

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

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**Our ref:** LDF25/LDD12/CG01  
**Date:** 16 January 2018

**Sent by email to:** [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)

Dear Sophie,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations  
2012**

**RE: Newham Local Plan Review – Proposed submission draft (Regulation  
19) Consultation**

Thank you for consulting the Mayor of London on Newham's Local Plan Review Proposed Submission draft (Regulation 19). As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments previously on Newham's Issues and options stage on 13<sup>th</sup> April 2017.

The Mayor is of the opinion that Newham's draft Local Plan is in general conformity with the London Plan, subject to two minor amendments to the proposed SIL boundaries at Silvertown Landing / Thameside west and Beckton Riverside and no de-designation of Metropolitan Open Land and open space. The Mayor has afforded me delegated authority to make more detailed comments on the draft Local Plan on his behalf.

Transport for London (TfL) has provided detailed comments on the Local Plan document and Infrastructure Delivery Plan, which I endorse, and which are attached below at Annex 1.

**The London Plan**

As I am sure you are aware, the Mayor published his draft London Plan for consultation on 1<sup>st</sup> December 2017. It is anticipated the Examination in Public of the draft London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Newham's Development Plan and contain the most up-to-date policies. The Newham Local Plan is required to be in general conformity with the current London Plan, however any policies that diverge from the draft London Plan will become out of date as the draft London Plan gains more weight as it moves towards publication. In addition, the draft London Plan and its evidence base will now be a material consideration in planning decisions.

In this regard, the Mayor recognises that Newham is at submission stage and has prepared its draft Plan and evidence base prior to the publication of the draft new London Plan. The draft Local Plan sets a clear plan for growth and addresses many important policy areas such as the consolidation of SIL and the more efficient use of land in the Arc of Opportunity. However, once the draft London Plan is published, Newham will require a more comprehensive strategy for delivering additional homes from small sites in order to deliver its new housing target. With regards to large sites in the Royal Docks Opportunity Area, GLA and Newham officers are working together to identify the full housing capacity of these sites.

In light of the above, the Mayor would expect Newham to carry out an early review of its Local Plan to take into account its increased housing target, the draft London Plan small sites policy and other matters, with a view to supplementing its growth policies.

## **General Comments**

Newham is set to deliver a significant amount of new development in its 'Arc of Opportunity' which includes Royal Docks & Beckton Waterfront Opportunity Area, Stratford/Olympic Park and other strategic sites. Newham officers have worked and continue to work with GLA and TfL officers to help the Council realise its growth ambitions for the borough, including consented development for 13,129 new homes and 26,799 jobs and a further 12,500 new homes and 22,500 jobs in the Royal Docks Opportunity Area. The GLA, TfL and Newham Council have been working together to produce a draft Opportunity Area Framework (OAPF) for the Royal Docks and Beckton Riverside. A working draft was published in March 2016. My officers welcome the ongoing discussions on detailed proposals for the Royal Docks OA and other strategic sites that will inform the finalisation of the Royal Docks Opportunity Area Framework.

## **Vision and Spatial Policies**

The Council's positive approach to development and regeneration opportunities, its aspirations for growth and becoming an important economic contributor to the London-wide economy are welcomed. The spatial strategy focuses continued growth at Stratford and West Ham, primarily on three strategic sites, including the delivery of 4,286 homes and a significant amount of employment and retail floorspace. Royal Docks is to become a mixed use urban quarter with the capacity to deliver approximately 8,404 additional homes and a significant number of jobs from seven strategic sites. Canning Town and Custom House are to deliver 15,608 additional homes as well as additional jobs and infrastructure through managed Strategic Industrial Land (SIL) release. Beckton is to deliver approximately 5,278 homes on four strategic sites, through partial managed release of SIL. Urban Newham is projected to deliver approximately 7,856 homes around the smaller urban centres.

Growth in Newham will be supported by the opening of the Elizabeth line in 2019.

