



Newham Local Plan Examination

Matter 3: Spatial Strategy

Hearing Statement

November 2025

1. Introduction

- 1.1 This Hearing Statement has been prepared by the London Legacy Development Corporation (LLDC) to respond to matters identified by the Planning Inspectorate in its Matters, Issues and Questions (MIQs) report concerning the draft Newham Local Plan.
- 1.2 LLDC is a Mayoral Development Corporation that was formed to regenerate the area in and around the Queen Elizabeth Olympic Park (QEOP) following the legacy of the Olympic Games in 2012. Through its urban regeneration projects, the organisation is working on delivering sustainable and thriving neighbourhoods with a focus on housing delivery and good growth. LLDC has a number of strategic sites within the Borough of Newham.
- 1.3 LLDC has been in engagement with the London Borough of Newham (“Newham”) throughout the Regulation 18 and 19 public consultations of the draft Newham Local Plan and has also entered into two Statement of Common Grounds (SoCG) with Newham, referred to as Parts 1 and 2 (reference SD058). SOCG Part 1 was between Newham and LLDC as both local planning authority and landowner prior to the transition of planning powers from the LLDC back to boroughs at the end of November 2024, with a focus on strategic cross-boundary matters. SOCG Part 2 was between Newham and LLDC as landowner only with a focus on strategic development sites owned and/or managed by LLDC that will be impacted by the proposed policies.
- 1.4 The questions under Matter 3: Spatial strategy that the LLDC wish to provide comments on are as follows:
 - Q3.2 - Tall Buildings

2. Tall Buildings

Q3.2 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?

2.1 As part of our engagement with Newham, LLDC has raised concerns about the impact policy D4 (Tall Buildings) will have on the development of sites owned and/or managed by LLDC. These sites include:

- Bridgewater Triangle (BWT)
- Rick Roberts Way (RRW)
- Pudding Mill Lane (PML)

These sites have outline permissions for residential-led mixed use development, the first of which is the Legacy Communities Scheme (LCS) permission approved in September 2012 for a large-scale residential-led masterplan within and around QEOP (reference 11/90621/OUTODA as varied by 24/00115/VAR). The LCS permission has been varied a number of times since 2012, including Section 73 amendments to slot-out residential development to facilitate culture and education uses at sites currently known as Stratford Waterfront (SWFT) and University College London East (UCLE). As a result, new LCS Section 106 (S106) obligations were imposed on BWT, RRW and PML, to deliver more residential floorspace than permitted at each site to compensate for this loss of homes. BWT and PML both have new permissions that will supersede the LCS once implemented, while RRW will follow a similar process in due course.

2.2 In addition to above, the sites form part of a “portfolio approach” to affordable housing that was secured via the S106 agreement attached to the residential element of the SWFT hybrid permission (reference 18/00470/OUT). Together with SWFT, these sites must collectively deliver 50% affordable housing (all figures by habitable room), of which 30% must be low-cost rented housing and 70% intermediate housing. Portions of affordable housing to meet the requirements are split between the sites as follows:

- SWFT – 35% all intermediate
- BWT – 50% with a 70/30 intermediate and low-cost rent split
- PML – 45% with a 70/30 intermediate and low-cost rent split

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- RRW – The remaining balance to meet the 50% affordable housing by habitable room requirement and the 70/30 intermediate and low-cost rent split of the affordable units.

2.3 In policy D4 (Tall Buildings) of the draft Newham Local Plan, BWT, PML and RRW (together referred to as ‘Portfolio Sites’ in this statement) are within Tall Building Zone (TBZ) 18 and are all allocated within the 50m height limit (red boundary) as shown on the TBZ map of the draft Local Plan:

