting of these assets, bearing in mind that recent consents have set a new skyline within their settings¹⁴.

¹¹ As confirmed by pages 2 and 3 of Topic Paper: Site Capacity Study Summary Part 1 (ref: EB003a).

¹² The approach of defining 'maximum heights' and 'prevailing heights' of the Draft Plan was not taken to the wording of the site allocation at Regulation 18 stage.

¹³ As confirmed by pages 2 and 3 of Topic Paper: Site Capacity Study Summary Part 1 (ref: EB003a).

¹⁴ In the TB Topic Paper (ref: TP001), LBN states that they tested site capacities through 3D modelling in VU.CITY to test the appropriateness of the proposal in its context. Notwithstanding the fact that this testing is not included in the evidence base and so cannot be scrutinised, Document EB003a confirms that the site capacity of N7.SA1 was not tested after Regulation 18 stage.

- 1.32 The consented schemes at the Twelvetrees and Bromley-by-Bow Gasholders sites establish a height datum in views of/within the setting of the identified heritage assets. It is our clear and professional judgement that AeIM's own capacity study demonstrates that AeIM's land within TBZ16 can and should be developed within that skyline silhouette using appropriately tall buildings, and these will not have any additional skyline, townscape or setting impacts. Whatever the particular reasons for granting those consents, their scale now establishes an existing consent and opportunity to intensify the use of TBZ16 (and N7.SA1) which the maximum height parameters within emerging Policy D4 should recognise.
- 1.33 LBN's decision to disregard those two consents is illogical, conflicts with the London Plan requirement to optimise sites, and undermines the methodology which has purported to set the maximum height parameters set out in Policy D4 of the Draft Plan.
- 1.34 On this basis, we conclude the evidence base is not sound and not robust to justify the imposition of the maximum height parameters in Policy D4 of the Draft Plan.

REQUIRED MODIFICATIONS

- 1.35 In summary, the maximum height parameters for TBZ16 as set out in Policy D4 of the Draft Plan are not justified and are unsound, because of the fundamental issues demonstrated with the approach to defining the maximum height parameters for TBZ16 and the site allocations which lead from it (N7.SA1).
- 1.36 Furthermore, we suggest that emerging Policy D4 is also unsound as drafted because:
- 1.36.1 The requirement to 'conserve and enhance' the character of heritage assets under TBZ16 is more stringent than both the statutory test¹⁵ and the NPPF, and is out of step with the balancing provisions of London Plan Policy D9(C).
- 1.36.2 The 'landmarks and key views' referenced under TBZ16 have not been defined within the policy or the evidence base and so this part of the policy cannot be implemented or applied.
- 1.36.3 The requirement to avoid overshadowing impacts on watercourses under TBZ16 is too stringent and would prejudice development of N7.SA1 as, by its nature, development would introduce shadows at certain points of the day.
- 1.37 We therefore seek modifications to Draft Plan Policy D4 to provide flexibility to allow acceptable heights of tall buildings to be determined through the design-led approach. We also seek an amendment to the boundary of TBZ16 as shown on the Map on Page 79 of the Draft Plan to allow the developable land within it to be optimised. The required modifications are set out in **Appendix 2**.
- 1.38 These modifications are crucial to ensuring that Policy D4 does not constrain development across the borough or within TBZ16, and are consistent with the approach taken to other local plans which have been examined and adopted in line with the London Plan.¹⁶

¹⁵ Section 66(1) of Planning (Listed Building and Conservation Areas Act) 1990

¹⁶ See LB Southwark's Local Plan, adopted February 2022 and RBKC's Local Plan, adopted July 2024.

APPENDIX 1.0

AeIM MASTERPLAN

Hearing Statement Appendices

Hearing Statement prepared on behalf of the
Anjuman-e-Islahul-Muslimeen

London Borough of Newham Local Plan Submission Stage (Regulation 22)