## **Successful Places**

### Tall Buildings

The Local Plan's proposed definition of a tall building as one with six or more storeys is too low. The tall buildings matrix (policy SP4) is overly restrictive for the lower heights 5 – 8 storeys, which should not qualify as tall buildings. The policy effectively restricts most of the

borough to 4 storeys and therefore the scope for optimising housing and employment potential is similarly restricted. Suitable and robust evidence is required to justify the height limits set in the matrix. The Mayor is of the opinion that the Tall Buildings 2017 evidence base document does not fully justify the height limits set in the tall buildings matrix. The draft London Plan (para 3.8.1) states that high density does not need to imply high rise, but tall buildings can form part of a strategic approach to meeting regeneration and economic development goals, particularly in order to make optimal use of capacity of sites which are well-connected by public transport and have good access to services and amenity.

The Mayor strongly suggests that the tall buildings policy and matrix be amended to be less restrictive, particularly in the Urban Newham and the Arc outside Strategic Sites, Stratford Metropolitan Centre and Canning Town Centre areas. Both the tall buildings policy areas of Stratford Metropolitan Centre and Canning Town could be extended. Identifying sites for tall buildings through site allocations is likely to restrain development. A more flexible policy and matrix approach would allow for the opportunity to develop taller buildings in appropriate places throughout the borough outside the main strategic areas, and enable further scope for housing delivery and employment opportunities.

## **Jobs, Business and Skills**

### Business and Jobs Growth

The published London Plan projects jobs in Newham to grow by 18 per cent to 102,000 jobs by 2031. Much of this growth is projected for Stratford Town centre which is identified in the published and draft London Plan as having the capacity, demand and viability to accommodate new speculative office development. In the draft London Plan Stratford is identified as a future potential CAZ satellite.

In addition to Stratford, the Mayor welcomes economic growth in the Arc of Opportunity and employment hubs, whilst consolidating SIL, as well as in the employment areas in Urban Newham, notably its Town Centres. The Mayor welcomes the support for small-scale start-ups and/or cultural and creative workspace in line with London Plan policy 4.6 and draft London Plan policies E3 Affordable workspace and E8 Sector growth opportunities and clusters.

The Mayor supports Newham's initiatives in draft policy J3 of the Local Plan Review to provide employment for local people, in line with London Plan policy 4.12 and draft London Plan policy E11.

### Changes to Strategic Industrial Land (SIL), Local Strategic Industrial Sites (LSIS) and other employment designations

The Royal Docks area has approximately 293ha of SIL. In the London Plan, Newham is part of the borough groupings for 'managed' release of SIL for other uses. The Mayor's Land for Industry and Transport SPG has an indicative annual SIL release of 5.3 ha or 106 ha for the period 2011 – 2031 for Newham. The draft London Plan proposes a more restrictive approach to SIL release as London-wide there has been a much greater release of industrial land than that stipulated in the London Plan monitoring benchmarks. However, Newham is still identified as a borough that can release a limited amount of protected industrial land (Table 6.2). The Local Plan review proposes to release 41.05ha of SIL, less than the 79ha indicated in the draft Royal Docks OAPF, which is welcomed.

GLA research indicates that Newham has the highest industrial land vacancy rates in London. There is therefore scope to reduce these vacancy rates through more efficient use of land and carefully managed release to other uses. My officers have been working with officers at Newham to agree and coordinate SIL release in light of the emerging Royal Docks OAPF and the qualitative and quantitative evidence in the borough's local employment land review, including matters relating to wharves and transport. The detailed results of these discussions have been reflected in the Newham's draft Local Plan, including through its site allocations, except at the sites Silvertown Landing / Thameside west and Beckton Riverside.

The SIL boundary at Silvertown Landing/ Thameside west must reflect the potential Silvertown Crossing alignment, including a buffer. The SIL boundary as proposed could potentially leave a small triangle to the north-east of the tunnel to the river crossing undesignated and therefore suggests it is suitable for housing. It is not considered such a remnant site would be suitable for housing and therefore this area, along with a buffer zone to the proposed tunnel should retain its SIL designation. See diagram 1 at Annex 2.

