



Our Ref: SPEC/Albert Island

02 March 2018

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London
SE1 2AA

[BY EMAIL]

Dear Sir

**ALBERT ISLAND, ROYAL DOCKS, LONDON
SUBMISSION OF REPRESENTATIONS IN RELATION TO NEW DRAFT LONDON
PLAN (2017)**

We have been instructed by our client, London + Regional Properties ('L+R'), to submit the enclosed representations in relation to the draft new London Plan (the Spatial Development Strategy for Greater London) (the 'draft London Plan'). The draft London Plan was published on 1 December 2017 for a 13 week consultation period, ending on 2 March 2018.

L+R have an interest in developing Albert Island at Royal Docks/Beckton Riverside for an employment-led mixed use development which will deliver substantial benefits to the local area, the London Borough of Newham ('LBN') and more strategically within Greater London. L+R welcome the opportunity to make representations on the draft London Plan, which will play a key role in guiding development future in London.

This letter firstly sets out the background to L+R's representations (including the emerging development proposals at Albert Island), secondly summarises the current planning policy position and concludes with specific comments on the draft London Plan policies (with a specific focus on designations and employment/industrial related policies).

1. Background Context

The Site

Figure 1 below outlines the extent of the red line boundary for redevelopment and separately, the extent of Gallions Lock to the south of the site:

65 Gresham Street
London
EC2V 7NQ

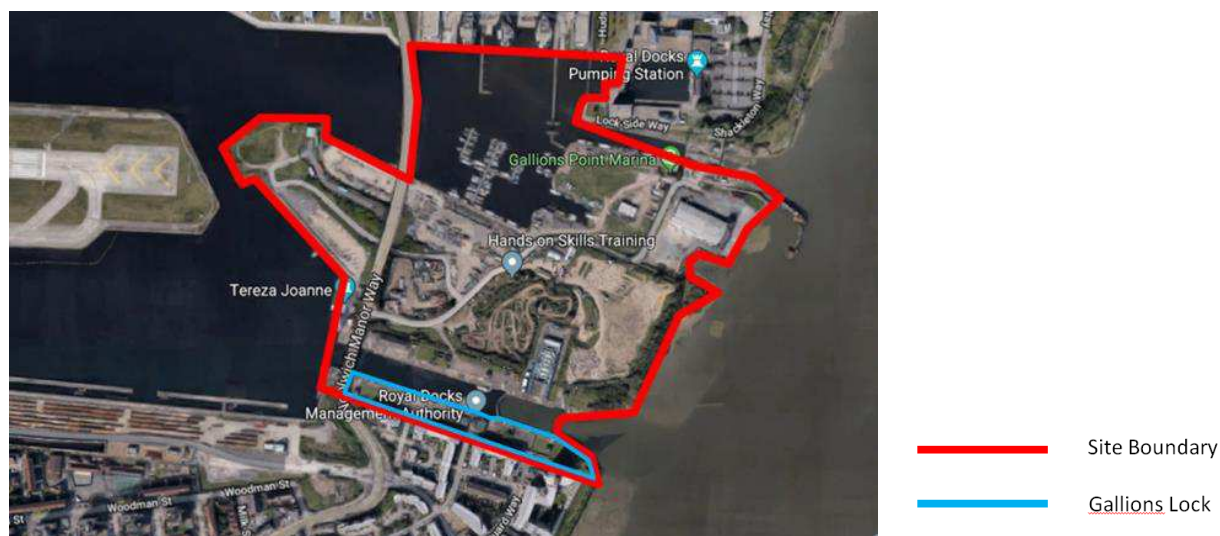
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Figure 1: Site Boundary



The site comprises an island located to the east of London City Airport. The site is connected to the north and south by Woolwich Manor Way, which bridges the site to the University of East London and Gallions Reach DLR Station to the north, and to the south to Albert Road and Royal Victoria Gardens.

The site is bound to the north by the Royal Docks Pumping Station, to the east by the River Thames, to the south by Felixstowe Court residential development and to the west by Woolwich Manor Way/Gallions Point Marina.

This brownfield site comprises a number of existing uses, including a marina, a dirt bike track and construction training centre. Notwithstanding this, the site is not well utilised and the existing uses on site do not provide high levels of employment floorspace or jobs.

As identified in Figure 1 above, Gallions Lock is located within the south of the wider Albert Island site boundary. Gallions Lock currently comprises a number of temporary containers and an area of hardstanding alongside the waterway which forms the northern boundary of this part of the site.