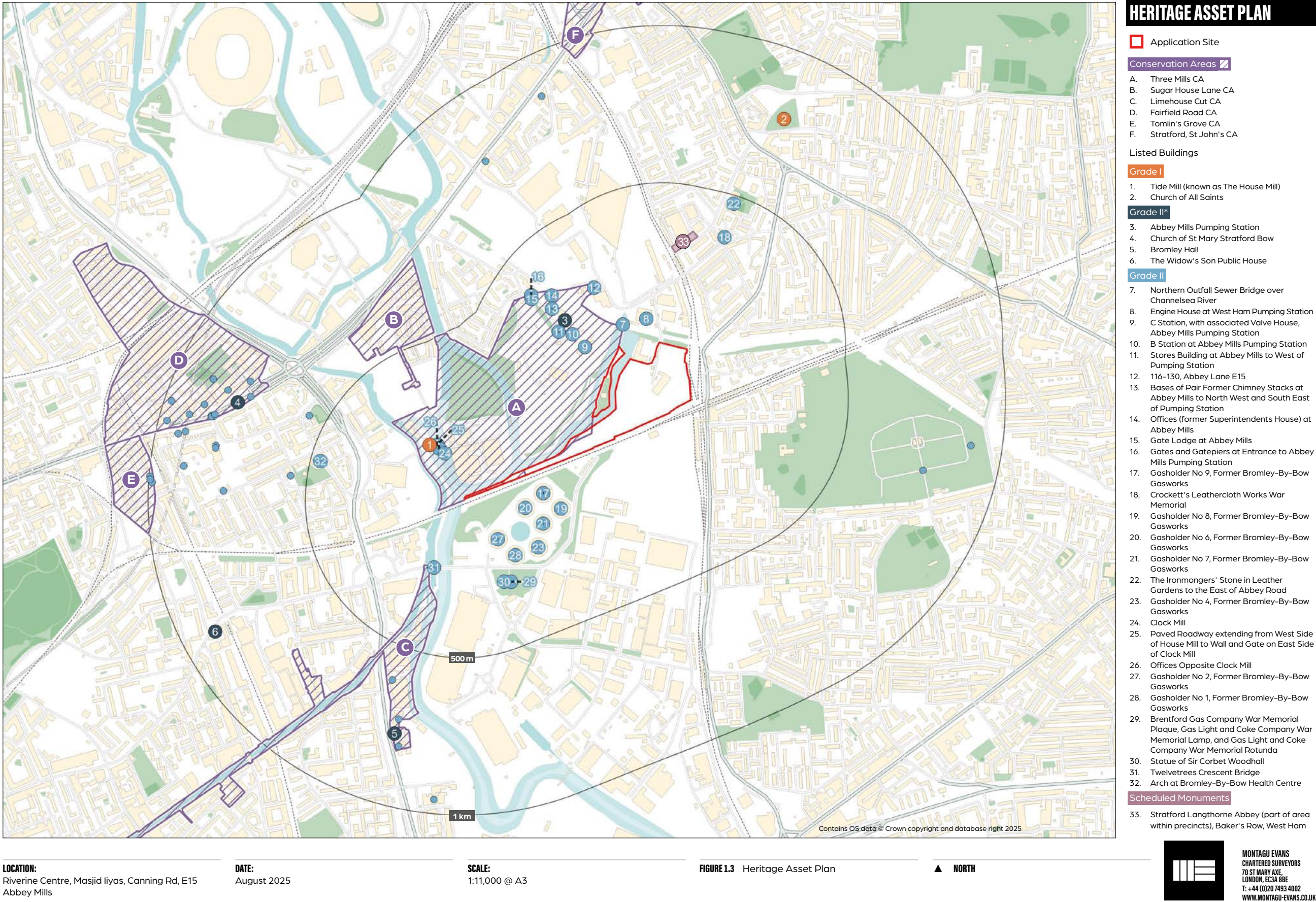
Appendix 01

Site Location Aerial



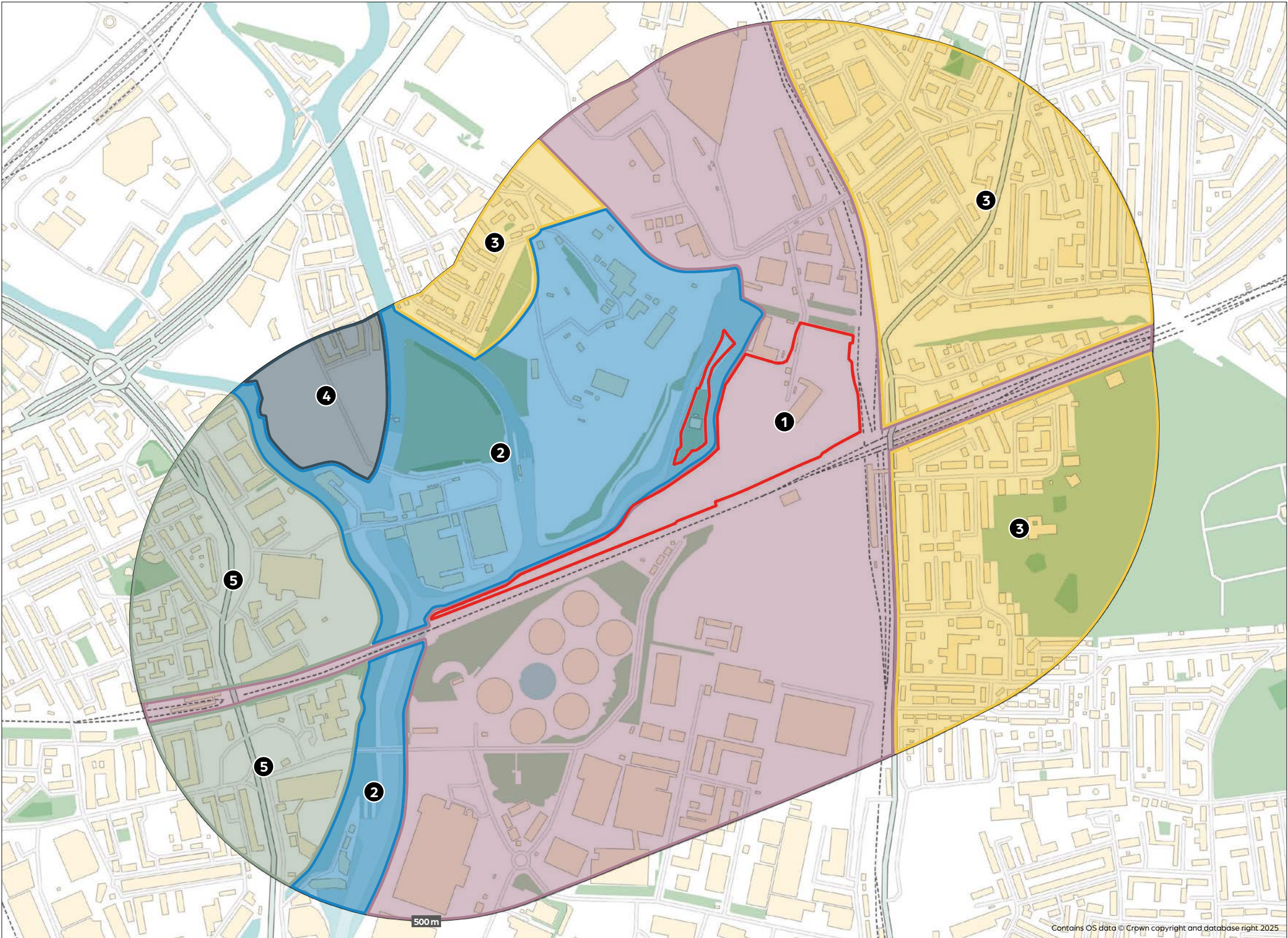
Appendix 02

Heritage Asset Plan



Appendix 03

Townscape Character Plan



TOWNSCAPE
CHARACTER AREA PLAN

- Application Site
- TCA 1:
Industrial and rail network
- TCA 2:
Riverine network: waterways,
mills and pumping stations
- TCA 3:
20th Century residential
- TCA 4:
Sugar House Island
- TCA 5:
Bromley-by-Bow

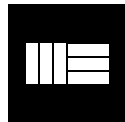
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Riverine Centre, Masjid Iyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
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FIGURE 2.1 Townscape Character Area Plan

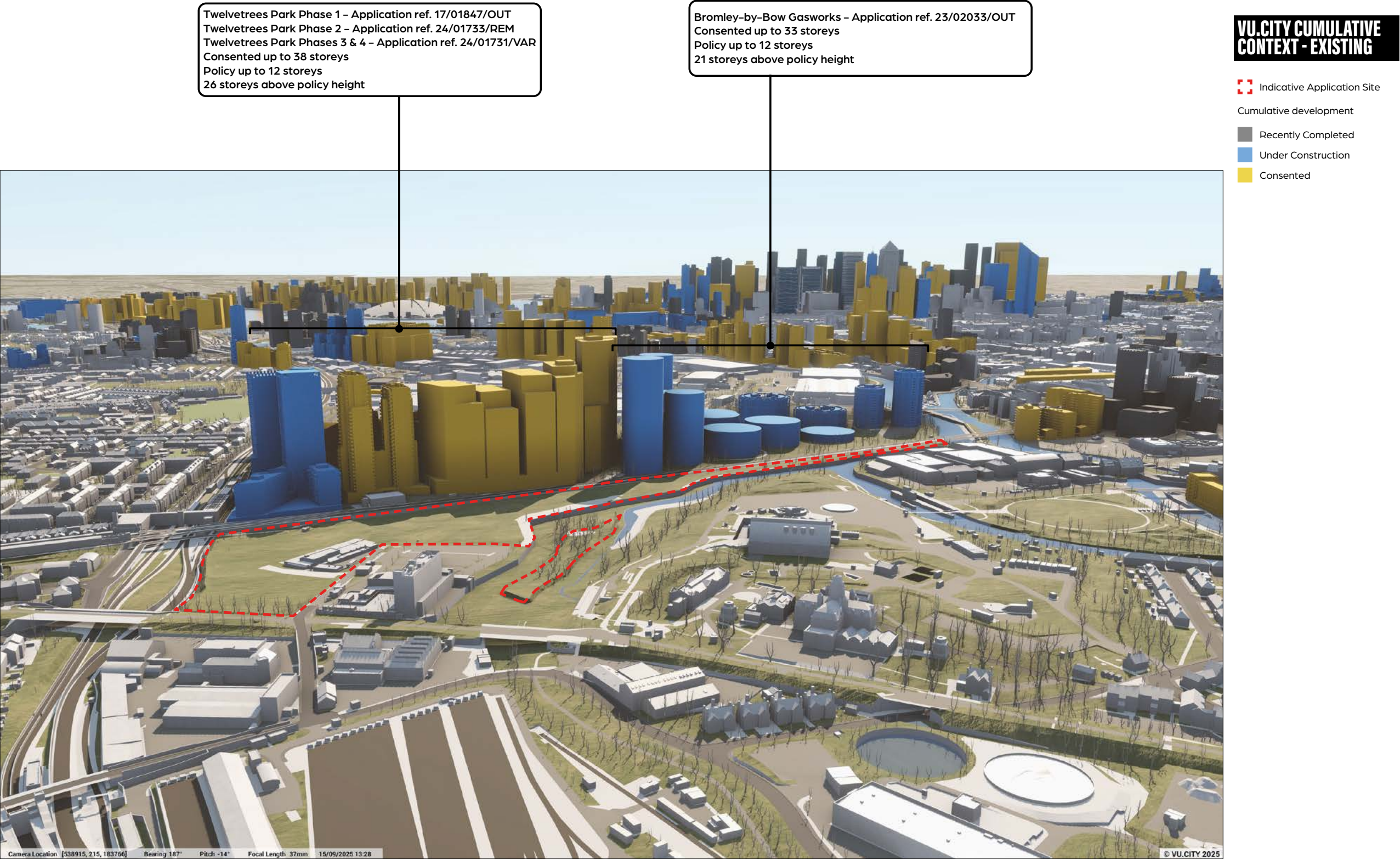
▲ NORTH



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Appendix 04

Vu.City Cumulative Context - Existing Oblique Aerial



LOCATION:
Riverine Centre, Masjid Ilyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

