Newham Local Plan Review - Examination in Public  
(June 2018)  

STATEMENT OF CASE  

Matter 12 - Spatial Policies and Sites  

Prepared on behalf of Silvertown Homes Limited  

(Participant Number: 25)  

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1.0 INTRODUCTION

1.1 This Statement of Case (SOC) has been prepared on behalf of Silvertown Homes Limited ("SHL") in order to set out their case to be presented at the London Borough of Newham’s ("LBN") Local Plan Review Examination in Public ("Local Plan EiP").

1.2 It is one of five SOCs prepared by SHL to be discussed at the Local Plan EiP. This SOC specifically focuses on Topic Matter 12 – Spatial Policies and Sites.

1.3 The representations previously submitted by SHL to LBN as part of the Regulation 18 and 19 consultation responses to the draft Local Plan Review are attached at Appendix 1.

Background

1.4 SHL and the Greater London Authority Land and Property (GLAP) own the majority of the land referred to in the draft Local Plan as:

- S08 - Thames Wharf; and

- S09 - Silvertown Landing

1.5 Diagrams 1 and 2, below, illustrate the extent of these two sites that are located alongside each other and are located at LBN’s western boundary with the Royal Borough of Greenwich (RBG) and London Borough of Tower Hamlets (LBTH). The combination of these two sites will be referred to hereafter as the “Combined Site”.

Diagram 1 – S08

Diagram 2 – S09
1.6 Following the completion of the Silvertown Tunnel works (which was allowed by the Secretary of State on 10th May 2018) and the delivery of a new Docklands Light Rail (DLR) station on the Thameside West site, which are both programmed to constructed on the Combined Site between 2020 and 2024, the Combined Site will be available for the construction of new mixed-use riverside development.

1.7 SHL and its joint venture partner, GLAP, continue to undertake pre-application discussions with LBN and the Greater London Authority’s (GLA) planning decisions units during 2017 and 2018 in relation to the potential comprehensive redevelopment of the Combined Site for the following purposes:

- **S08 - Thames Wharf** = residential-led, mixed use purposes comprising a 4FE primary school and community facility, retail floorspace, office floorspace, other flexible use floorspace (Classes A1 to A3, D1 and B1) with associated open spaces; and

- **S09 - Silvertown Landing** = a new four-acre park with two formers of the development either side. Development on the eastern side of the new park will focus on delivering an industrial quarter (Class B1, B2 and B8 uses) with residential on the upper floors via a “co-location” proposal. Development on the western side of the new park will focus on delivering a residential-led, mixed use to knit into the development proposed on the Thames Wharf site.

1.8 The comprehensive masterplan proposals also include a new river wall / flood defence wall, riverside walkway and biodiversity enhancements that cross both parts of the Combined Site.

1.9 The contents of the LBN’s Draft Local Plan will have a direct impact on the development potential of the Combined Site, hence why SHL wish to participate in the EiP Hearing Sessions.
2.0 SILVERTOWN HOMES LIMITED’S CASE

2.1 This section of this document sets out the Inspector’s questions in relation to Matter 12, followed by SHL’s response.

**Matter 12.1 Policies Map**

2.2 Do the site allocation policies pay adequate regard to the site context, including for example the need to maximise housing densities at transport hubs, and the need to enhance or maintain the character and appearance of Conservation Areas?

**SHL’s Response**

2.3 SHL does not question the soundness of Site Allocations S08 and S09. It is concerned about the inflexibility of these allocations and, therefore, their restrictive nature that does not allow the full potential of these accessible and sustainable sites to maximise housing densities, particularly in regard to proposed land uses and physical context of the site.

**Proposed Uses**

2.4 SHL support the principle of mixed use development on Site Allocation S08 (Thames Wharf). On the basis that this site will benefit from a future new DLR station, close proximity to other public transport nodes (Silvertown East DLR Station; Custom House DLR Station and Crossrail Station); Emirates Cable Car; riverside frontage, it makes perfect sense to promote this highly accessible and sustainable site for residential-led mixed uses purposes, including a new local centre.

2.5 SHL also supports the principle of removing the western part of Site Allocation S09 (Silvertown Landing) from its current Strategic Industrial Land (SIL) designation to mixed use development area that will act as a “transition” between the retained SIL and the new mixed-use development that will be constructed on Site S08. However, we consider that the east part of Site S09 should also be designated as a mixed-use development “transition” area, rather than being retained as SIL only. SHL’s justification for this is set out below.

2.6 The Inspector will be aware that the Silvertown Tunnel Development Consent Order (DCO) was allowed by the Secretary of Statement (SoS) on 10th May 2018. Not only will the construction of this major infrastructure project result in the removal of the occupiers of the majority of the Thames Wharf and Silvertown Landing sites, it will mean that no development
will be able to be constructed above the tunnel. This will mean that as part of SHL’s future proposals for the Silvertown Landing site there will be a new 4-acre park that will be constructed through this site which will not only provide amenity provision for the future occupiers of the Combined Site, it will provide a publicly accessible park for the wider community and visitors to this part of East London. The setting of this park is extremely important.

