

# **Examination of the Newham Local Plan - Hearing Session**

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## **Hearing Statement – Matter 3 (3rd December 2025)**

Prepared on behalf of the Forward Group Trustees (FGT) and  
THESET Ltd



## Matter 3 – Spatial Strategy

Forward Group Trustees (FGT) and THESET Ltd set out below their responses to the questions raised by the Inspector. The responses are set out in the order they appear in the Inspectors' MIQs. The Inspectors should assume that no comment is made by RCLCH in respect of the questions that have are not included below.

### Tall Buildings Zone (D4)

Question 3.2:

*Are the Tall Building Zones listed in policy D4 Table 1 and designated on the policies map, and the "height range maximum" for each, justified and will they be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?*

Response:

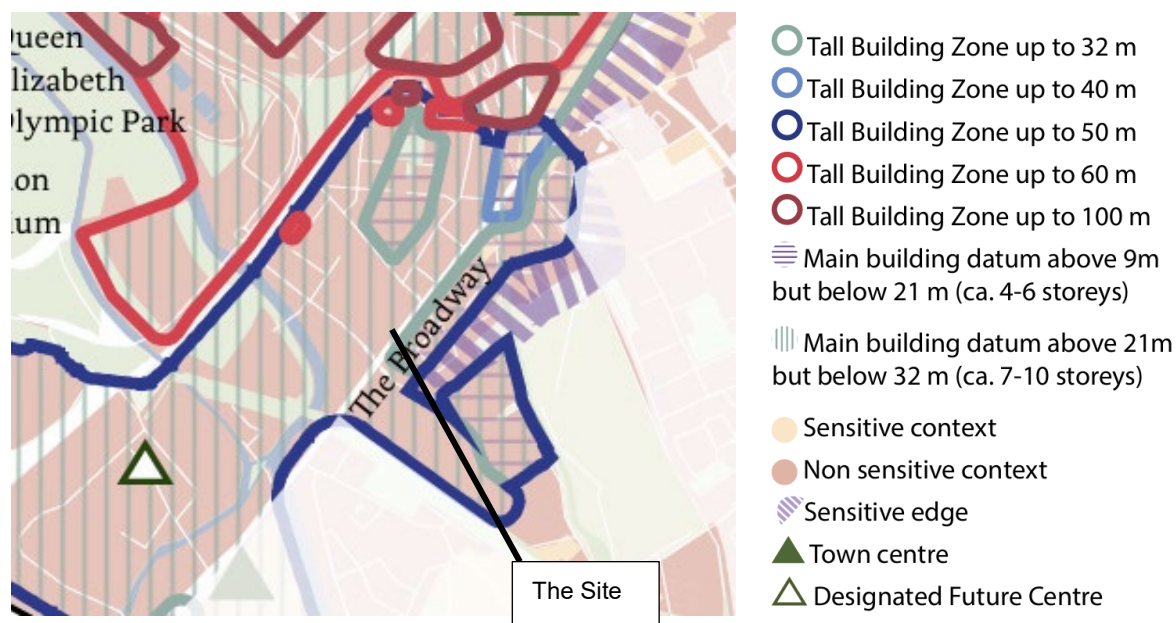
Paragraph 3.9.3 of the London Plan explains as follows:

**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. This does not mean that all buildings up to**

This text recognises that tall buildings are:

- 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].

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). Our clients are 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:



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.

Considering the above context, our clients conclude that part 1 of Policy D4, as set out on page 74 of the Draft Submission Local Plan (Regulation 22):

- Is not effective in helping to meet the identified needs of development in an appropriate (sustainable and using land efficiently) way that is consistent with national policy and the London Plan; nor
- 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.

To overcome these concerns, our clients seek the Inspector's agreement to revise draft Policy D4 as follows:

"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.*"

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**Stantec UK Limited**  
7 Soho Square  
London  
W1D 3QB  
UNITED KINGDOM  
[stantec.com](http://stantec.com)