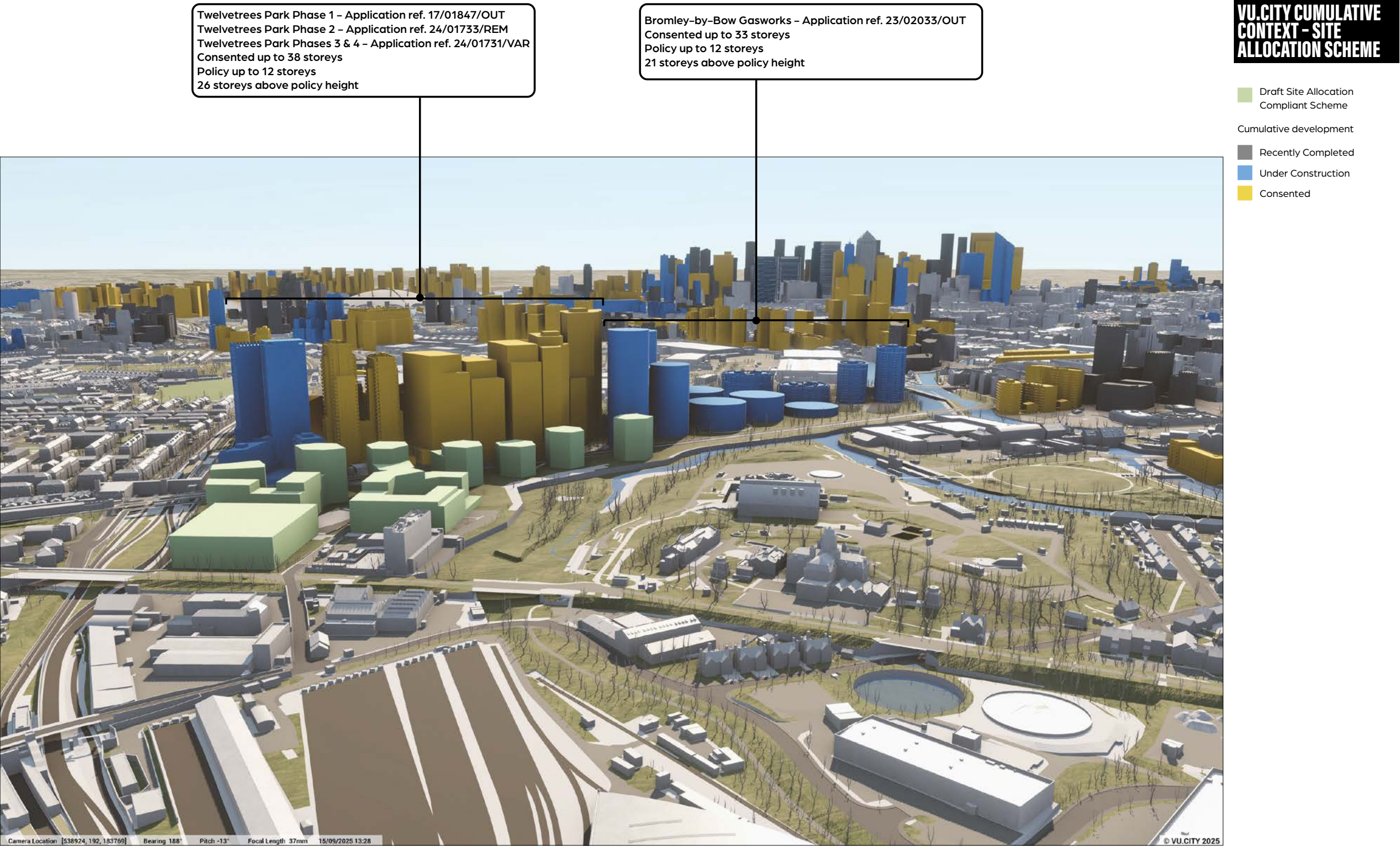
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NOT TO SCALE

FIGURE 3.1 Southerly VU.CITY oblique aerial view of established and emerging tall building context. Blue = under construction; yellow = consented; black = completed

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Appendix 05

Vu.City Cumulative Context - Site Allocation Scheme Oblique Aerial

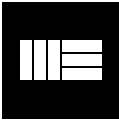


LOCATION:
Riverine Centre, Masjid Iiyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

SCALE:
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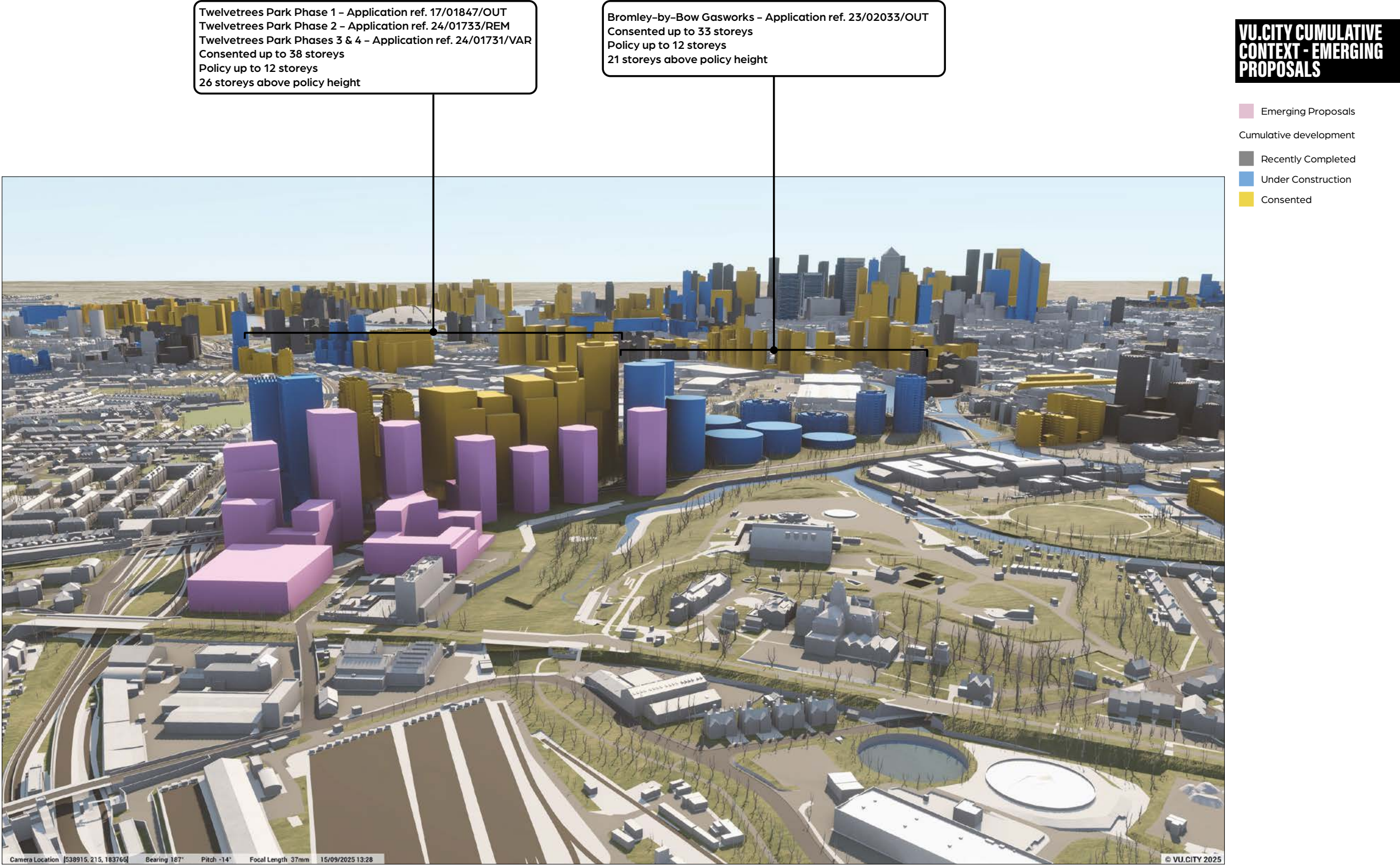
FIGURE 4.4 Southerly VU.CITY oblique aerial view of established and emerging tall building context, including a draft site allocation compliant scheme massing in green. Blue = under construction; yellow = consented; black = completed