2.7 Site Allocation S09 (Silvertown Landing) is currently written by LBN to allow for industrial intensification in order to release employment land for mixed use purposes. SHL consider this can be achieved as part of its current proposals, however, the current Site Allocation S09 is not flexible enough as it is currently written.

2.8 Paragraphs 21 and 157 of the National Planning Policy Framework (NPPF) explains that Local Plan’s should allocate sites to promote development and flexible use of land [our emphasis]. Paragraph 21 of the NPPF explains that policies should:

- be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

2.9 In this case, SHL does not consider the partial retention of SIL on Site Allocation S09 is “flexible” enough to accommodate the changing needs to accommodate new industrial typologies and co-location proposals, as explained in greater detail below.

2.10 SHL’s concern is that as a result of the in-flexibility of Site Allocation S09, the east part of the Silvertown Land site’s SIL retention designation (rather than a transition area designation) will result in the east part of this site and the setting of the new park being characterised by industrial buildings.

2.11 Set out in Diagram 3, overleaf, is an illustration of SHL’s proposals for the Combined Site with LBN’s retained SIL land area shown in the red box. This demonstrates that the east side of the park and the river frontage will be dominated by in active industrial frontage.
Diagram 3

Area for retained SIL Land
2.12 It would also result in a missed opportunity to deliver homes (as part of a “co-location” solution) for the Silvertown Landing site as Officers will adopt a rigid application of SIL policy which will not normally support the provision of residential floorspace in SIL areas.

2.13 SHL consider the solution is to adjust Site Allocation 09 to refer to the potential for “co-location” across all of the Silvertown Landing site. This would mean removing the partial SIL retention entirely from this site and drawing a new SIL boundary along its eastern boundary, shared with Nuplex, as illustrated in Diagram 4 overleaf.
2.14 This adjustment would result in the delivery of large-scale flexible industrial units (8 metres high) at ground floor with adequate servicing arrangements, on top of which would be a residential zone that is protected from vibration, noise and air pollution via a vertical transition zone (of ancillary communal spaces and air handling), as illustrated in diagrams 5 and 6 below:

Diagram 5

Diagram 6
2.15 This co-location approach to development is actively being encouraged by the GLA on the basis that it has the potential to not only allow older industrial units to be demolished and replaced by fit-for-purpose modern flexible industrial units, it will also untap the potential of previously single use, low-density site to be used to deliver much needed homes in London. The key to approach is to ensure that the industrial and residential uses can live in harmony with each other in terms of access and servicing arrangements and the living environment. SHL believe this can be achieved in an unfettered way that will result in market demand for the industrial units and homes.

Massing

2.16 Site Allocations S08 and S09 include indicative heights guideline. SHL consider that this matter should not be prescriptive in the Local Plan Review. This should be led by design and master-planning objectives, promoted by the architect and the evidence prepared in support of any proposal (including a Townscape & Visual Impact Assessment and Design & Access Statement).

2.17 SHL acknowledge that Paragraph 157 of the National Planning Policy Framework (NPPF) explains that Local Plan’s should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate. In this case, SHL does not consider it is “appropriate” to provide an indicative height estimate in view of the character and context of the Wider Site.

2.18 Should the Inspector still consider it is acceptable to have an indicative height estimate, SHL consider that the indicative heights set out in Site Allocation S08 and S09 are set too low. Evidence on this matter was issued to LBN as part of SHL’s previous representations which is included in Appendix 2. As a consequence, the development on the Combined Site will not make the best use of this accessible, sustainable and previously developed site (contrary to paragraph 17 of the NPPF) which is surrounded by existing and future developments that will deliver taller buildings and higher-density character area.

2.19 Notwithstanding the technical constraints (such as London City Airport PSZ and OLS) which future designers will fully respect in the design evolution, it is considered that there is significant scope to promote height, given its riverside location, where landmark buildings are expected, its close proximity to sustainable transport options and in the context of other tall buildings in the area. Examples of consented/promoted height in the area include:
LB Newham:

- The Hoola Buildings - 23 to 24 storeys;
- Stephenson Street - 34 storeys;
- Western Gateway - 20 storeys;
- Brunel Street Works - 26 storeys;
- Pontoon Dock - 15 storeys;
- Deanston Wharf - 19-storeys; and
- Royal Wharf - 16 storeys.

Royal Borough of Greenwich:

- Greenwich Peninsula Central East - 30 storeys;
- Greenwich Peninsula (South of O2) - 40 Storeys; and
- Other various sites on the Greenwich Peninsula - up to 36 storeys.

London Borough Tower Hamlets:

- Blackwall Reach - 40 storeys;
- Leamouth Peninsula North - 25 storeys;
- Leamouth Peninsula South (Good Luck Hope) - 30 storeys;
- Orchard Wharf - 24 storeys;
- Wood Wharf - 60 storeys; and
- Meridian Gate - 53 storeys.