In addition, the Mayor objects to the de-designation of the land to the south of the DLR depot at Beckton Riverside. TfL has confirmed that it will require this land for the expansion of the DLR Depot and therefore the site should remain as SIL.

Any further release of SIL suggested by draft Local Plan policy J2 2b could only be considered where there is no loss of industrial floorspace, in line with draft London Plan policies E4 to E7.

The Mayor welcomes the specific Design and Technical Criteria policies that are aimed at managing the release of employment land and ensuring that the employment floorspace re-provided is appropriate and functional.

## **Town centres**

Annex 2 of the London Plan identifies the existing roles and functions of London's town centres. The current and draft London Plans identify Stratford as a Metropolitan centre. In the draft London Plan (Annex One), Stratford is identified as a potential future International centre with the potential to be a CAZ satellite. However, it is also a strategic area for regeneration. The latest evidence identifies Stratford as having a regionally or sub-regionally significant night-time economy and a high potential for commercial and residential growth and the capacity, demand and viability to accommodate new speculative office development.

East Ham is identified as a Major centre in both the published and draft London Plans with medium potential for commercial growth and a high potential for residential growth. East Ham is also identified as being in a strategic area for regeneration.

Canning Town, East Beckton, Forest Gate and Green Street are identified as District Centres. All the centres, except for Forest Gate have a high potential for residential growth. Canning Town and Green Street have the potential for medium commercial growth, while this potential at East Beckton and Forest Gate is low. All these centres are identified as being in a strategic area for regeneration.

These classifications are reflected in the draft Local Plan Review (policy INF5). The Mayor welcomes the requirement for new publicly accessible toilets in new strategic development in local or town centres, in line with draft London Plan policy S6 Public toilets.

The draft London Plan also notes the potential for Gallions Reach to become a Major Centre with medium potential for commercial growth and a high potential for residential growth. The draft Newham Local Plan notes the need for a masterplan for the area in order to re-configure the floorspace and secure a more rounded retail offer and mix of uses, in line with paragraph 2.7.4 of the draft London Plan.

### Culture and the night-time economy

The approach to focus promoting town centre uses including visitor economy, evening and night-time economy in Stratford metropolitan is supported in line with Annex Two of the published London Plan and Annex One of the draft London Plan. The Mayor has made a commitment to growing London's night time economy, particularly in suitable locations outside Central London and the Central Activities Zone (CAZ). Similarly, the Mayor is keen to promote creative/cultural workspaces, cultural venues and cultural quarters and has strengthened policies in the draft London Plan to do this. Newham's proposed policies to support culture and the night time economy are therefore welcomed.

The 'agent of change' principle has been included in the draft London Plan to help protect existing public houses, music venues, night clubs and other noise generating activities from noise complaints arising from new development. This will also ensure that residents in new developments close to existing noise generating uses are also protected from noise impacts through better acoustic design and other measures in line with London Plan policy 4.6 C f and draft policy D12 Agent of Change. The inclusion of the 'agent of change' principle in Policy SP8 is therefore supported.

## **Housing**

### Housing targets

Newham's draft Local Plan Review commits to delivering 2,867 homes a year, excluding the LLDC area. It's published London Plan target is 3,076, including the LLDC area. The LLDC committed to delivering 1,471 in its Local Plan based on the 2013 London SHLAA. Overall, Newham's proposed housing target is acceptable, however Newham is advised that once the draft London Plan is published it will be monitored against its new London Plan monitoring housing target of 3,850. Therefore, Newham is strongly encouraged to carry out an immediate review of its Local Plan in order to identify sources where additional housing capacity will be brought forward, including from small sites and accessible locations, such as those around the new Elizabeth line. In this regard draft Local Plan policy H1f should acknowledge that in some areas local character will evolve over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density as set out in draft London plan policy H2B1.