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Appendix 06

Vu.City Cumulative Context - Emerging Proposals Iteration 01 Oblique Aerial



LOCATION:
Rivierine Centre, Masjid Iiyas, Canning Rd, E15
Abbey Mills

DATE:
October 2025

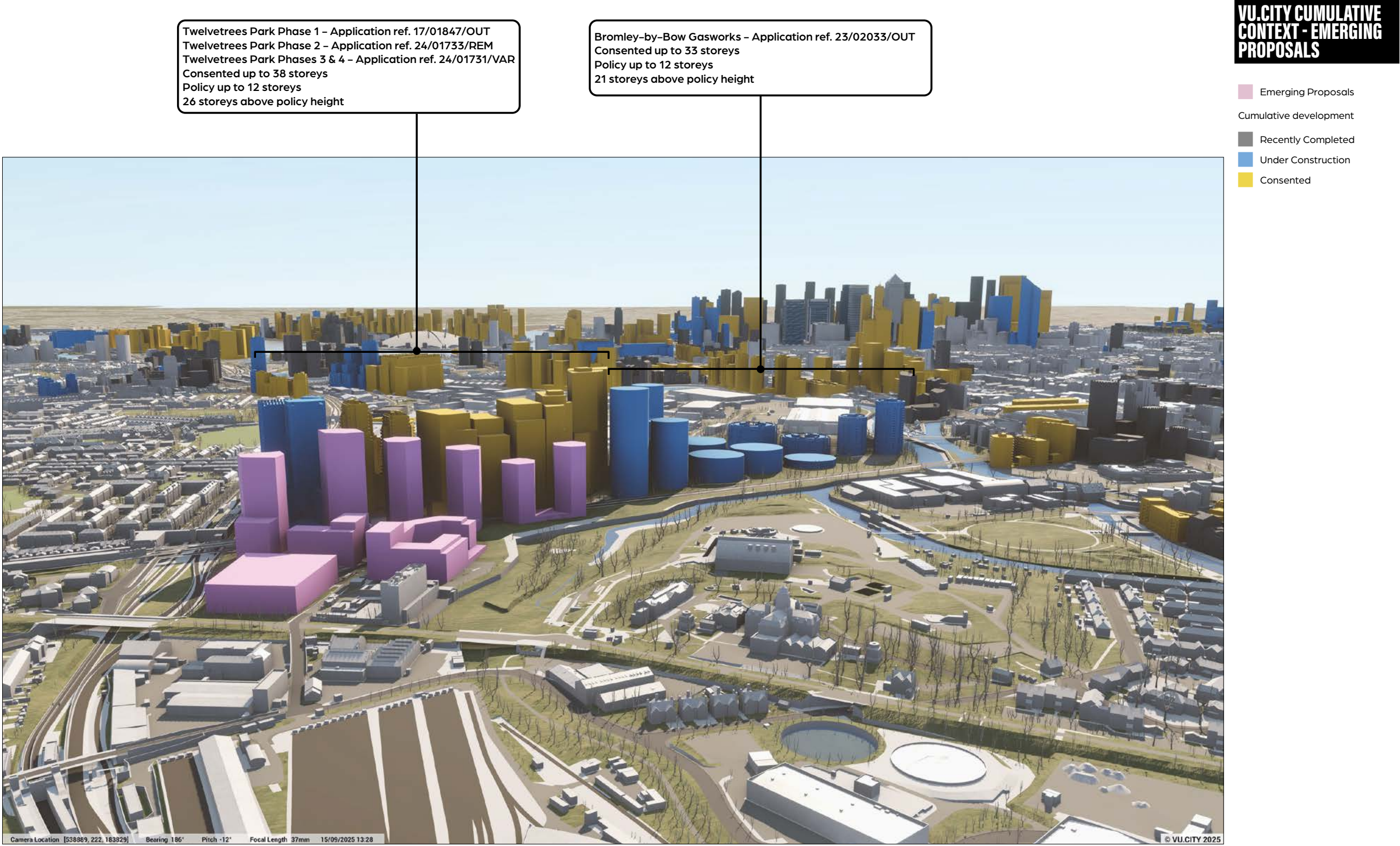
SCALE:
NOT TO SCALE

FIGURE 5.2 Southerly VU.CITY oblique aerial view of established and emerging tall building context, including the emerging proposals in mauve.
Blue = under construction; yellow = consented; black = completed

