Dear Mr Kemp,

Matter 12 – Response to LB Newham Written Note concerning Strategic Site S04 and the adjoining Standard Industrial Estate

On behalf of our client Rockwell we wish to respond to the written note submitted by London Borough of Newham to the Planning Inspectorate on 29th July 2018 in respect of the Strategic Site S04 (North Woolwich Gateway) and the adjoining Standard Industrial Estate. This note has been helpfully provided to the Inspector by LB Newham following the discussions and arguments put forward for these lands by Rolfe Judd Planning at the Examination in Public of the draft Local Plan.

The Council have confirmed in their note that following further consideration they continue to maintain that it is not appropriate to include the Standard Industrial Estate within Strategic Site S04 and that the boundary for this allocation should remain as proposed. The note confirms that this decision is based primarily on concerns relating to connectivity/accessibility, impact of redevelopment on existing SIL functions and question marks over deliverability. For the benefit of the Inspector we seek to respond to each of these points from our client’s perspective.

Connectivity/Accessibility

We appreciate the Council’s acknowledgment in their note that the new ‘cut and cover’ Crossrail works to the immediate north of the Standard Industrial Estate will include a new publically accessible pedestrian access between Albert Road and Factory Road. We agree that this will assist in addressing the severance previously imposed by the above ground North London line tracks and will greatly improve the connectivity to existing residential areas and the public transport and local facilities 10 minutes’ walk to the north east at King George V DLR station.

We recognise that the new pedestrian connection in itself will not notably increase the PTAL of the area. However, we do feel that the Council has not taken account of other improvements planned for the area which would significantly improve accessibility to the Standard Industrial Estate.

As set out in our January 2018 representation on the Proposed Submission Local Plan one of the implications of the new Crossrail station at Custom House 2km to the north west is the reconfiguration and increase in bus routes and connections in the area that is being worked up by TfL at present. This will provide improved bus connections from the site for either direct routes to...
destinations or interconnection with Crossrail services at Custom House.

The approval of the Silvertown Tunnel in May 2018 now means that there will be a major new connection between the Royal Docks and the Greenwich Peninsula. As part of the overall business case for the Silvertown Tunnel, this approved scheme includes additional bus connections through the Silvertown Tunnel with one of these connections including a route between North Woolwich and Greenwich. This would further improve the public transport connectivity of the area and a wider range of destinations available.

As a result of the improvements to permeability, and taking account of future additional bus service alterations and provisions, the Public transport Accessibility Level (PTAL) has been estimated by our transport consultants Transport Planning Practice (TPP) to increase significantly over the short to medium term to a PTAL of 3.

The promotion though planning policy of further strategic regeneration, such as what is illustrated in our representations within an expanded Strategic Site S04, would capitalise on this growing accessibility and would in turn generate increased critical mass to justify further investment. This could include a potential future Crossrail station directly in front of the site which has been investigated by TfL as a potential option.

Such an approach has already been successfully applied by the Council in other parts of the Royal Docks such as the Royal Wharf development, where the emergence of strategic development has facilitated the delivery of new bus routes and increased DLR capacity.

Impact on SIL integrity/functioning

The consultants representing Rockwell and CBRE Global Investors have argued in various representations on the emerging Local Plan to-date that the SIL lands at the Standard Industrial Estate are under-performing in terms of their potential economic function due to a mix of vacant and under used properties and a number of non-industrial uses.

Evidence submitted during our representations, which has included an Economic Study prepared by GVA (see attached for ease of reference), suggests that the Standard Industrial Estate does not meet the needs of modern SIL users and that a different approach to development on the site that is supported by site-specific policies would help to meet borough-wide objectives. Indeed this has been acknowledged by the Council in their Employment Land Review (February 2017) of the Standard Industrial Estate when it states that:

“given vacant and underutilised land, and non-confirming SIL uses, its relative proximity to local facilities, neighbouring residential site allocation (in the DSPDPD) and investor interest there may be scope for industrial release to allow for mixed use redevelopment (reflecting the need to buffer remaining SIL) at the eastern end as part of a wider strategic site.”

Notwithstanding this identified opportunity within the evidence base for potential SIL intensification at the Standard Industrial Estate the 29th June 2018 written note from the Council presents a different perspective. Although the note acknowledges that Managed Intensification could take place at Site C (0.44 hectares), given its present TV studio/D1 use and limited requirement for yard space, the remainder of the estate (Sites A and B) is seen as well functioning and that this function would be considerably disrupted by comprehensive re-development. It is therefore considered relevant to
assess in more detail each of these two sites below.