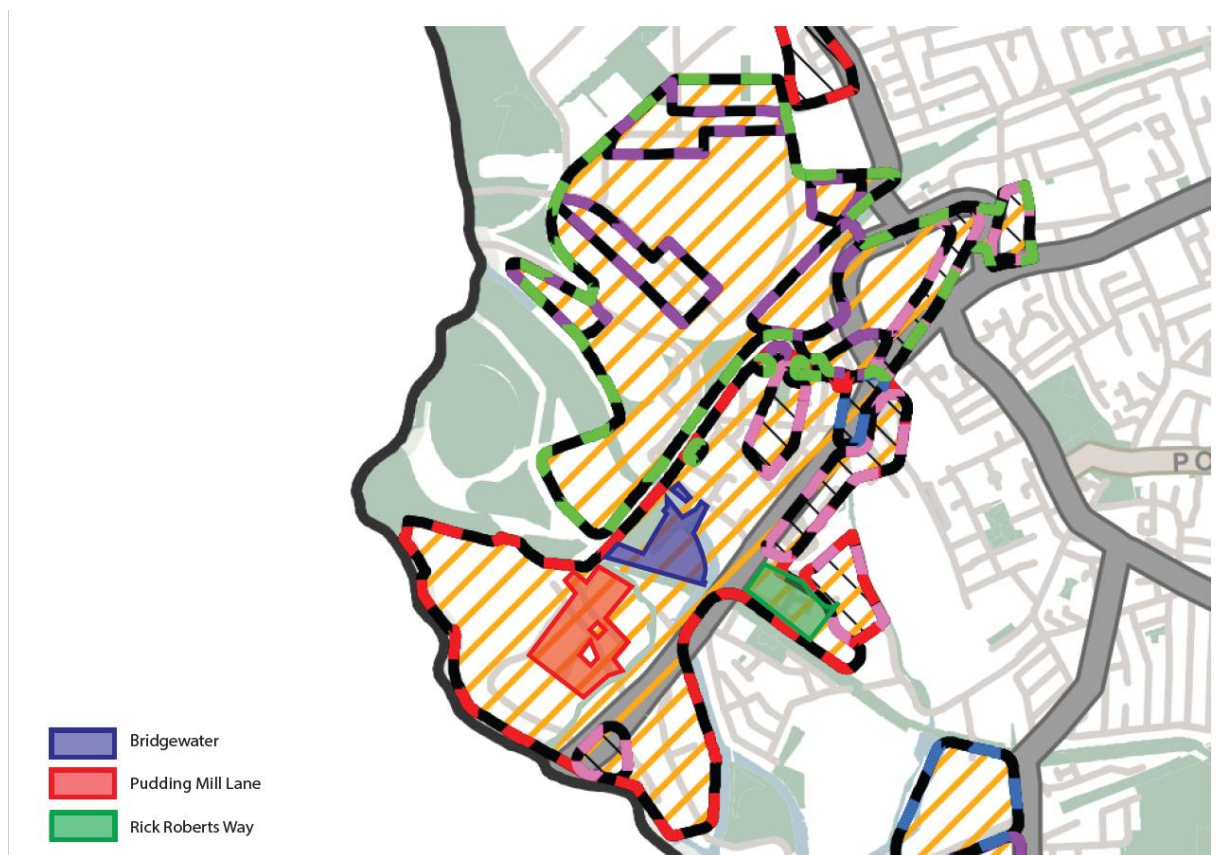


Figure 1 – Portfolio Sites in relation to the TBZ map¹

2.4 Given the requirements for our Portfolio Sites, and the current housing delivery challenges (as set out in our Regulation 19 consultation response) it remains our view that the policy is too restrictive. We believe the policy should be reconsidered with reference to extant planning permissions, site capacity requirements, increasing maximum heights where necessary and/or allowing targeted exceedances where such proposals are well designed, can demonstrate significant benefits to the townscape, and support deliverability. As currently drafted, the policy is not considered effective in meeting identified needs for housing as, if designed well, height can be conducive to viably

¹ Please note that the map is not accurate, but is mainly intended to locate the Portfolio Sites within the TBZs

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meeting affordable housing needs by optimising site capacity without compromising delivery of public realm, open space and other infrastructure required.