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Appendix 07

Vu.City Cumulative Context - Emerging Proposals Iteration 02 Oblique Aerial



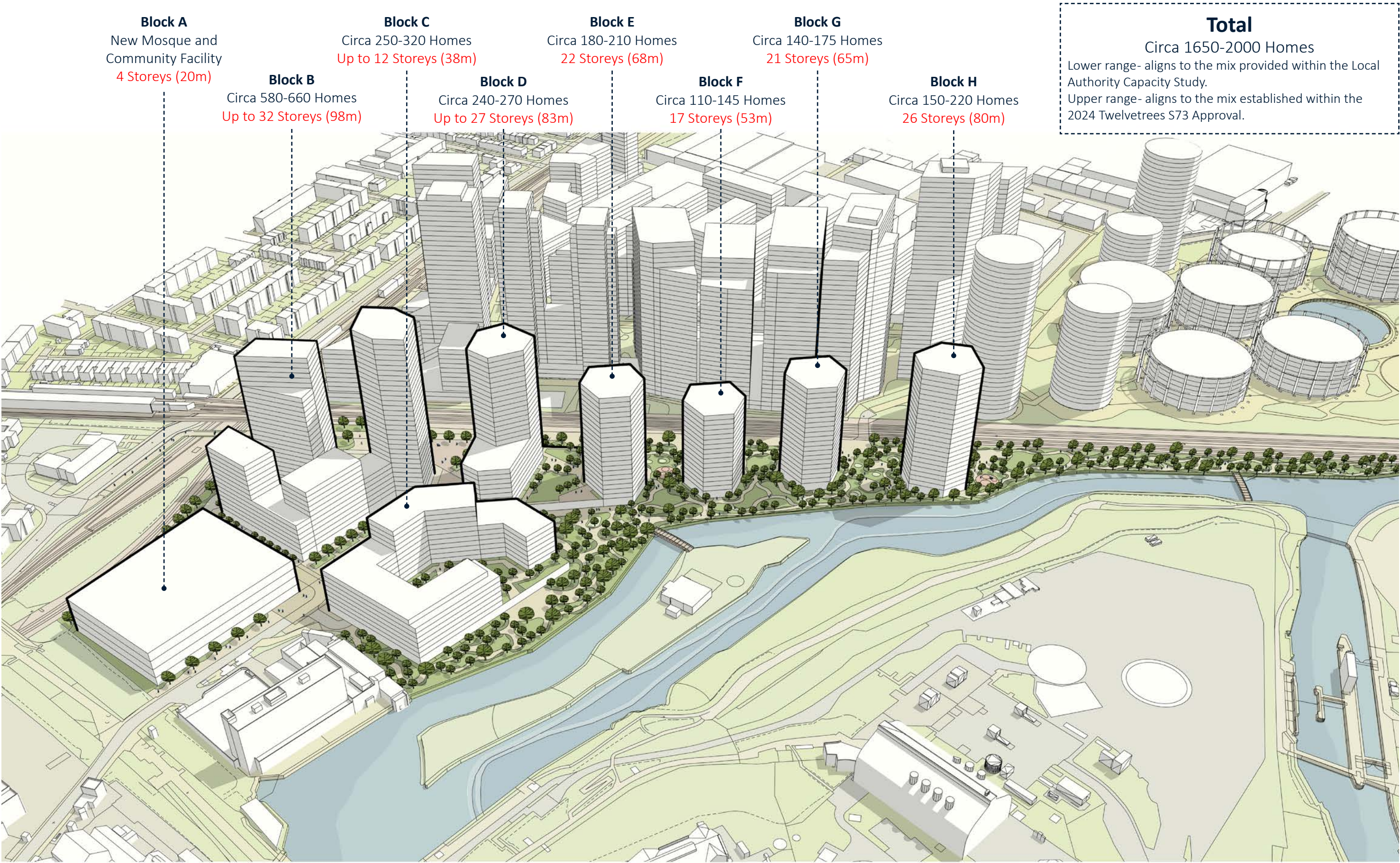
Appendix 08

Emerging Proposals Iteration 01 Illustrative Masterplan



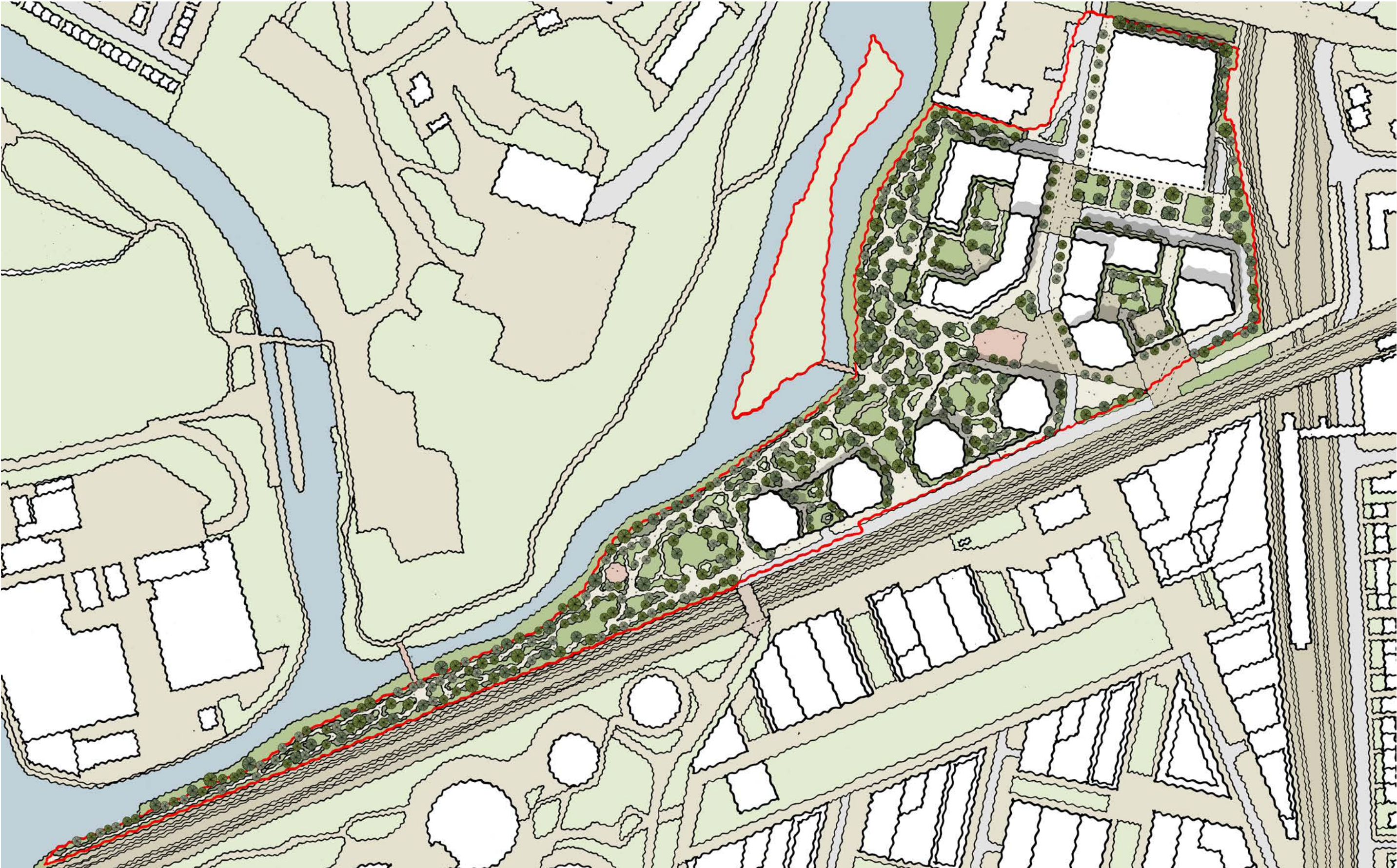
Appendix 09

Emerging Proposals Iteration 01 Illustrative Axonometric



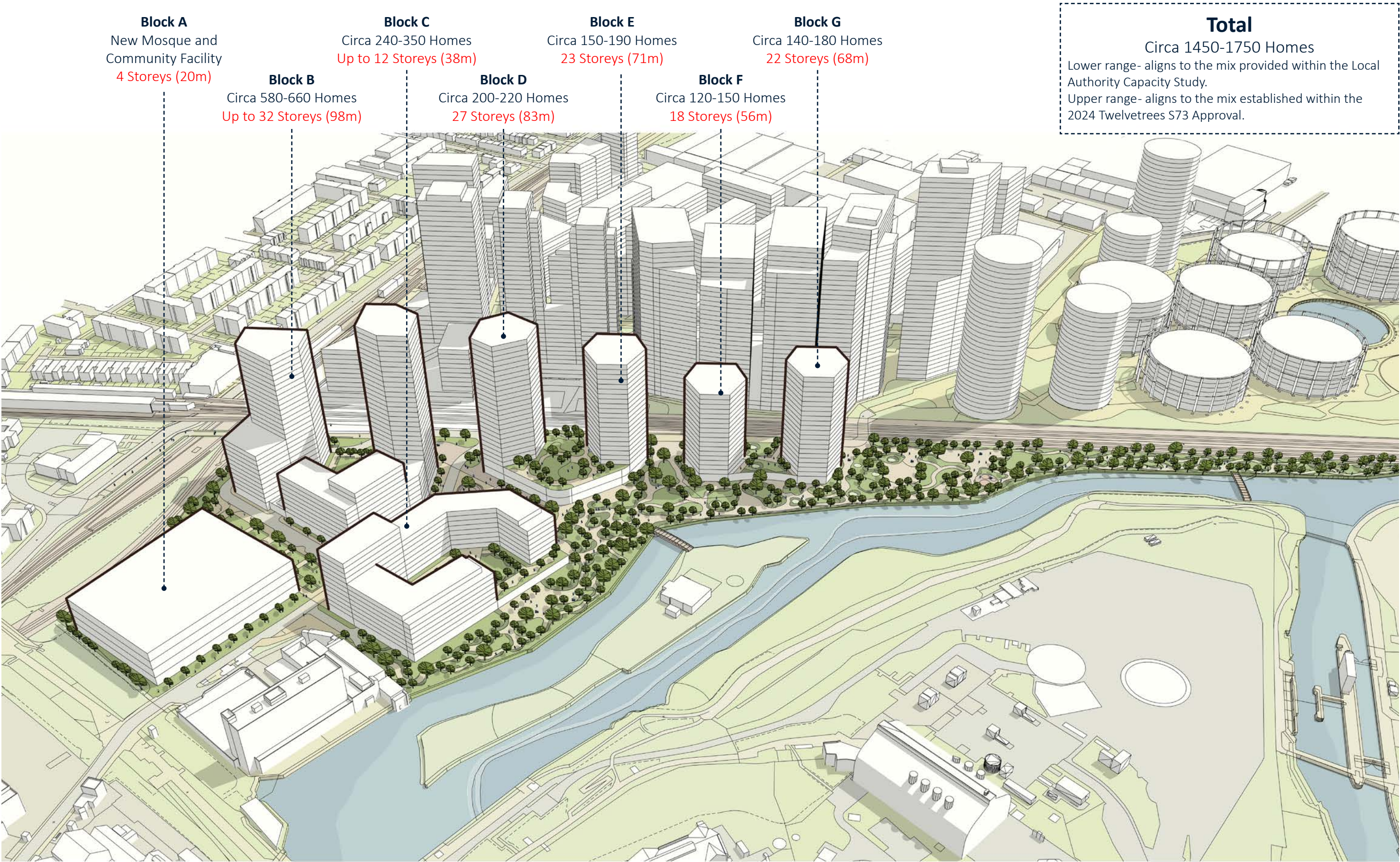
Appendix 10

Emerging Proposals Iteration 02 Illustrative Axonometric



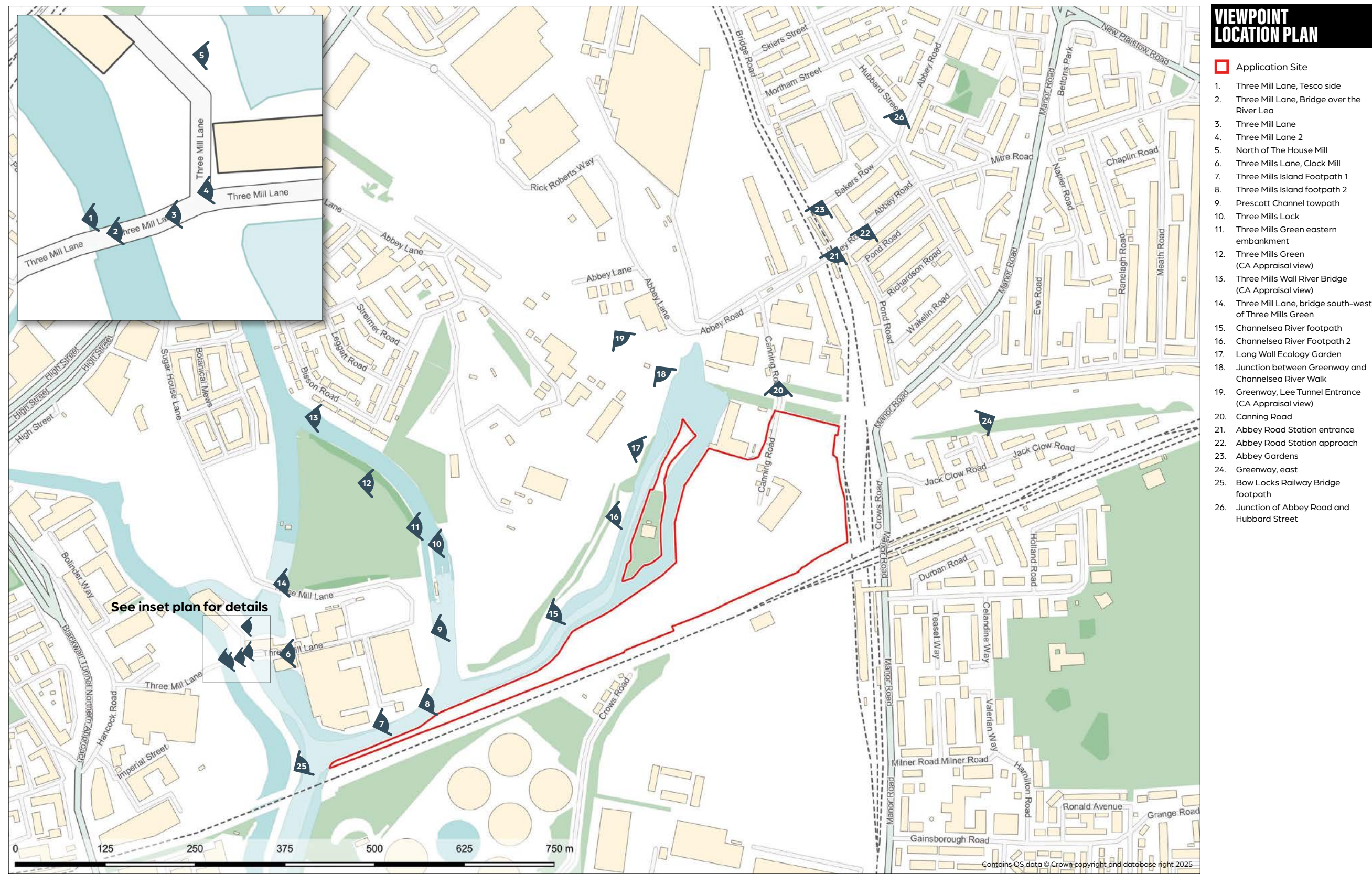
Appendix 11

Emerging Proposals Iteration 02 Illustrative Axonometric



Appendix 12

Viewpoint Location Plan



LOCATION:
Riverine Centre, Masjid Iiyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
1:5,000 @ A3