L+R Development Objectives

The overarching strategic objective of L+R's scheme is for the employment-led regeneration of the site, and improving transport capacity. Gallions Reach DLR station to the north of the site is identified for major investment in transport infrastructure through a proposed DLR extension from Gallions Reach.

L+R are seeking to achieve the following objectives for Albert Island, which have influenced the nature of the emerging scheme:

- Comprehensive development of the site to include a sustainable 'employment hub' of workshops, warehouses and offices, a new Shipyard facility with a mix of uses, improved public realm and access links and an enhanced river frontage;
- A range of uses are proposed to ensure that the scheme integrates with existing and consented neighbouring uses and features, including the River Thames, London City Airport and surrounding residential areas;

- To ensure the long term sustainability and viability of the proposals, the L+R scheme will provide a range of services and facilities to support the large new community of workers and residents. The provision of these supporting services will be required to encourage businesses to take up the new commercial space and has been a feature of L+R's discussions with prospective commercial operators. The provision of a range of supporting uses on site will also ensure a sustainable development whereby workers / residents of the Island will be within proximity of day-to-day services and will not be required to travel significant distances to access them. This will ensure that the redevelopment creates a new community on the Island to ensure this becomes a 24/7 working and living community.

Based on the above, L+R is considering delivering the following:

- Commercial Shipyard facility (subject to viability and Port of London Authority approval), which would serve London, the south east and beyond;
- Leisure Marina;
- Community facility for marine associated activities;
- New employment hub (multi-storey workshops, warehouses and offices), including for start-up businesses;
- Education / Training Centre;
- Hotel;
- Potential for London City Airport expansion scheme;
- New homes, including affordable housing;
- A high quality riverside walk (the Capital Ring Walk);
- Improved pedestrian and vehicular routes; and
- Ancillary active ground floor uses (to include retail, public house and workshops).

The following quantum of floorspace is proposed as part of the above mix of uses:

Use	Quantum of Floorspace (sqft)
Commercial Shipyard	Circa 125,000
Commercial	Circa 440,000
Hotel	Circa 50,000
Residential	Circa 125,000
Ancillary Retail/Café/Pub	Circa 8,000
Fire station	Circa 6,000
Total	Circa 754,000 sqft

L+R have already started discussions with, and will continue to liaise with, commercial operators and workspace providers to ensure that the design of the commercial floorspace meets their needs. This includes the layout and usability of the commercial units themselves but also the wider offer that the development provides to these commercial operators.

The proposed mix of uses above is also subject to on-going discussion with London City Airport in relation to the Public Safety Zone located at the eastern end of the runway, as illustrated in Figure 2 below:

Figure 2: City Airport Public Safety Zone (LBN Local Plan Policy Map (2016))



2. Existing Planning Policy Position of Albert Island

This section summarises the relevant existing key planning policies in relation to the site.

National Planning Policy Framework (NPPF) (2012)

Paragraph 160 states that local planning authorities should have a clear understanding of the business needs within the economic markets operating in and across their area. To achieve this they should work together with county and neighbouring authorities and with Local Enterprise Partnerships (LEPs) to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.

The NPPF defines LEPs as 'a body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area'.

The London Plan (The Spatial Development Strategy for London Consolidated with Alterations Since 2011) (2016)

The Royal Docks and Beckton Waterfront are identified as an Opportunity Area (OA) in the London Plan. The area is identified as having an indicative employment capacity of 6,000 jobs, and at least 11,000 new homes. The vision for the OA is:

'The Royal Docks will return to its former glory at the forefront of international trade and exchange. The regeneration of Silvertown Quays, Royal Albert Dock and Royal Albert Basin should build upon innovative and iconic developments such as the Siemens Crystal and the Emirates Air Line cable car. The EZ will support its role as a world class business destination with capacity for at least 6,000 jobs [...] Thameside East, West and Beckton Waterfront are also key locations for river related industries. The management of safeguarded wharves, including scope for consolidation, will be an important issue in realising the potential of these sites'.