Pudding Mill Lane

- 2.5 PML is located just northwest of Stratford High Street and is bound by Bow Back River to the southeast, Barbers Road to the northwest, City Mill River to the northeast and the Legacy Wharf development to the southwest. The site has a new ‘slot-in’ permission (reference 21/00574/OUT) granted in September 2023 securing a greater quantum of residential floorspace in line with the LCS S106 obligation. The ‘slot-in’ permission comprises of mixed-use residential and commercial development with the inclusion of a proposed ‘Local Centre’ and up to 970 homes.
- 2.6 The proposed height limit of 50m at PML is below the height parameters of the outline permission referenced above, where maximum parameters of tall elements range between 40m and 95m. Pre-application discussions have been held with Newham throughout 2025 on the delivery of Phase 1 and 2A Reserved Matters applications which includes the relevant parameters of up to 95m, and the first of which is due to be submitted before the end of 2025. The proposed limit is therefore inconsistent with the outline permission and intended Reserved Matters applications for PML.
- 2.7 It is also noted that the PML outline planning permission was not included in Figure 12 ‘*Emerging building heights*’ on page 15 of the Tall Building Annex 2024 (reference EB023) of the Newham Characterisation Study 2024. In the Tall Building Topic Paper 2025 (reference TP001), Newham’s justification for excluding some planning permissions was that only permissions with substantial implementation were included in the emerging heights context. This appears inconsistent with Figure 3 ‘*Existing building heights*’ on page 11 of the Tall Buildings Annex, which recognises PML as the location for a ‘Designated Future Centre’, which will be established and delivered through the outline permission. The approved height parameters at PML will be a key signposting feature of the Local Centre, and as the Local Centre element of PML was included in the Study, it is considered that the approved height parameters should’ve also formed part of the evidence base.
- 2.8 The height limit set on this site within the emerging Local Plan is therefore not only inconsistent with the outline permission of PML and the emerging Reserved Matters applications, but is also inconsistent with the inclusion and recognition of the Local Centre in the Newham Characterisation Study 2024, that the permission is set to deliver. We therefore recommend that the height limits on this site are modified to allow for building heights up to 100m to reflect the extant planning permission for the site.

Bridgewater Triangle

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- 2.9 BWT is a triangular site bound by railway tracks to the west, Waterworks River to the north and east, and the Greenway to the south. Like PML, it has a new ‘slot-in’ permission (reference 21/00403/OUT) securing a greater quantum of residential floorspace in line with the LCS S106. The permission comprises approximately 575 homes and ancillary non-residential uses.
- 2.10 As set out in our Regulation 19 representation, the outline permission for BWT is being reviewed to address deliverability challenges, which has included reconsiderations of height to optimise the site’s capacity and ability to deliver affordable housing. As addressed in our *Matter 4: Neighbourhoods and Allocations* submission, the emerging design is now more aligned with Newham’s own assessment of site capacity where it is assumed that the site will deliver 680 homes as stated in Q4.10 of the MIQs.
- 2.11 In the emerging designs for BWT, which have been discussed with Newham officers, tall buildings in excess of 50 metres are located at key townscape threshold points or nodes, for example where the Greenway meets the railway and where the Greenway meets the Waterworks River, offering opportunities to enhance existing views when moving along the Greenway itself. The strategy is to increase heights to blocks on the perimeter of the site to enable the decrease in height to internal streets and courtyards to balance daylight/sunlight impacts. This includes ensuring appropriate levels of lighting are retained to the allotments adjacent to the development site.
- 2.12 As well as existing connectivity, new wider connectivity, including the new E48 Bridgewater Bridge, which will connect the new neighbourhood to Warton Road and the Carpenters Estate, reinforces appropriate locations for tall buildings as these frame new vistas as an entrance to the site when crossing the Waterworks River. This approach considers context, accessibility and architecture in the round rather than assessing height as a standalone subject.
- 2.13 Restricting building heights to 50m on this site would seriously hinder the ability of the LLDC and its JV partner to deliver development in accordance with Newham’s proposed site capacity of 680 homes. Given that the extant permission has a capacity of approximately 575 units, an increase in height is deemed necessary (to accommodate buildings up to 82m) to meet this higher target in a way that is consistent with the urban design principles outlined above. We would therefore recommend that the building height cap is increased at BWT to reflect current proposals, or sufficient flexibility is incorporated into the wording of the policy (as with the current LLDC Local Plan) to allow for specific exceedances to be permitted where this can be shown to be necessary to support delivery of housing.