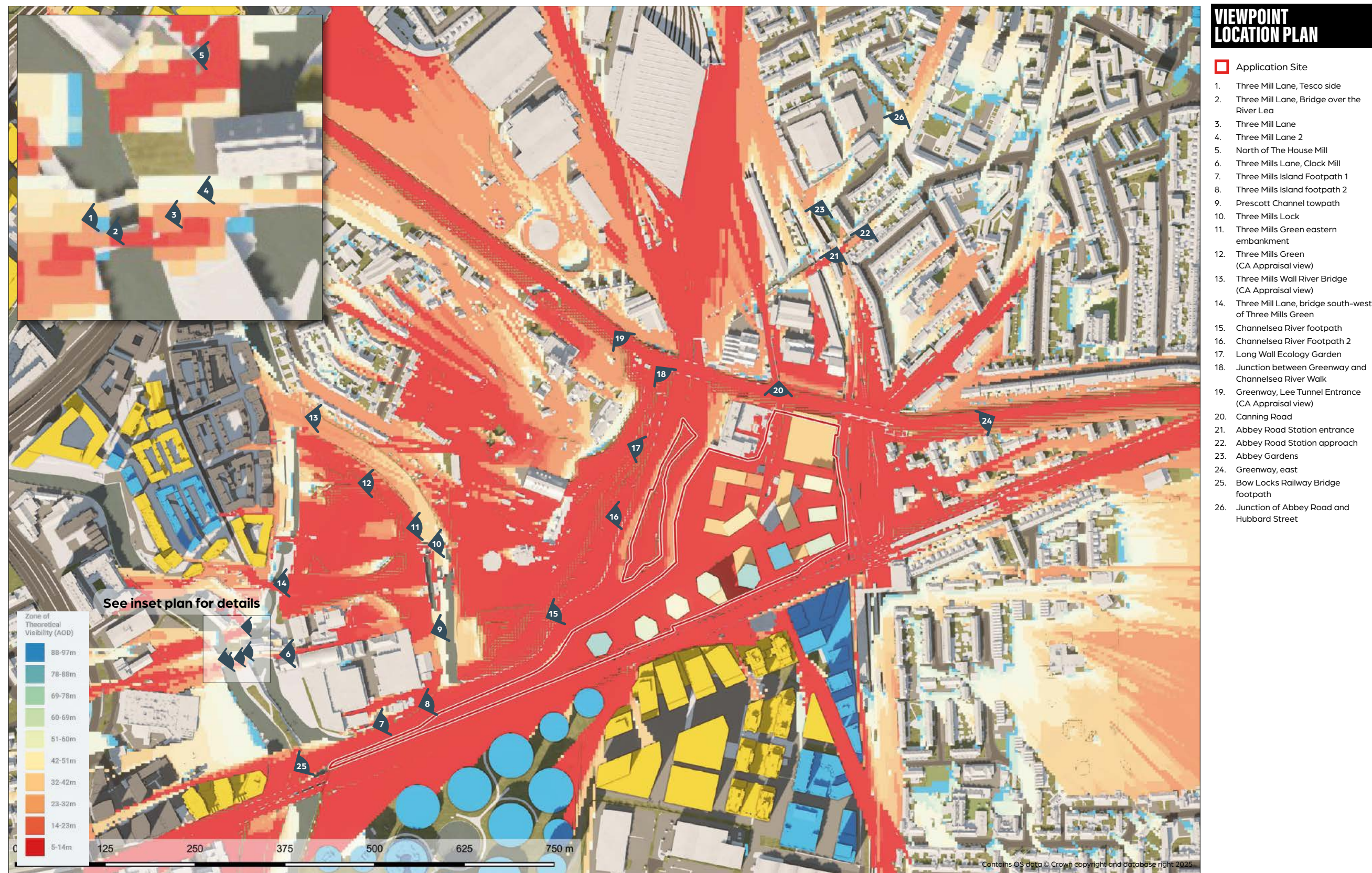
FIGURE 5.3 View Location Plan

▲ NORTH

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Appendix 13

Viewpoint Location Plan with ZTV Overlay



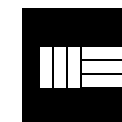
LOCATION:
Riverine Centre, Masjid Iyas, Canning Rd, E15
Abbey Mills

DATE:
August 2025

SCALE:
1:5,000 @ A3

FIGURE 5.4 View Location Plan with ZTV overlay

▲ NORTH



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Appendix 14

View 3 - Three Mill Lane



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 15

View 9 - Prescott Channel towpath



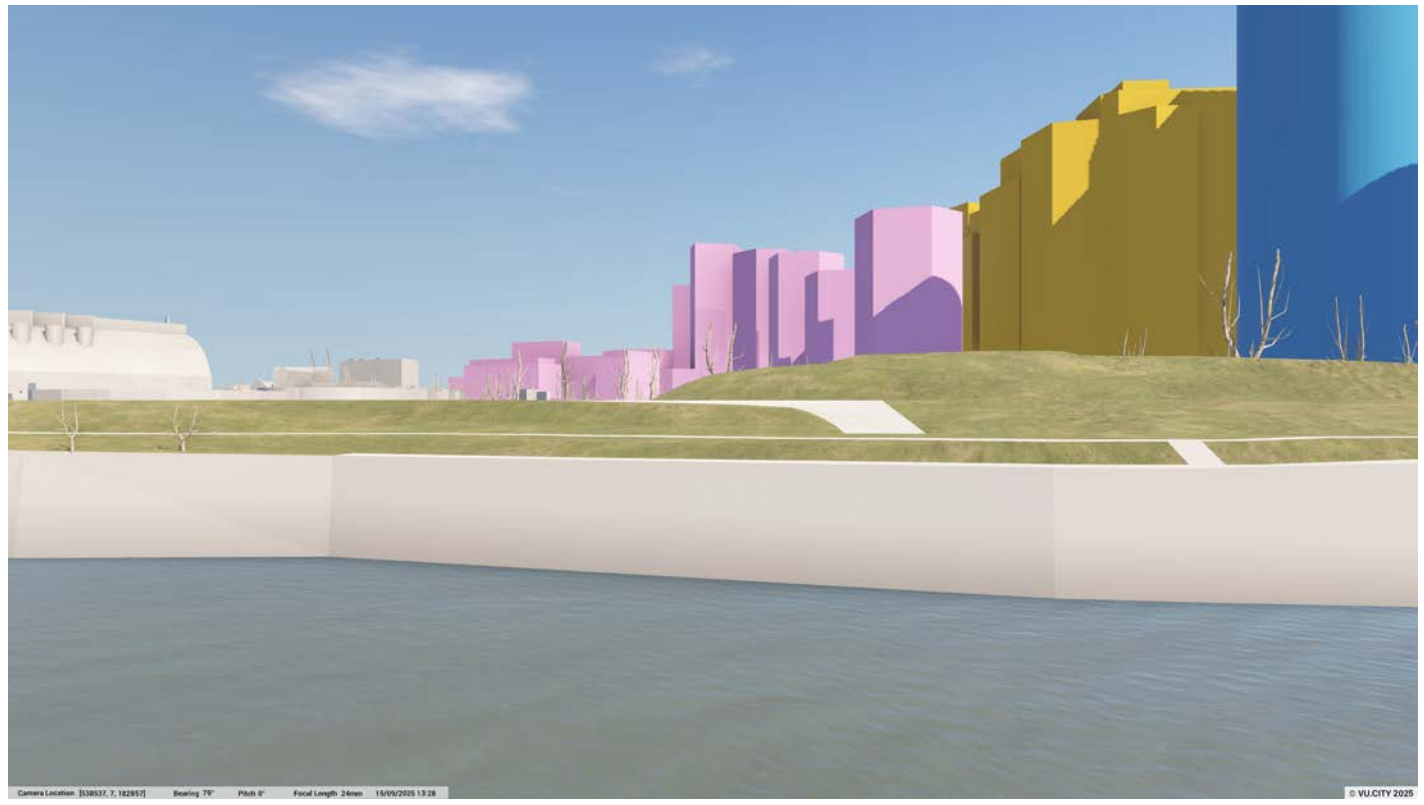
CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 16