The existing metal recycling facility on the 1.22 hectare Site A is referenced by the Council in their note as an important contributor to the local and wider economy which may be lost in the event that these lands are considered for intensification. It is our client’s view that too much emphasis and importance has been placed on this existing temporary use. The site has historically been used for a variety of industrial uses with the scrap metal recycling facility only occupying the site since February 2010 on a short term lease at sub-market rental levels. It is unlikely the business could operate viably if it were charged full rent, and would most likely have to relocate to a cheaper location.

It is therefore considered that this largely open air temporary activity, which has a significant visual impact on the area and generates very low levels of employment, could be replaced with a more appropriate and intensified development that still retained the site’s industrial function.

It is acknowledged that Site B (also 1.22 hectares in size) currently accommodates modern industrial units (3,600 sq. m) and yard space. Although 6 of the 22 units on the site are currently vacant the remainder of the units are occupied by wholesale and retailers as well as storage companies, taxi companies, car repair and other small light industrial uses. As identified in the GVA employment study for the site it is estimated that these units employ c. 129 employees which is a low intensity of employment activity given the scale of the site.

With such an extensive river frontage we believe that this site is currently underutilised and ideally situated to benefit from Managed Intensification. The initial masterplan study undertaken by Simpson Haugh Architects and DRMM Architects within our representations confirms that the existing uses and functions, including their associated yard space, can be effectively accommodated within a co-location redevelopment scheme.

It is inevitable that some temporary disruption to current tenant operations would occur as a result of comprehensive redevelopment. However, though Managed Intensification across the wider Standard Industrial Estate this disruption could be minimised through appropriate phasing with new development retaining and enhancing the current industrial offer on the site in the long term whilst potentially opening up the site to the opportunity for other uses (subject to demonstrating this to the Council’s satisfaction through masterplanning work).

The Council’s decision to only include the SIL lands at Sites D and E (the TfL Crossrail site and BT Teleport site respectively) within the North Woolwich Gateway Site Allocation is in our view a flawed approach. The currently proposed wording for Strategic Site 04 within the draft Local Plan only allows for SIL compatible uses on these two cleared sites. As these two sites are already designated as SIL, their inclusion within Strategic Site S04 under these restrictions is effectively a fait accompli with Managed Intensification to yield further SIL capacity already achievable under the currently adopted Local Development Framework.

In our view there is no added incentive to the owners of Sites D and E to interact with other landowners within the allocation as part of a wider masterplan approach for regeneration. We have therefore contended within our representations that Strategic Site 04 should instead establish a more positive rationale for including these SIL lands within the Site Allocation by allowing for Managed Intensification, with scope for release should this occur.
However, as acknowledged by the Council, the application of this approach would only truly succeed when it is applied on a comprehensive basis. It is for this reason that we believe that a more effective approach to achieving the Council’s objectives could be applied. The extension of Strategic Site 04 (North Woolwich Gateway) to include the remainder of the SIL at Standard Industrial Estate would allow for more generous space to implement a successful transition strategy from industrial intensification (with no net loss of industrial integrity or function) to new residential, community and cultural uses across the wider allocation.

The initial high level masterplan studies undertaken by Simpson Haugh Architects and dRMM Architects illustrate how this expanded approach could be achieved. These show that the inclusion of the Factory Road lands would enable the delivery of up to 30,000 sq. m of industrial floorspace alongside more than 1,000 new homes. The masterplan presents a sensible distribution of uses, building typologies and spaces along with major improvements to public realm, open space and permeability.

The Local Plan Options Appraisal (Page 93-94) recognises that a strategic site allocation could be a catalyst for transformative regeneration in this area. However, we believe the current Site Allocation boundary represents an overly conservative approach and a significant missed opportunity to regenerate underused employment land through proactive management of SIL and create a genuinely mixed use new urban quarter at a strategic scale.

**Deliverability**

We agree entirely with the Council’s view that the acceptability of release via Managed Intensification in terms of residential quality as well as the ability to meet Managed Intensification criteria (Policy J2:3b) would depend on this occurring on a comprehensive basis. As our representations have argued, as well as those from CBRE on behalf of their client’s landholding, there is a clear opportunity for SIL consolidation at the Standard Industrial Estate, which the evidence base for the Local Plan does not appropriately consider or explore.