2.20 Diagram 7, overleaf, highlights the close proximity of the Combined Site to the abovementioned schemes.
2.21 In light of the land use and massing discussions above, SHL seeks that Site Allocations S08 and S09 are amended as follows [Purple highlighted text are SHL’s amendments. All other amendments are proposed by LBN]:

**Site Allocation S08 – Thames Wharf**

**Proposed** release from Strategic Industrial Location (see Policy J2).

There is scope to reconfigure and consolidate the safeguarded wharf at Central Thameside West (Royal Primrose Wharf) and on the adjacent site (Carlsberg-Tetley) or subsequently to remove the wharf safeguarding at Thames Wharf if a consolidated wharf can be delivered at Thameside West, subject to there being no net loss of functionality or wharf capacity. If it can be demonstrated that either scheme can be delivered, this Managed Release from SIL (see Policy J2) could provide the opportunity to develop a new neighbourhood, comprising new residential and community uses including a school, and employment, leisure/tourism and residential uses grouped around a potential new DLR station and Local Centre, well connected by pedestrian and cycle links. Where passive provision is in place, subject to addressing the constraints on the site, including the Silvertown Crossing safeguarding area, and the removal of the wharf safeguarding by the Secretary of State. Continuous riverside access; links to the Lea River Park and across to Trinity Buoy Wharf, to Royal Victoria and West Silvertown DLR stations and Canning Town centre; North Woolwich Road active street improvements; and appropriate connectivity and integration with adjacent Silvertown Landing strategic site will be secured. Indicative residential typology — medium density, medium family. Building heights of 6 to 8, 10 to 12 storeys with buildings of up to 15-18 storeys at key locations.

The Council will work together with other public sector agencies and developers to further investigate proposals for relocating or consolidating the four individual safeguarded wharves at Thameside West, to facilitate a more efficient use of land, and support the growing neighbourhood at Silvertown. See Policies INF1 and J2 for details.

See also Policies S1, S3, S4, SP4, SP6, SP7, SP9, J2, INF1, INF2, INF3, INF4, INF5, INF6, INF7, and INF8 and INF9.

**Site Allocation S09 – Silvertown Landing**

Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL, and employment/strategic infrastructure development at the east of the site, where the functionality and capacity of the SIL will be protected but may be re-positioned to best effect securing buffering of both new and existing SIL and strategic infrastructure consolidation and strengthening of the SIL on the eastern side of the site and beyond through continued SIL protection, together with strategic infrastructure. Employment uses on the SIL should include modern industrial and warehousing, but may also link to the adjacent LMUA, with the scope to secure Managed Intensification (as per J2) and further release if new formats are realised, reducing the spatial footprint whilst achieving the same capacity, functionality and ability to respond to industrial and warehousing demand. The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL and strategic infrastructure and include residential uses, green and community infrastructure meeting local need, and employment generating uses. Convenient and comfortable connections to the DLR stations at
West Silvertown, Thames Wharf and Royal Victoria, and along and across North Woolwich Road will be improved as will pedestrian and cycle links through to and along the river (where public space will open out) and docks and to nearby local centres and Canning Town town centre. Indicative building heights 6 to 8 10 to 12 storeys with buildings of up to 15 18 storeys being acceptable at key locations ensuring that views of and the pre-eminence of the distinctive Marco Polo building at Royal Wharf are protected.

See also Policies INF4, INF6, INF7, and INF8 and INF9.

2.22 Should the Inspector still consider it is acceptable to have an indicative heights estimate, SHL consider that the indicative heights set out in Site Allocation S08 and S09 should be described as follows underlined text is SHL’s amendments):

“Indicative building heights 10 to 12 15 to 20 storeys with clusters of buildings of up to 18 30 storeys being acceptable at key locations”.

Matter 12.2 Other Soundness Issues

2.23 Are there any other soundness issues relating to specific sites in Newham?

SHL’s Response

2.24 SHL does not wish to make a comment on this matter.

End
APPENDIX 1

SHL’S REPRESENTATIONS
Dear Sir or Madam,

**LOCAL PLAN REVIEW: PROPOSED SUBMISSION CONSULTATION (NOVEMBER 2017) RESPONSE ON BEHALF OF SILVERTOWN HOMES LTD**

These representations have been prepared on behalf of Silvertown Homes Ltd (SHL) and set out comments in response to the Local Plan Review ‘Proposed Submission’ Consultation November 2017.