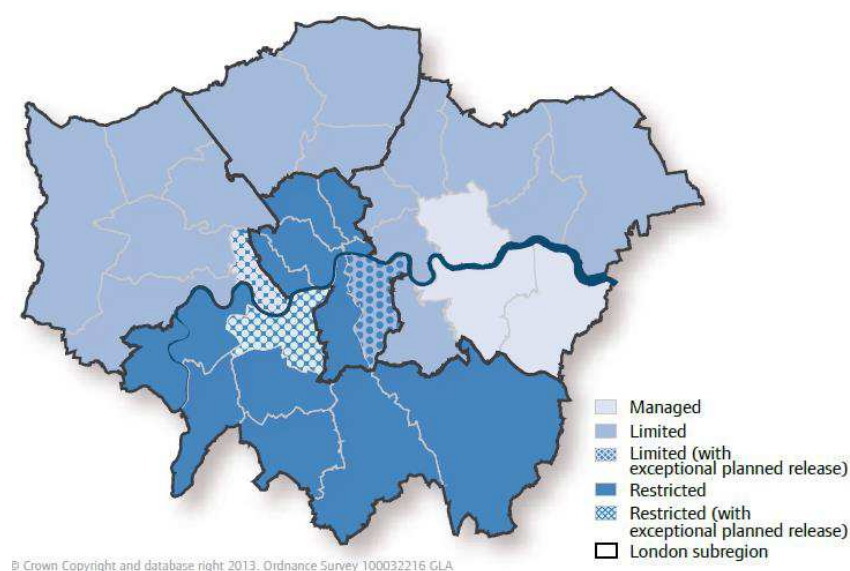
London Plan Policy 4.4 'Managing Industrial Land and Premises' states that the Mayor will work with boroughs to adopt a rigorous approach to industrial land management to ensure a sufficient stock of land to meet future needs. The policy also seeks to plan and manage release of surplus industrial land where this is compatible in appropriate locations, especially to provide more housing.

The Policy continues to state that Local Development Frameworks (LDFs) should demonstrate how the borough stock of industrial land will be planned and managed in local circumstances, taking into account (inter alia):

- The borough level groupings for transfer of industrial land to other uses as illustrated in Map 4.1 of the London Plan and strategic monitoring benchmarks for industrial land release in supplementary planning guidance; and
- The potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing.

London Plan Map 4.1 is illustrated in Figure 2 below. The Map identifies LBN for managed release of industrial land to other uses.

Figure 3: Borough Level Groupings for Transfer of Industrial Land to Other Uses



Paragraph 8.6A states that the Mayor will work with partners including boroughs and communities to realise the potential of large development areas. Where appropriate, this may include promoting Enterprise Zones (EZ).

The London Plan defines EZ as 'designated by Government working with Local Enterprise Partnerships and other partners to provide incentives for business to invest including business rate discounts and, to support regeneration, local retention of growth in business rates for 25 years. London's Local Enterprise Partnership drives the activities in the capital's first EZ, the Royal Docks, which was designated in 2011'.

Local Planning Policy

The Newham Local Plan Policies Map (2016) currently designates the site as a Local Industrial Location (LIL) as illustrated in Figure 4 below. LIL are detailed within Policy J4 'Managing a Mixed Use Borough' of the Newham Local Plan Detailed Sites and Policies Development Plan Document (DPD).

Figure 4: Newham Policies Map Extract



It is relevant to note that Gallions Lock is neither currently designated as LIL nor is it proposed to be designated as LIL.

The site is not identified as a Strategic Industrial Location (SIL).

The majority of the site is therefore currently designated for employment and industrial use within the Local Plan and continues to remain so within the draft Newham Local Plan Review. It should be noted that in January 2018 GVA (on behalf of L+R) submitted representations to the LBN Local Plan Review which seek provide an element of flexibility within the LIL designation to allow for complimentary uses (such as retail, drinking establishments, educational/training facilities, marine facilities, hotel and residential) to support the proposed employment uses. As part of an employment-led mixed use scheme, complimentary uses at Albert Island are necessary to ensure good place making principles are followed and to ensure the long term sustainability of the employment spaces.

3. Representation Comments on Draft London Plan

L+R's proposals are supported at national, regional and local level as it will result in the employment-led regeneration of brownfield land at Albert Island.

The NPPF states that employment land allocations should be reviewed regularly and that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land should be treated on their merits having regard to the relative need for different land uses to support sustainable local communities.

The site is currently underutilised and the proposals would deliver a mixed use, employment led sustainable development to secure the long term viability of the site into the future.

Opportunity Area Designation

The draft London Plan retains the designation of the Royal Docks OA, stating that the area sits at the heart of the Thames Gateway presenting one of the largest regeneration opportunities in London. Paragraph 2.1.48 states that:

'The Mayor has established the Royal Docks Delivery Team to guide development of the Enterprise Zone and surrounding Opportunity Area. The area contains a number of safeguarded wharves, and there is a continuing need to retain wharf capacity. The Planning Framework should set out how wharves could be consolidated to deliver more effective and efficient industrial uses alongside residential/mixed use. The area has significant areas of SIL and recent evidence confirms that there is a continued demand for industrial space in the east of London. The Planning Framework should ensure industrial capacity is managed in ways that reduce overall vacancy rates and support the intensification of industrial, logistics and commercial uses so that they continue to form part of the overall mix of uses in the area'.