View 11 - Three Mills Green eastern embankment



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



EXISTING PHOTOGRAPHY



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 17

View 13 - Three Mills Wall River Bridge (CA Appraisal view)



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 18

View 19 - Greenway, Lee Tunnel Entrance (CA Appraisal view)



CUMULATIVE BASELINE



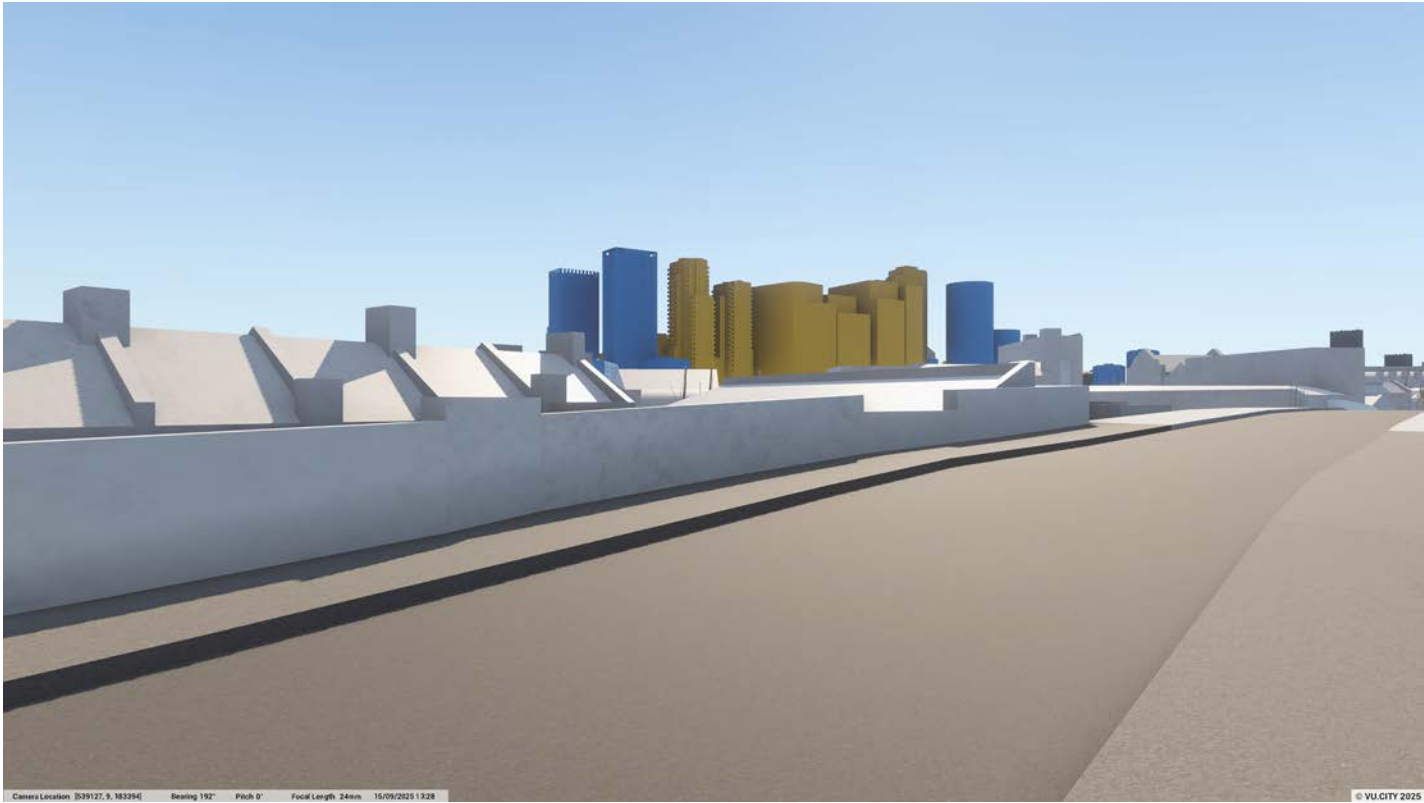
CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



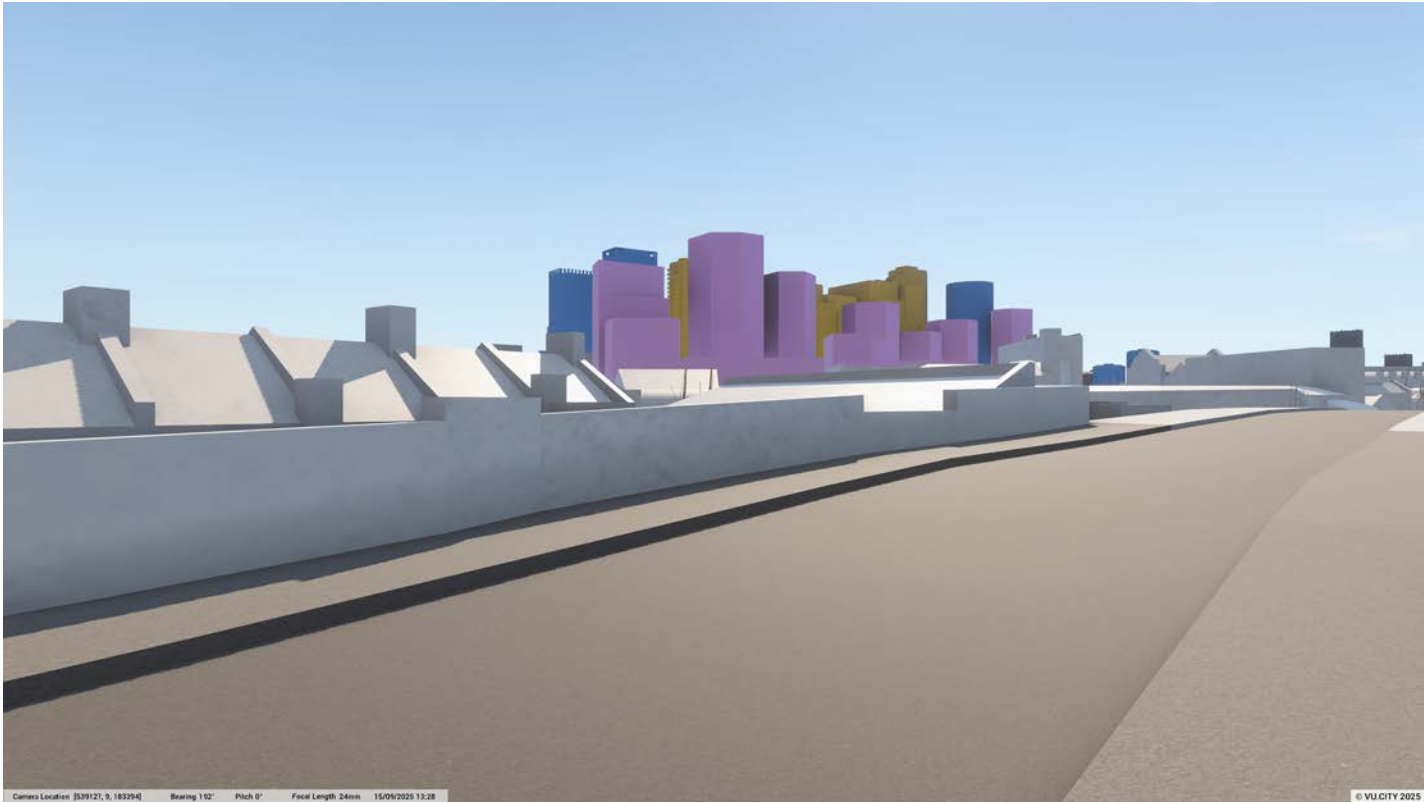
CUMULATIVE + PROPOSED Emerging Proposals Iteration 02