They follow previous representations made by SHL in April 2017 in relation to the ‘Issues and Options’ Consultation. These representations are included at Appendix 1. These representations included details of SHL’s interest in a circa 18ha site in the Silvertown area of Newham, its relationship with the proposed Silvertown Tunnel and the proposed ‘operational development works’ planning application for the site. This information is not repeated in these representations; however, the following update should be noted:

- A decision on the Silvertown Tunnel has been postponed until May 2018, to enable further consideration of the scheme on air quality; and

- The ‘operational development’ planning application was submitted in July 2017 (ref: 17/02554/FUL) and is still to be determined. The planning application seeks the following to facilitate the future development(s) of the site:
  - Site clearance works including vegetation removal and demolition of existing buildings, structures and hard standing.
  - Increasing the site’s ground level by utilizing spoil which would be excavated from the construction of the Silvertown Tunnel.
  - The construction of flood defence walls and delivery of ecological habitat adjacent to the River Thames.
  - Re-purposing of some of the temporary jetty piles which would be made as part of the construction of the Silvertown Tunnel.
We understand the consultation specifically seeks views on whether the proposed plan is ‘sound’ as per the tests set out in the NPPF (paragraph 182) – positively prepared, justified, effective and consistent with national policy. That is:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

These representations seek to support London Borough of Newham (LBN) in ensuring that the Draft Local Plan meets national planning policy and guidance within the context of the tests of soundness identified at paragraph 182 of the NPPF and the guidance contained in Planning Practice Guidance (PPG).

In general, SHL welcome the identification of Thames Wharf (S08) and Silvertown Landing (S09) as strategic mixed-use development sites. Both sites provide significant opportunity for future development and will continue the regeneration of the Royal Docks area. However, SHL consider that further alterations to the draft Local Plan are necessary in order to:

a) Better assist LBN in tackling the housing crisis in London;

b) Better assist LBN in tackling worklessness in the Borough and London; and

c) Ensure greater flexibility to encourage the delivery of the Local Plan objectives, rather than artificially limit/hinder housing development and job delivery in the borough in accordance with paragraphs 156 and 157 of the NPPF. It is important that the plan has enough flexibility to allow development sites to be delivered.

REPRESENTATIONS

SHL have reviewed the consultation documents and their comments are set out below.

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| S1 Spatial Strategy & Strategic Framework | o Part 1a: It is considered that proposed Strategic Sites S08 and S09 will secure this strategic principle of the Local Plan to provide “transformational change” for the borough, building a new community in the Silvertown area for people to live and work.  

 o Part 1b: Although it is acknowledged that LBN have uplifted their housing target from the ‘issues and options’ stage, when considered in the context of the new draft London Plan, they have not gone far enough. The new draft London Plan sets a 10-year housing target for Newham of 38,500 or 3,850 per year, in order to meet the need identified in their 2017 SHMA. In comparison, this policy merely seeks 43,000 new homes over 25 years (1,750 per year), which is substantially less than the London Plan (not even half) and below LBN’s current housing delivery rate (2,824 units in 2016/17)¹. It is acknowledged that the draft London Plan target is ambitious and

challenging, however it does represent the latest evidence on objectively assessed need and therefore in order for the Local Plan to be considered ‘positively prepared’ LBN should seek to aim for this target.

- **Part 1c:** LBN’s promotion of higher density mixed use development is supported.
- **Part 2a:** SHL supports the spatial concept that the focus for the greatest level of development in the Arc of Opportunity. Strategic Sites S08 and S09 will provide a significant uplift in development for this area of the Borough.
- **Part 2d:** LBN’s aspirations for a shift from traditional industrial activity on Strategic Sites towards employment uses in emerging growth sectors such as high technology and green creative industries, night time, visitor, retail, leisure and cultural economy, business and financial service is supported. This will ensure that residential and employment use can sit comfortably together in emerging mixed-use areas such as Strategic Sites S08 and S09.
- **Part 2i:** It is considered that placing a limitation on tall buildings to identified areas only is not the correct approach which will artificially limit growth and housing delivery. As per our previous representations in relation to height, we consider that the Local Plan should not be too restrictive in terms of height, which should be led by design and masterplanning objectives, promoted by the architect and the evidence prepared in support of any planning application (including a Townscape & Visual Impact Assessment and Design & Access Statement). Height should be considered on a site by site basis, with importance being placed on the context of the site within London and the Borough. Strategic Sites S08 and S09 need to respond to the London Boroughs of Tower Hamlets, Greenwich and Newham.

**S3 Royal Docks**

- **Part 1b:** The spatial strategy for the Royal Docks is supported in principle to provide a ‘high quality waterfront mixed use urban quarter’.
- **Part 2b:** It is considered that the Silvertown Landing site (Strategic Site S09) is capable of delivering at least 2,500 new homes towards the Borough’s approximate 8,404 target for the Royal Docks area, as well as employment floorspace, creating a distinct interconnected neighbourhood alongside the Thames Wharf site (Strategic Site S08). SHL also considers that in light of the new 10-year housing delivery targets for LB Newham set out in the draft London Plan (rising from 19,945 to 38,500 over a 10 period), a higher housing delivery target for the Royal Docks area should be progressed, particularly when considering the new public transport improvements being delivered in the area (e.g. Crossrail, additional DLR stations and the Silvertown Tunnel).
- **Part 2c:** A new local centre on Strategic Site S08 is welcomed.
- **Part 2e:** LBN should provide details of how sections of North Woolwich Road will be reconfigured, to help inform adjacent development sites such as the Silvertown Landing and Thames Wharf Strategic Sites.
- **Part 2f:** Consolidation of the four safeguarded wharves in the Royal Docks (Thames, Peruvian, Manhattan, and Sunshine) at Central Thameside West on Peruvian and Royal Primrose Wharves is supported. The release of Thames Wharf will boost significantly the quantum of homes and jobs which can be achieved on this Strategic Site (S08).
- **Part 2k:** The inclusion of Silvertown Landing in the list of Strategic Sites in supported.
Page 46 (Map): The identification of Silvertown Landing as a Strategic Site on this map is supported.