L+R welcome the identification that the Royal Docks OA should support the intensification of industrial, logistics and commercial uses as part of the overall mix of uses in the area.

Unlike the current London Plan, the draft London Plan does not set any minimum thresholds for the delivery of jobs and homes within the OA. L+R's proposals would deliver an estimated 7,000 new jobs, and whilst we acknowledge that the removal of minimum employment targets seeks to provide flexibility, it is hoped that the capacity that the site at Albert Island has to contribute to the provision of jobs in the OA (and LBN) is recognised by the GLA.

Draft Policy E4 Land for Industry, Logistics and Services to Support London's Economic Function and Draft Policy E5 Strategic Industrial Locations

Draft Policy E4 requires that a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be maintained. Part B of draft Policy E4 divides land and premises for industry, logistics and services into three categories:

- SILs;
- Locally Significant Industrial Sites (LSIS); and
- Non-Designated Industrial Sites (sites which are not designated in Local Plan policies/maps).

Table 6.2 and Figure 6.1 of the draft London Plan (illustrated in Figure 3 on the next page) continues to identify LBN as a location for managed release of industrial floorspace.

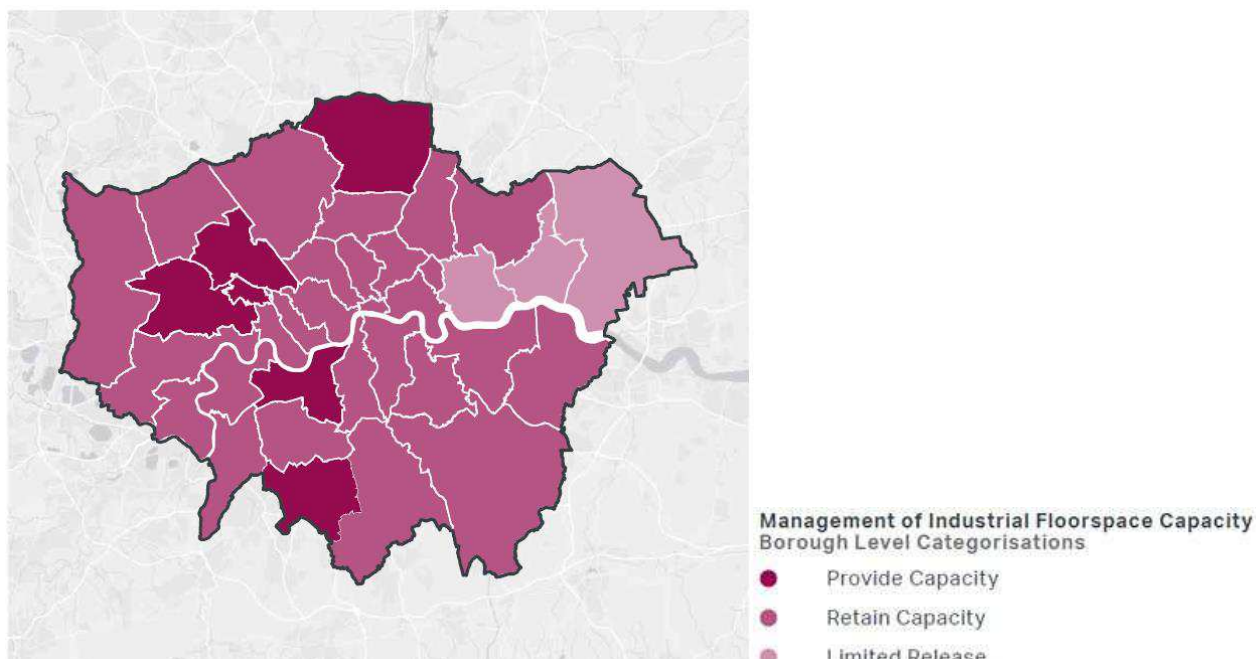
Draft Policy E4 goes on to advise that any release of industrial capacity should be focused in accessible locations close to education and other infrastructure. Whilst the managed release of employment land is to be supported, it should be noted that L+R do not propose the release of Albert Island from LSIS, instead they are working with LBN to ensure that the LIL designation is sufficiently flexible to allow an employment-led scheme, with complementary uses, to come forward.