Rick Roberts Way

- 2.14 RRW is located at Stratford High Street and is bound by the Greenway to the southwest, Rick Roberts Way to the northeast and a former gasholder site to the southeast. The extant permission for RRW currently remains the LCS outline permission, where the site encompasses land owned by LLDC and Newham. Land owned by LLDC will bring forward a residential development of approximately 400 units while the land owned by Newham is proposed to deliver a school.
- 2.15 As set out in paragraph 2.1 of this statement, the LCS permission as amended includes a S106 obligation for LLDC to submit a new planning application for RRW to deliver more residential floorspace than originally permitted, as such more than 400 units. A planning condition to deliver at least 1.2ha of publicly accessible open space across land owned by LLDC and Newham is also included in the LCS permission.
- 2.16 In addition to above, as set out in paragraph 2.2, there is also the obligation on RRW through the SWFT S106 to deliver the remaining balance of affordable housing to meet requirements of the portfolio approach. RRW also has an Urban Design and Landscape Framework (UDLF), which was jointly prepared by LLDC, Newham and St William, owners of the former gasholder site, which identified connectivity and public realm improvements for the wider site. This includes public realm improvements to Rick Roberts Way adjoining the site to the northeast, which is likely to require a portion of LLDC's land to accommodate cycling and pedestrian infrastructure.
- 2.17 Given the requirements set out above, LLDC is concerned that its site obligations (open space, affordable housing and residential floorspace quantum) and collective aspirations (connectivity and public realm improvements) will be difficult to achieve within the proposed height limits of policy D4. LLDC believes that there are opportunities to increase height beyond the proposed 50m limit, especially on those parts of RRW fronting Stratford High Street where a precedent for height has been established on neighbouring sites. It is therefore considered that policy D4 as currently drafted limits the site's capacity and is not effective to meet identified housing and development needs. In light of the requirements that RRW is expected to deliver (please also see Section 3 of the LLDC's response to *Matter 4: Neighbourhoods and Allocations*), the policy should be reconsidered, or incorporate sufficient flexibility in the wording (as with the adopted LLDC Local Plan) to allow specific exceedances where this can be well-designed and shown to be necessary to support delivery of housing.

Surrounding context

- 2.18 The scale of tall buildings that are being considered in the Portfolio Sites responds to the character of both the existing and emerging context of their vicinity. Both low and high-rise development surround the Portfolio Sites such as:

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- Tall buildings located along the north side of Stratford High Street including the Halo Tower (42 storeys / circa 126m) and River Heights (up to 25 storeys / circa 75m)
- Tall buildings within the Carpenters Estate Regeneration Masterplan with Outline Consent located along the railways (ranging in heights from 18 storeys / circa 54m to 40 storeys / circa 120m) (reference 22/00360/OUT)
- Tall marker building approved at the St William former gasholder site of approximately 17 storeys / 57m which was sensitively designed and was required to be stepped down to reflect proximity to the neighbouring conservation area (reference 23/00457/FUL)

2.19 LLDC is of the view that the surrounding context sets a precedent for height at and around the Portfolio Sites, which is not reflected in policy D4.

3. Summary

- 3.1 This Hearing Statement responds specifically to Q3.2 under Matter 3: Spatial Strategy of the Inspector's MIQs relating to draft policy D4 (Tall Buildings). It summarises LLDC's concerns about the policy, in particular the inconsistency with extant permissions, its ability to reflect site requirements, and therefore its ineffectiveness in meeting identified housing and development needs.
- 3.2 The above concerns have specifically been expressed in regard to LLDC's Portfolio Sites, all of which will deliver major development with significant benefits, including affordable housing, public realm and connectivity improvements. As currently drafted, it is considered that enforcing the proposed capped height limits through policy D4 at these sites, without any degree of flexibility, has the potential to negatively impact their deliverability, and those of other sites, and the realisation of the many benefits they could offer.