Appendix 19

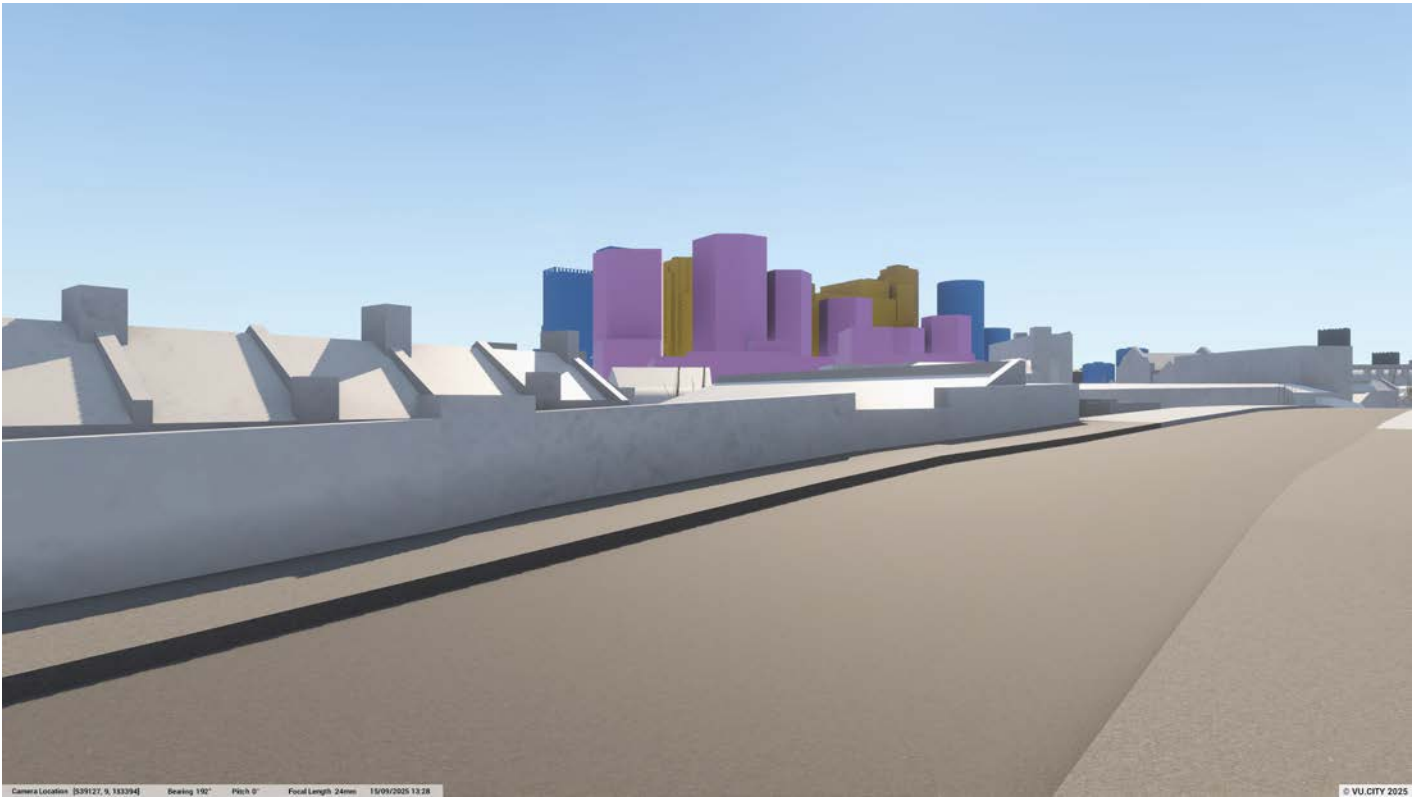
View 22 - Abbey Road Station approach



CUMULATIVE BASELINE



CUMULATIVE + PROPOSED Emerging Proposals Iteration 01



CUMULATIVE + PROPOSED Emerging Proposals Iteration 02



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APPENDIX 2.0

REQUIRED MODIFICATIONS

REQUIRED MODIFICATIONS TO POLICY D4

Policy D4 should be amended as suggested below, where red text = addition, and red text + strikethrough = deletion.

D4: Tall buildings

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, **unless justified by a design-led approach to site optimisation**.

Table 1: Tall Building Zones

Tall Building Zone			Appropriate height range maximum	Further guidance
Tall Building Zone	Neighbourhood	Site Allocation(s)		
TBZ16: Abbey Mills	N7 Three Mills	N7.SA1 Abbey Mills	40m (ca. 13 storeys) or greater, subject to criteria testing.	Prevailing heights should be no less than between 21m and 32m (ca. 7-10 storeys) and subject to criteria testing. Opportunity to include tall building elements up to of at least 40m (ca. 13 storeys), or greater, subject to criteria testing. Height, scale and massing of development proposals should take account of, and seek to avoid harm to, heritage assets 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, and key views identified in relevant adopted conservation area appraisals. Careful consideration is required for the location of tall buildings, particularly along the waterways to avoid harmful overshadowing impact on watercourses.

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, **where appropriate**; 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.
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, **where appropriate**; and
 - b. the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street, **where appropriate**; 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, **where appropriate**.

PROPOSED MODIFICATION TO BOUNDARY OF TBZ16

AeIM's masterplan demonstrates that tall buildings can be accommodated on the part of the Site which falls outside of the western boundary of TBZ16 without adverse heritage or townscape impacts, and while delivering the 2ha local park as required by the allocation (see **Appendix 1**). On this basis, the boundary of TBZ16 should be amended to include the area to the west of the existing TBZ16 boundary.

The Map of Newham's Tall Building Zones on page 79 of the Draft Plan should be amended to reflect the below change to the boundary of TBZ16:

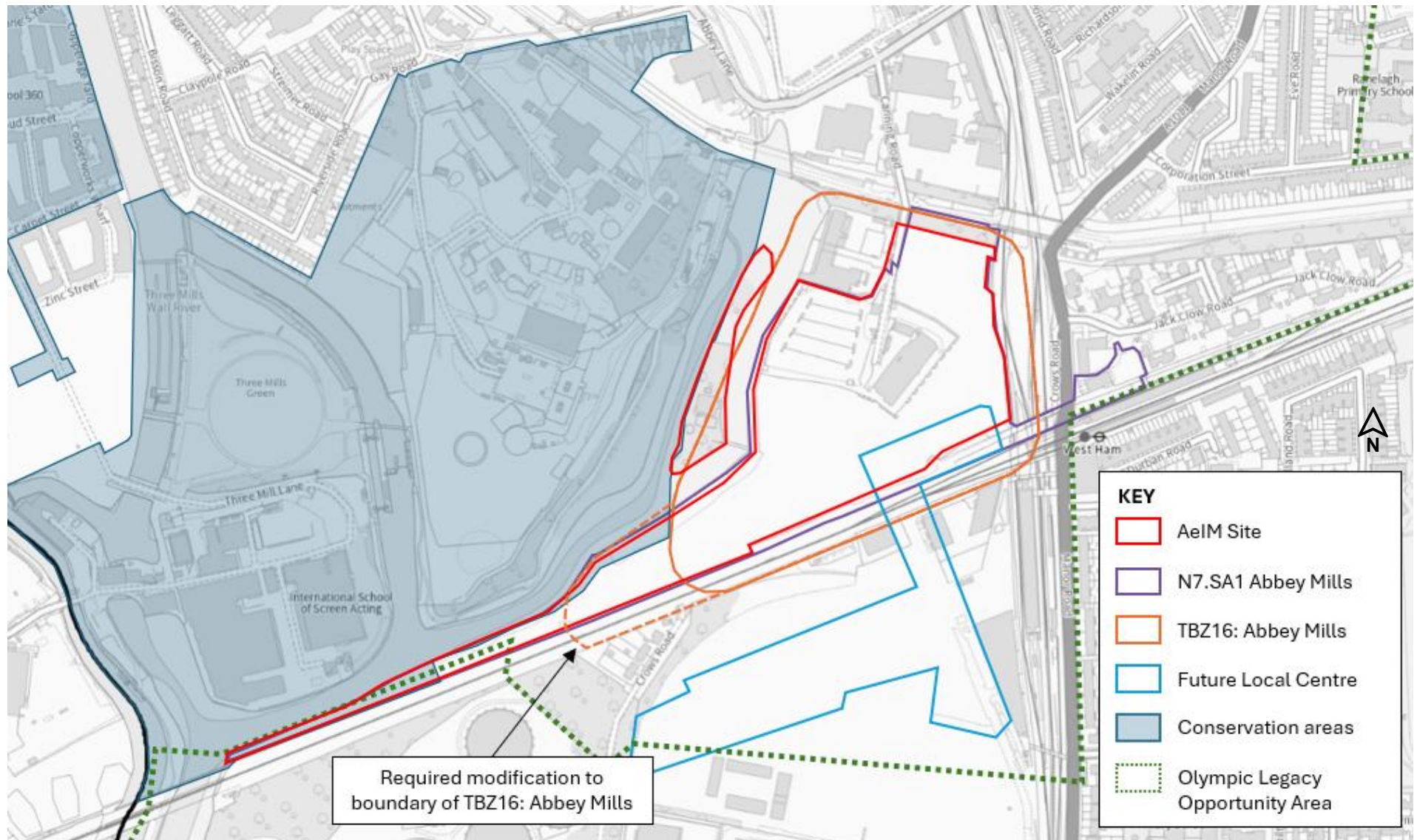


Figure A1: Map of TBZ16 with required boundary change annotated by dashed orange line (source: Montagu Evans).