Draft Policy E5 relates to SILs, and specific SILs are outlined in Table 6.3. As per the current London Plan, Albert Island is not designed as a SIL in the draft London Plan.

L+R support the continued recognition in the London Plan that Albert Island is not designated as SIL. The Draft Royal Docks Opportunity Area Planning Framework (OAPF) (2016) had proposed that Albert Island could be designated as a new SIL, which L+R consider would provide an overly restrictive

requirement to protecting and intensifying the employment function of the area, without providing sufficient flexibility to support a range of alternative uses to support the delivery of commercial space. Accordingly, continuity between the current and proposed London Plan regarding SIL designations is welcomed.

Figure 5: Management of Industrial Floorspace Capacity



Draft Policy E6 Locally Significant Industrial Sites

Draft Policy E6 requires local planning authorities to define boundaries and policies for LSIS. The draft policy directs Councils to clearly identify the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 uses suitable for SMEs, and those that can accommodate a wider range of business uses. Designations should be based on evidence from local demand assessments.

The LBN Employment Land Review (ELR) (2017) reviews Albert Island and identifies that the site currently comprises low intensity use, but that the area is well located in relation to the strategic road network. The site is identified as having significant scope for intensification of employment uses (provided that airport safety is considered), making use of direct access to the dock and river access. The ELR recognises that the site will be comprehensively redeveloped.

L+R welcome the requirement for local planning authorities to define their own specific policies for LSIS based on evidence, but also consider that LPA designations need to provide an element of flexibility within certain LSIS in order to provide complementary uses to create a sense of community and improve viability.

The proposed business uses, the Shipyard, London City Airport expansion, the new employment hub (those B1(c), B2 and B8 uses) would achieve the objectives of the LBN LIL designation as it would deliver employment generating uses.

The scheme will also have a number of complimentary uses which will ensure a mixed-use community. This will function throughout the day and night, integrate into the neighbouring urban

grain and provide on-site facilities for future workers and residents which will in turn help to attract industrial operators. Indeed L+R consider these complimentary uses are essential in order to ensure that the overall scheme is successful and that Albert Island meets its full potential as an industrial-led site.

Some of these complimentary employment uses may not be considered to be fully compliant with the LIL designation. This includes the proposed retail uses, the public house, the educational / training centre, the community marine facility, the hotel and new homes.

Notwithstanding this, as outlined above, we consider that these complimentary uses are necessary to ensure critical place making capabilities and the long term sustainability of the predominant employment uses that are supported by planning policy. Therefore by providing these complimentary uses, this will help to achieve the overall GLA and LBN employment policy objectives for the site as well as achieving a mixed-use neighbourhood, which is also supported by planning policy.

Draft Policy E7 Intensification, Co-location and Substitution of Land for Industry, Logistics and Services to Support London's Economic Function

Draft Policy E7 supports the intensification of business uses on industrial land. L+R support this policy, as this will enable the future development proposals at Albert Island to deliver increased employment floorspace and job provision at the site.

Part C of Draft Policy E7 requires planning frameworks to be *'proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal'*.

L+R strongly support the principle of primarily employment-led development within LSIS being co-located with housing and other facilities. This will enable Albert Island to create a sense of place, help integrate the scheme into neighbouring developments, as well as generating a significant increase in jobs and additional river-related activity. Co-locating complementary uses are considered by L+R to be necessary to encourage future businesses to be attracted to Albert Island as it will ensure that employees have easy access to local day-to-day facilities, without having to travel significant distances. Another key aspect of co-locating residential uses with industrial is that it would help create a new Albert Island community; functioning day and night, during the week and weekend.

4. Summary

The Albert Island site is currently significantly underused and provides very limited job opportunities. L+R welcome the draft policies in the draft London Plan which continue to support the intensification of employment uses on industrial sites. L+R also strongly support the proposed co-location of housing and other facilities within LSIS, where there is intensification of employment generating uses. Delivery of the employment-led mixed use redevelopment of the site would enable a higher quality scheme to be delivered with significant job opportunities.

L+R consider that draft London Plan policies reviewed in this representation for the site at Albert Island have been positively prepared, justified, effective and consistent with national planning policy.

In summary, for the reasons given above, L+R support the proposed draft London Plan policies, which will provide a positive framework to enable regeneration within the Royal Docks OA.

We would be grateful if you could confirm receipt of this representation and keep us informed of the next steps in the consultation. If you would like to discuss any aspect of these representations in further detail, please contact Richard Quelch or Rachel Crick of this office.

Yours faithfully



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Associate

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For and on behalf of GVA Grimley Limited