### Affordable housing

The Mayor welcomes Newham's proposed target that 50% of all new homes are affordable units. It should be noted that draft London Plan paragraph 4.6.3 states that this should be measured in habitable rooms. Newham should adopt the approach set out in the Mayor's Affordable Housing and Viability SPG 2017 and draft London Plan policy H6 which sets a minimum threshold of 35% affordable housing, without subsidy and 50% on public sector and industrial sites to be released.

## Housing mix

As set out in policy H12 (Housing size mix) of the draft London Plan, boroughs should not set prescriptive size mix requirements for market and intermediate homes. This includes blanket requirements for the size-mix of the cross-tenure supply. Such requirements are inflexible and can fail to meet the intended need, for example, family-sized homes often end up being occupied by sharing adults rather than families, and inflexible requirements can prevent otherwise suitable sites coming forward for residential development. Boroughs should provide guidance on their preferred size mix of low cost rent homes, as these can be expected to directly contribute to meeting identified needs.

## **Transport**

Transport for London (TfL) has provided detailed comments, attached below at Annex 1. It should be noted that the Mayor fully supports TfL's objection to the proposed de-designation as SIL the land south of the DLR depot at Beckton as it proposes to expand the DLR depot.

## Safeguarded Wharves

Stakeholders including GLA Property, Port of London Authority (PLA), LB Newham, GLA Planning and TfL have been working together for over ten years to put in place a proposal for the consolidation of wharves in the Royal Docks area and beyond. The draft Local Plan Review proposes to rationalise and relocate safeguarded wharves onto Central Thameside West. Any proposals not to use/retain the safeguarded wharves will need to be properly justified. The GLA is undertaking a review of all safeguarded wharf sites in London at present and this should be reflected in the draft Local Plan Review.

## **Social Infrastructure**

Strengthening policies to protect pubs and other community facilities is supported and is in line with the draft London Plan. Similarly, as stated above, requiring new development to provide new publicly accessible toilets which are particularly important to certain groups is welcomed.

## **Metropolitan Open Land (MOL) and Open Space**

The de-designation of MOL and open space are contrary to London Plan policies 7.17 and 7.18, respectively. The land to be de-designated appears to be open car parks which are ancillary to the use of the MOL and open spaces. They do not detract from the openness of these open spaces, whereas their de-designation could result in their substantial development which would detract from the openness of the MOL and open spaces. With regards to Beckton Sewage Works, the proposed de-designation would sever the site, especially the part to the south-west. Retention of designation would not prevent expansion of sewage treatment facility, but would ensure it is done sensitively to the wider MOL.

I welcome the continued collaboration between my officers and those at Newham on the draft of the Royal Docks OAPF. In the mean time, if you have any specific questions regarding the comments in this letter please do not hesitate to contact Celeste Giusti on 020 7983 4811 or at [celeste.giusti@london.gov.uk](mailto:celeste.giusti@london.gov.uk).

Yours sincerely



Juliemma McLoughlin  
**Chief Planner**

Cc Unmesh Desai, London Assembly Constituency  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL

## Annex 1

### Comments from Transport for London (TfL)

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16 January 2018

Dear Sophie,

#### **Newham Local Plan Proposed Submission – TfL comments**

Thank you for the opportunity to comment on the Proposed Submission document, and the Infrastructure Delivery Plan.

TfL Commercial Development will respond separately in TfL's capacity as a significant local landowner and as a property development function.

These comments are made in conjunction with the GLA's response, for the objection to the de-designation of the land to the south of the DLR depot at Beckton Riverside. TfL will require this land for the expansion of the DLR Depot and therefore the site should remain as SIL. Newham Council will be aware of ongoing liaison with TfL regarding the DLR depot expansion and land requirement to enable this.

For the Local Plan document there are several suggestions for non-material minor wording changes and updates to maps and figures, as set out in the tables below. Comments made should also be taken to refer to updates required to the relevant Strategic Site and mapping documents.