Page 46 (Map): The identification of the entirety of the Silvertown Landing site as an Employment Hub (J1) is unrealistic and should be adjusted for the following reason. The delivery of the Cable Car and Silvertown Tunnel Crossing will render most of this site unable to be developed above ground level for anything other than open space. LB Newham should recognise this in its Site Allocation for Silvertown Landing and, therefore, only identify the northeast part of this Site as an employment hub.

### S4 Canning Town and Custom House

- **Part 1a:** The spatial strategy for the Canning Town is supported in principle, particularly the promotion of new waterside quarters, such as the Thames Wharf site (Strategic Site S08) which the policy seeks to intensify.

- **Part 1c:** It is considered that the Thames Wharf site (Strategic Site S08) is capable of delivery at least 4,500 new homes towards the Borough’s approximate 15,608 target for the area, through its release from SIL and safeguarded wharf designations. SHL also considers that in light of the new 10-year housing delivery targets for LB Newham set out in the draft London Plan (rising from 19,945 to 38,500 over a 10 period), a higher housing delivery target for the Canning Town and Custom House area should be progressed, particularly when considering the new public transport improvements being delivered in the area.

- **Part 2c:** A new local centre is welcomed at Thames Wharf, marked by new tall buildings.

- **Part 2I:** The inclusion of Thames Wharf (S08) in the list of Strategic Sites is supported.

- **Page 53 (Map):** Following consultation with DLR, the new station safeguarding area on the Thames Wharf site (Strategic Site S08) should be moved further to the north to the straight piece of the track. It would not be appropriate to build a station on the curve as shown at present.

### SP1 Borough-wide Place-making

Please see page 82 of the Preliminary Townscape & Visual Appraisal attached at Appendix 2, prepared by Barton Willmore’s Townscape Team and Fosters + Partners.

In respect of this policy, it advises that the design cues and principles set out in this borough-wide policy should not justify limiting the full development potential of a given site. This policy should be amended to acknowledge that any development proposal should be considered on its own merits, particularly masterplan-led proposals that seek to create a new sense of place. The policy should provide flexibility so as not to prevent or discourage appropriate innovation as per section 7 of the NPPF.

### SP3 Quality Urban Design within Places

Please see page 83 of the Preliminary Townscape & Visual Appraisal attached at Appendix 2, prepared by Barton Willmore’s Townscape Team and Fosters + Partners.

In respect of this policy, it supports its contents and seeks LB Newham’s agreement to refer to the Newham Character Study in policy SP3.
### SP4 Tall Buildings

Please see page 85 of the Preliminary Townscape & Visual Appraisal attached at **Appendix 2**, prepared by Barton Willmore’s Townscape Team and Fosters + Partners.

In respect of this policy, in summary it advises that reliance on indicative height specifications is not appropriate given that it is imperative that a design-led approach is adopted to derive the best response, rather than an arbitrary height limit placed that might stifle innovation and the ability to release the development potential of a site and the opportunities that it may present.

The Tall Buildings Local Plan Evidence Base document makes it clear that the permissible building heights are indicative rather than obligatory. This reference should be reflected in the wording of the policy as well as deletion of the word “controlled” from Policy SP4.

### SP5 Heritage and Other Successful Place-Making Assets

Please see page 86 of the Preliminary Townscape & Visual Appraisal attached at **Appendix 2**, prepared by Barton Willmore’s Townscape Team and Fosters + Partners.

In respect of this policy, it supports its content and seeks LB Newham’s agreement to refer to the Newham Character Study in policy SP5.

### J1 Business and Jobs Growth

- The strategic principle and spatial strategy of this policy are broadly supported. It is important for LBN to seek job growth and diversification of the Borough’s economy.

- Part 1b: It is correct that the promotion of employment needs to take a balanced approach in order to meet all the needs of the community.

- Part 2a: We support the continued development and promotion of the Arc of Opportunity and employment hubs as high-quality business environments with a diversity of flexible, future-proofed premises with particular strengths as set out in Table J.a. It is considered that flexibility is a key element of this policy, in order to create genuinely mixed-use areas. However, the references to wharf related uses should be deleted on the basis that the site is no longer intended to be used for wharf related use as a result of the wharf ‘consolidation’ proposals. Furthermore, this policy should not be too restrictive on the types of uses acceptable in employment hubs, in order for them to grow organically to meet market demand.

- Part 2a: In relation to E2 Thameside West, Table J.a advises that the key strengths will be B Class Uses (SIL), particularly high technology manufacturing, wharf related uses, cultural and creative, construction and green industries. However, SHL as landowners believe the following uses could also be appropriate: retail manufacturing, SME start-ups along with residential accommodation on upper levels if a good living environment can be demonstrated, and its introduction does not preclude the continued employment operation of the area, including adequate servicing arrangements.

