NEWHAM LOCAL PLAN REVIEW
EXAMINATION

On behalf of CBRE Global Investors

Hearing Statement: Matter 1
Examination Questions: 1.2

June 2018
1.0 Matter 1

MATTER 1: LEGAL REQUIREMENTS, SCOPE OF THE PLAN & DUTY TO COOPERATE

1.1 CBRE Limited (CBRE) is instructed by CBRE Global Investors to address the Examining Inspector’s questions from the perspective of our client’s property interests at Standard Industrial Estate, Silvertown E16 2ES.

1.2 We refer the Inspector to the representations made on behalf of our client responding to Proposed Submission consultation1.

1.3 CBRE has prepared hearing statements in respect of four Matters (Matters 1, 3, 5 and 6).

1.4 This Statement responds to the Inspector’s Question 1.2.

Question 1.2 Scope of Plan

Scope of the Plan: Does the scope of the Plan accord with the strategy, objectives and policies of the London Plan? What account, if any, should the Plan give to the emerging Draft London Plan, especially in view of the Mayor of London’s comments that any policies that diverge from the Draft London Plan will become out-of-date as the Draft London Plan gains more weight as it moves towards publication?

1.5 We do not consider that the draft Local Plan in its current form to accord with the Draft London Plan. It is considered that weight should be attributed to the emerging policies given that the London Plan is expected to be examined later in the year and therefore the timescales for both documents are broadly aligned.

1.6 It is our considered view that the draft Local Plan is not consistent with meeting identified housing needs and the approach to industrial innovation and SIL consolidation.

Housing Need

1.7 The target housing delivery numbers set out in the Proposed Submission (2,867/year as an annualised figure) are significantly lower than those set out within the Draft London Plan (3,850/year), and also much lower than those which would be applied using the Government’s proposed housing needs methodology (3,840/year).

1.8 The Royal Docks and Beckton Riverside OA is also expected to deliver 30,000 homes in the Draft London Plan, which represents 19,000 more than the adopted London Plan. There is therefore a clear need for both high density residential/mixed use development which is not fully planned for.

1.9 By not planning for the most up to date assessment of housing need, the Proposed Submission cannot be considered to be ‘positively prepared’ in the context of the NPPF. It is also not aligned with the Draft London Plan’s growth strategy for the Opportunity Area.

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1 CBRE representations to the London Borough of Newham’s Local Plan Review: Proposed Submission (January 2018)
**Suggested Modification**

The target housing delivery numbers set out in the Proposed Submission (2,867/year) should be revised in line with the Draft London Plan figures (3,850/year), and/or the Government’s proposed housing needs methodology (3,840/year).

**Industrial Innovation and SIL consolidation**

1.10 Demand for housing in the Borough has increased significantly in recent years and is expected to continue during the plan period.

1.11 At a borough level, the draft London Plan (2017) identifies how industrial capacity should be managed by attributing one of the three categorisations: ‘provide capacity’, ‘retain capacity’ or ‘limited release’. The London Borough of Newham is one of only three boroughs identified for ‘limited release’ of industrial capacity. These boroughs are all located within the Thames Gateway, which the London Industrial Land Demand Report (2017) demonstrates is London’s weakest industrial market area, and where industrial land vacancy rates are currently well above the London.

1.12 As such, there is scope for ‘limited release’ of industrial land in SIL and/or LSIS designated sites within the London Borough of Newham, and this should be achieved through a planned approach to new development. This is proposed to help strengthen this industrial market and to support the re-use of surplus land and floorspace for other uses.

1.13 Notwithstanding the above, the draft Local Plan fails to sufficiently consider the direction of the Draft London Plan with regards to managing industrial capacity and neither does it plan for the Site and wider North Woolwich Gateway area in a manner consistent with Newham’s local and strategic objectives which, amongst other things, seek to regenerate this part of the riverside and better integrate this location with the wider North Woolwich area.

1.14 As noted in our hearing statement for Matter 5, the Draft Local Plan proposes limited release of SIL in some locations along the riverside, however we believe that a clear opportunity for proactive SIL consolidation at our Client’s Site and surrounding area has been missed. The evidence base confirms that there are clear opportunities for SIL consolidation at the Standard Industrial Estate, which the Draft Local Plan does not appropriately consider and explore.