For the Infrastructure Delivery Plan there are other observations also in the table below reflecting the latest status and expected sources of funding for projects, especially in the Royal Docks Enterprise Zone. While TfL and its franchisees do provide the majority of public transport services, it should be noted that the responsibility for infrastructure at National Rail / Elizabeth line stations and line infrastructure rests with Network Rail.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

Tim Neale  
**Principal Planner**  
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Direct line: 020 3054 7036

Cc: Celeste Giusti (GLA)



## Proposed Submission November 2017

Page	Paragraph	Comment	Text change
All		Crossrail project will be mostly complete by the time this is published	Any references to Crossrail should be replaced by the Elizabeth line instead.
8		DLR Royal Docks southern branch currently shown as terminating at King George V	Amend map: Extend DLR line to show cross river connection to Woolwich Arsenal (consistent with other DLR lines on the diagram)
		Diagram should show Elizabeth line through Royal Docks and Jubilee line from Canning Town across river	Amend map: Add Elizabeth line to diagram
13		Key Diagram – Proposed Transport Link	Amend map: “Improved connectivity” link across Roding can be retained (as it doesn’t specify mode) Also show connectivity with new arrows Beckton Riverside towards Thamemead Beckton Riverside towards Barking town centre.
		Stratford and West Ham	
26	g	Jubilee line engineering depots	Amend text to: “the Jubilee line <del>engineering depots</del> (which also includes an educational and training facility)..”
26	h	Refs to access (ie entrances) and Plaistow station for stronger refs to interventions and delivery.	Amend text to: “Public transport access will be further enhanced, with significant improvements to <u>access and interchange capacity</u> in and around Stratford <del>and</del> , West Ham <del>and Plaistow s</del> Stations, and the development of new and improved services along the associated rail, tube, DLR and bus corridors;”
29	5.16	No further DLR extensions planned, but double tracking etc of Pudding Mill route, so refer to enhancements, not extensions.	Amend text to: “The area is subject to major infrastructure investment including key transport projects such as Stratford International Station, Crossrail, and DLR <u>enhancements</u> <del>extensions</del> .”
31	5.21	“New river crossings over the River Lea to Tower Hamlets will provide the links that will finally overcome the major	Final wording could be amended.

		barriers that have separated the borough from the rest of London for almost two centuries.”	
		Royal Docks	
39 and 43	e & 5.38	Wharf consolidations	See GLA comments
41		Thames Wharf DLR station safeguarding	Amend map: This isn’t marked in the right place – it would be on the straight section of track slightly further north west
43	5.36	reactivating wharf	Amend text to: “reactivating wharves”
		Canning Town Custom House	
53		Map: “New DLR station safeguarding”	Amend map: This isn’t marked in the right place – it would be on the straight section of track slightly further north west
		Beckton	
63	g	Add text to reflect cross-Thames connections.	Amend text to: “...connect with neighbouring communities and employment in Barking and Dagenham, East Ham and the Royal Docks, and across the River Thames.”
65		Map: Should show potential DLR connections and retained SIL for depot expansion	Amend map: SIL between the DLR depot and the sites further south needs to be retained for expansion. Dotted arrow for DLR extension to north should be edited to point towards Barking town centre rather than Barking Riverside.
	5.58a	The text refers to the need to expand the DLR depot, which is welcomed, amongst other emerging proposals. As per GLA response, land for the expansion of the DLR depot should remain as SIL.	
74		Plaistow – Need to check for any duplication / repetition in in Stratford section earlier	
136	6.67	Add in Healthy Streets reference, as per draft London	Amend text to: “The arterial corridors are also important