### J2 Providing for Efficient Use of Employment Land

- Part 2a: We question LBN’s suggestion that there is notable development capacity on the Silvertown Landing site for employment intensification purposes. The safeguarding for the Cable Car and Silvertown Tunnel Crossing will render most of this site unable to be developed above ground level for anything other than open space. LB Newham should recognise that there is only very limited capacity on this site (focused in the northeast part of this site) for employment floorspace. Through a masterplan approach across the Thames Wharf and Silvertown Landing sites (a comprehensive proposal), there is scope to deliver employment related floorspace, however,
this should focus on employment generating uses that are compatible for residential uses located above them, rather than uses that cause noise or air quality impacts.

- Part 2b: The release of part of Silvertown Landing from SIL protection is strongly supported by SHL. It is considered that the area of Silvertown Landing which LBN seek to retain for SIL should also be released, particularly as the delivery of the Cable Car and Silvertown Tunnel Crossing will render most of the central and eastern parts of the site unable to be developed above ground level for anything other than open space. The remainder of this part of the site should also be released from SIL or be afforded more flexibility in the type of uses which it can accommodate. SHL consider that this area should be designated ‘SIL transition’, given it will be the buffer zone between the wider mixed-use allocation of Strategic Site’s referred to as Thames Wharf (S08) and Silvertown Landing (S09) and retained SIL Thameside West. It is considered that this area could comfortably accommodate an intensification of employment use, with no loss of functionality, whilst also allowing residential on the upper podium levels. It is considered that this part of the site could be designed to ensure the new housing can demonstrate neighbourliness as required by policy J1. This will create a successful mixed-use area, one of the strategic principles of policy J2.

- Page 154: The east part of the Silvertown Landing site should be allocated as ‘SIL Release’ or ‘SIL transition’

- Paragraph 6.87c: SHL object to the reference within this paragraph to Silvertown Landing having “particular capacity to accommodate displaced and consolidated heavier industrial uses.” It would not be appropriate to promote heavy industrial uses in a mixed-use allocation for Silvertown Landing, as there is a limited amount of development land available (as discussed above) and it would not be possible to create a suitable environment for these types of employment uses and residential to sit side by side. Paragraph 6.80b is applicable in this respect.

### J3 Skills and Access to Employment

| No objection to this policy in principle, however some flexibility should be introduced to the policy. For example, at part 3(b), ‘best endeavours’ should be included, as it may not be possible for these targets to be met on every development site, particularly sites located adjacent to the Borough boundary which may have no choice (for locational or sustainability reasons) but to draw workforce from adjoining boroughs. Part 3(b) should also refer to the tariff based contribution is should be subject to viability. |

### H1 Building Sustainable Mixed Communities

| Although the wording of the policy seeks to exceed 43,000 new dwellings between 2018 and 2033, as per our comments at Policy SP1 above, in order to adopt a “sound plan” LBN should seek to deliver the 10-year housing numbers set out in the new draft London Plan (rising from 19,945 to 38,500 over a 10 period). A higher target housing delivery target for the Canning Town/Custom House/Royal Docks area should be progressed, particularly when considering the new public transport improvements being delivered in the borough (e.g. Crossrail and additional DLR stations). |
| The requirement for all major development sites to deliver 39% family housing (3-bed plus) is very onerous and does not take into account that some development sites may not be suitable for family housing, due to a number of factors. This policy should be adjusted to set the 39% family housing target as a borough-wide target and to explain that site’s that can be demonstrated to be not / less appropriate for family housing, then LBN will consider a reduced percentage of family homes. |
Part 1d: It is not clear what “conventional housing means”. If this means, two or three storey family homes with gardens, this part of the policy should be deleted. Pursuing this approach will result in sites that have not delivered their full development potential, contrary to the NPPF, the London Plan and draft London Plan. On the basis that land in London is scarce, development sites should be optimised and the nature of homes to be constructed should be dictated by the market and registered providers that build to meet demand.

Part 1e: Please refer to the text set out in response to parts 1c and 1d, as above.

Part 2f: It is considered that this policy should also mention emerging context, which is particularly relevant for many of the Strategic Sites which are currently low lying albeit are expected to delivery significant development in the future alongside new infrastructure (for examples at Thames Wharf (S08) and Silvertown Landing), which will be serviced by a new DLR station and Crossrail). This policy should also consider new draft London Plan Policy D6 which seeks to optimise housing density and remove the old London Plan matrix system in lieu of a more design-led approach to site capacity, which is supported. This will ensure the most efficient use of land optimum density is achieved.

Table (Housing Delivery by Phase and Community Form Area): As per our comments at Policy SP1 above, in order to adopt a “sound plan” LBN should seek to deliver the 10-year housing numbers set out in the new draft London Plan (rising from 19,945 to 38,500 over a 10 period). A higher housing delivery target for the Royal Docks and the Custom House and Canning Town areas should be progressed, particularly when considering the new public transport improvements being delivered in the borough (e.g. Crossrail and additional DLR stations).