The Council have cited the existence of 5 different freehold landownerships on the Standard Industrial Estate and the requirement for co-ordination between these different parties as a reason for questioning the deliverability of these lands through Managed Intensification. It is stated within the Council’s note that there is no evidence to suggest that co-ordination between landowners can be achieved. This is a surprising statement given that the Council have already acknowledged in their supporting Employment Land Review for the Local Plan that there is clear investor interest in the redevelopment of the Standard Industrial Estate.

There have also been comprehensive and co-ordinated representations at all stages of consultation on the Local Plan made by consultants on behalf of Rockwell and CBRE Global Investors for two of the larger land ownerships within this area (i.e. Sites A and B). Both landowners have been liaising on a regular basis and have found strong mutual agreement on the potential that exists for working in a co-ordinated manner on the redevelopment of their landholdings. In addition, Rockwell has been holding lengthy discussions with the owners of the Loveworld TV studio warehouse site (Site C) about the potential acquisition of that property which would further reduce the number of land ownerships.

As TfL have submitted representations on the Local Plan, and will shortly have a redevelopment site available to them following the completion of the Crossrail works, they are in a well-timed position to
co-ordinate with adjoining landowners regarding the redevelopment potential of their lands (i.e. Site D) as part of a wider masterplan. It would equally be of similar benefit to BT to engage in such a process for Site E, even if the southern part of the site comes forward as their newly approved engineering facility.

In cases of large-scale regeneration and comprehensive redevelopment the requirement for co-ordination between landowners is not an usual requirement. The inclusion of separately owned lands within a site allocation generates an incentive to co-operate. Rockwell (Site A), CBRE (Site B) and the owners of Loveworld (Site C) have all responded favourably to the potential for a more comprehensive scale of development to be achieved within a co-ordinated masterplan for the entire Standard Industrial Estate within an expanded Site S04 boundary. This would also enhance the development opportunities available to TfL (Site D) and BT (Site E) when compared to the limited scope of what could be achieved under the current draft allocation.

Given that discussions to-date have identified a clear desire to pursue the regeneration of these lands through a co-ordinated masterplan at Standard Industrial Estate there are not considered to be major concerns about deliverability in the short to medium term.

The Council make reference in their note to the February 2018 approval (Council ref: 17/03449/FUL) of a new engineering centre for BT on the southern part of their land (Site E). As this permission is showing signs of being implemented by BT the Council feel that this would act as a physical impediment to the effective delivery of a strategy for Managed Intensification and potential release given its central position on the river front. The Council have also referenced that the operational needs of the newly approved facility would be fettered by on-site residential and that the scheme has been designed on the assumption that the SIL to the west and north will be maintained.

However, having now reviewed the planning permission it would appear highly feasible that a co-location scheme could still be developed around the BT facility, applying the principles of Agent of Change without any undue impact on the operational requirements of this facility or the amenity of new residents. As you can see from the approved ground floor plan (see enclosed for ease of reference) all of the activities associated with the facility will be undertaken internally within the new development (with the exception of a minor level of traffic movement). Should the BT facility be delivered it would be entirely compatible with new, well designed mixed use development in the surrounding area that includes land to the east that is already identified for housing development.

**Proposed Amendment to Strategic Site 04**

As set out at the Hearing, to realise the vision that we have set out within our representations and capitalise on landowner enthusiasm we would request that the following amendments to the draft plan be considered:

1) An update to proposed Policy J2 (b) to reference North Woolwich Gateway alongside Canning Town Riverside, Beckton Riverside and Silvertown Landing as one of the sites where there is scope for some limited further release through intensification of SIL uses;

2) An extension of the North Woolwich Gateway boundary further west to include the SIL at Standard Industrial Estate; and
3) An update to the supporting text for Strategic Site S04 to allow for Managed Intensification to be considered (without losing industrial capacity) on the SIL land within the allocation as part of a comprehensive masterplan.

The Royal Docks Policy S3 notes that the Local Plan needs to assist in bringing forward development opportunities in the area and that this is best achieved through a “managed and co-ordinated way to maximise the long-term benefits, acknowledging the opportunities for transformational regeneration, with potential to make a significant contribution to the borough’s objectives for providing new homes, jobs and services in line with the agreed vision for the future role of the Royal Docks.” It is on this basis that we believe that Strategic Sites such as North Woolwich Gateway have much greater potential to deliver on key Local Plan objectives through an extension to include the SIL land at Standard Industrial Estate and apply a more flexible approach to intensification of SIL land.

Yours sincerely

Philip Dunphy

For and on behalf of
Rolfe Judd Planning Limited

Cc Jonathan Manns – Rockwell
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