		Plan and draft Mayor's Transport Strategy	movement routes, for pedestrian, cycle and motor traffic including buses supporting the achievement of good growth and <u>Healthy Streets</u> ."
179		Map – Wharves. The GLA is undertaking a review of all safeguarded wharf sites in London at present and this should be reflected in the draft Local Plan Review.	
274	Rail ii	Stratford and Stratford International are separate stations.	Amend text to: "International trains calling at Stratford <u>International</u> station and / or, depending on capacity, linkages from Stratford <del>(T2) International</del> to the proposed possible Crossrail 2 High Speed 2 and Chelsea Hackney railways;"
274-6	vi	DLR – include new text and check for any duplication of references to extensions.	Amend text to: "Further <del>extensions</del> <u>enhancements</u> to the DLR network including to Barking and Thamesmead, and new stations at Beckton Riverside and Thames Wharf (T6) and station enhancements notably at Pontoon Dock, Gallions Reach
359	S10	"Site access improvements will be required including a link to West Ham Station." "Site access improvements will be required including a link to West Ham Station and facilitation of a possible future link to S11 Parcellforce."	Duplication of text. Makes sense to include ref to West Ham station and S11 site.
360	S29	"On the triangle site to the west of Plaistow Road, a mix of residential accommodation, open space with connections to the Greenway"	Amend map: Add connection arrow to map
361	S21	Amend reference to DLR corridor, which isn't inside this Strategic Site boundary – There are restrictions on what can be used in DLR viaduct space.	Amend text to: "focused around North Woolwich Road <u>corridor</u> , <del>including use of space under the DLR viaduct.</del> "
363	S09	Silvertown Landing Note that the plan that is shown doesn't take account of Silvertown Tunnel safeguarded	

		and, if granted, the realignment of Dock Road.	
368	S08	Could show safeguarded DLR station location	Amend map: Add safeguarded DLR station location
380	S19	Albert Basin	Amend map: "...and from the DLR station ( <u>which requires platform lengthening and capacity upgrade</u> )"
382	S01	Beckton Riverside	As per other text, for retention of SIL to the south of Beckton depot for expansion of DLR depot.

## Infrastructure Delivery Plan (dated November 2017)

Page	Project	Comment	Text change
All		Crossrail project will be mostly complete by the time this is published	Any references to Crossrail should be replaced by the Elizabeth line instead.
7		London City Airport are also collating a compelling case	Amend text: Remove the word “compelling” which suggests some pre-empting of the case.
7		List of stations	Amend text: “Custom House” as two words
8		DLR stations are already step-free throughout.	Amend text: “Improvements to ensure step free access onto trains along the whole platform are underway and all DLR stations have step-free access to platform level.”
10	Custom House station		Amend project title to: “Custom House station and public realm improvements”. Amend timing to “2021 – 2025” Our estimated cost is £5m.
10	DLR Royal Docks / Beckton upgrades	Can separate out individual stations for ease of reference and clarity for seeking contributions. Updated outturn costs and details of where there is already S106 or S156 agreements or future LEAP funding being sought.	Custom House DLR Station Upgrade £15.8m outturn (£6.1m S156) Royal Victoria Canopy Extensions £1.9m outturn (LEAP) Beckton Park Station Upgrade £4.7m outturn (All S156) Pontoon Dock Station Upgrade £13.4m outturn (£4.6m S156 + LEAP) Pontoon Dock S106 Footbridge £2.1m outturn (All S106) Gallions Reach Platform Extensions £8.2m outturn (LEAP) Royal Albert Station Upgrade £20.4m outturn (LEAP) Canning Town Wayfinding + Second Lift £5.0m outturn (LEAP) Thames Wharf New Station £29.8m outturn (LEAP)
11			Amend text to: DLR rolling stock replacement (with full length 3-car, walk through trains) and additions
12 & 13		Note the October 2017 announcement of a pause to the Jubilee and Northern lines World Class Capacity programme – timing may fall back.	
12		DLR tph	Amend text to: “and aspirational target for 30tph on each DLR branch on the DLR. 15tph on DLR branches to Beckton and Woolwich “

## Annex 2

### Diagram 1 - Mayor's required SIL boundary at Silvertown Landing/Thames side West