Paragraph 6.121: This policy should be adjusted to set the 39% family housing target as a borough-wide target, rather than a site by site target.

Box 1: An additional criterion to be added to the ‘Considerations for the Assessment of Housing Mix and Tenure’ is the proximity of the site to public transport facilities.

| H2 Affordable Housing | At no point in the policy H2, or its supporting text, is reference made to viability of schemes. In order to ensure this policy is flexible enough to meet the NPPF tests, SHL strongly recommend that the policy includes reference to schemes that do not accord with the affordable housing guidance contained in policy H2 will only be supported if they are accompanied by a financial viability assessment that has been prepared by a qualified independent assessor, and that the viability report takes account of the impact of physical infrastructure constraints. |
| INF1 Strategic Transport | Part 1b(vi): As set out under Policy S3 above, the new DLR at Thames Wharf will need to be positioned on the straight part of the track for operational reasons. This should be adjusted on the proposals map. |
| INF3 Waste and Recycling | It is difficult to understand where the schedule 1, schedule 2 or other waste sites are located. The map on page 295 identifies a number of ‘licenced Waste Sites’ on Thames Wharf (S08). These sites will be removed as a result of the Silvertown Tunnel DCO proposals. Notwithstanding this, these are not appropriate uses in the context of the strategic allocation for Thames Wharf (S08) for mixed use |
development, including residential. Furthermore, the current waste sites appear to be in the location designated for a future DLR station and local town centre. Accordingly, these sites should be removed from any protection under this policy and map on page 295 updated.

<table>
<thead>
<tr>
<th>INF5 Town Centre Hierarchy and Network</th>
<th>Part 2n: SHL supports the creation of a new local centre on the Thames Wharf site (S08)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Page 272 (Map – Retail Hierarchy Map): SHL supports the creation of a new local centre on the Thames Wharf site (S08)</td>
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</tbody>
</table>

**Strategic Site S08: Thames Wharf**

As per SHL’s representations in April 2017 to the ‘Issues and Options’ consultation (see Appendix 1), our client strongly supports the Strategic Allocation of the Site in principle. We do, however, have a number of comments in relation to the draft policy as follows:

**SIL Release:** The site allocation text should explain that the entirety of this site is the subject of “SIL release”. The Map on page 145 should be updated to reflect this.

**School:** SHL consider it is inappropriate for the construction of a school on this site, located in proximity to the Silver Town Tunnel crossing and underneath the landing / take flight path of London City Airport. These uses are unlikely to result in a conducive learning environment for pupils. The requirement for a school in this location should therefore be deleted from this site allocation.

**Storey Height:** The design and scale of any large development proposals must be design-led and supported by a masterplan approach, rather than constrained by inflexible parameters. In this case, we object to the rudimentary storey height restriction of ‘up to 15 storeys’ at key locations and 6 to 8 storeys elsewhere on the site. There is no clear justification for this restriction. Policy should not seek to limit the amount of development on the site, but rather optimise it, and should allow a critical mass of development which will support the remediation and delivery of sites. Furthermore, the Thames Wharf is located on the edge of Borough, influenced by tall development directly opposite in Greenwich and Tower Hamlets. The scale of development suggested in the site allocation would look out of place with other riverfront development in close proximity. Please also see the Townscape & Visual Appraisal at Appendix 2 which provides a case for deleting the height parameters for the Thames Wharf site in support of a design-led approach.

**Conclusion**

Considering the above, the supporting text for the Thames Wharf site allocation should be reworded as follows:

*Proposed release from Strategic Industrial Location (see Policy J2). There is scope to consolidate the safeguarded wharf at Central Thameside West (Royal Primrose Wharf) and subsequently to remove the wharf safeguarding at Thames Wharf, subject to there being no net loss of functionality or wharf capacity. This and Managed Release from SIL (see Policy J2) could provide the opportunity to develop a new neighbourhood, comprising new residential and community uses including a school and employment, leisure/ tourism uses grouped around a new DLR station and Local Centre. Continuous riverside access; links to the Lea River Park and across to Trinity Buoy Wharf, to Royal Victoria and West Silvertown DLR stations and Canning Town town centre; North Woolwich Road active street improvements; and appropriate connectivity and integration with adjacent Silvertown Landing strategic site will be secured. Indicative building heights of 6 to 8 storeys with buildings of up to 15 storeys at key locations.*
**Proposals for this site should seek to optimise development, including tall buildings, if it is demonstrated to be of the highest quality and in keeping with the character and appearance of the surrounding area.**

| Strategic Site: Silvertown Landing | As per SHL’s representations in April 2017 to the ‘Issues and Options’ consultation (see Appendix 1), our client strongly supports the Strategic Allocation of the Site in principle. We do, however, have a number of comments in relation to the draft policy as follows:

**SIL Retention (part of site):**

Although SHL appreciate the rationale for retaining SIL on part of the Silvertown Landing site in order to retain employment land and promote economic growth in this part of the Borough, it is felt that this is not an appropriate approach for this site and this aspiration could still be achieved without its continued protection for SIL, which is overly restrictive on a site which:

- On approval of the Silvertown Tunnel DCO will be devoid of most of the existing employment use on the site (the existing buildings will be removed as a result of the DCO works); and
- Will have a significantly reduced development capacity due to the Cable Car and following the construction of the Silvertown Tunnel, as land over the tunnel and below the cable car cannot be built on. This land can only be used as public open space.

It is considered that the northeast part of the site should more appropriately be designated an ‘Employment Led Mixed Use Area’ or ‘SIL transition/future release’, in order to allow residential and employment to be delivered in a ‘stacked’ manner making the best use of the Site and creating a new mixed-use neighbourhood. LBN’s aspirations for consolidation and modernisation of employment floorspace can still be achieved through this approach. SHL is committed to providing no not less of occupied employment floorspace on the site.

Should the SIL designation remain on part of the site (rather than SIL Transition), given the housing need in London, some flexibility should be added to the policy to allow residential use to also come forward on this element of the site, provided it does not prejudice current or future employment uses from operating. Furthermore, the apportionment of the SIL area should be significantly reduced taking into account the area of ‘no build’ due to the Silvertown Tunnel and the riverfront opportunity which would be best utilised for residential purposes. It is considered that the SIL designation should be focused to the north-east portion of the site, where it can be serviced from Dock Road/North Woolwich Road and does not impinge on the overall development capacity of the site.

Another important consideration is that the Silvertown Landing site will be developed in conjunction with the adjacent Thames Wharf site, through a masterplan process. It is intended that there will also be employment uses proposed on the Thames Wharf site, particularly around the new DLR station. Therefore, an overall uplift of employment will be delivered across both sites. Rather than protecting an arbitrary portion of land on Silvertown Landing, employment will be spread throughout the adjoining new neighbourhoods, through the emerging masterplan and place-making process.

**Wharf Safeguarding:** Reference to this should be removed from the ‘Constraints’ section of the policy as it does not apply to this site.
Storey Height: The design and scale of any large development proposals must be design-led and supported by a masterplan approach, rather than constrained by inflexible parameters. In this case, we object to the rudimentary storey height restriction of ‘up to 15 storeys’ at key locations and 6 to 8 storeys elsewhere on the site. Policy should not seek to limit the amount of development on the site, but rather optimise it. Furthermore, there is no clear justification for this restriction, for example the Marco Polo Building has not yet been built and therefore should not be used to dictate the wider design evolution of the docks. The redevelopment of the Site must deliver a critical mass of development which will support its remediation and delivery. Furthermore, the site is positioned on edge of Borough, influenced by tall development directly opposite in Greenwich and Tower Hamlets and would look out of place with other riverfront development in close proximity. Please see the Townscape & Visual Appraisal at Appendix 2 which provides a case for deleting the height parameters for the Thames Wharf site in support of a design-led approach.

Considering the above, the supporting text for the Thames Wharf site allocation should be reworded as follows:

*Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL and consolidation and strengthening of the transitional SIL on the eastern side of the site and beyond through continued SIL protection, together with strategic infrastructure. Employment uses on the transitional SIL should include modern industrial and warehousing, but may also link to the adjacent LMUA, with the scope to secure Managed Intensification (as per J2) and further release if new formats are realised, reducing the spatial footprint whilst achieving the same capacity, functionality and ability to respond to industrial and warehousing demand. The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL and include residential uses, green and community infrastructure meeting local need, and employment generating uses. Convenient and comfortable connections to the DLR stations at West Silvertown, Thames Wharf and Royal Victoria, and along and across North Woolwich Road will be improved as will pedestrian and cycle links through to and along the river (where public space will open out) and docks and to nearby local centres and Canning Town town centre. Indicative building heights 6 to 8 storeys buildings of up to 15 storeys being acceptable at key locations ensuring that views of and the pre-eminence of the distinctive Marco Polo building at Royal Wharf are protected. Proposals for this site should seek to optimise development, including tall buildings, if it is demonstrated to be of the highest quality and in keeping with the character and appearance of the surrounding area.*

SHL supports the general direction of travel proposed within the draft Local Plan and the principle of identifying the Thames Wharf and Silvertown Landing sites for SIL Release to allow their redevelopment for mixed use purposes. For the reasons summarised above, SHL consider that in some instances LBN is proposing policy that is not ‘positively prepared’, ‘justified’, ‘effective’ or ‘consistent with national policy’. Therefore, the draft Local Plan may fail to satisfy the ‘soundness’ tests outlined in paragraph 182 of the NPPF.

SHL would welcome an opportunity to discuss our findings in more detail with LBN officers, prior to the Local Plan being finalised and submitted to the Secretary of State, in seeking to resolve the objections and ensure that the Local Plan can subsequently be found sound. SHL would also like the opportunity to attend the examination and discuss our views with the Inspector.
In the meantime, we would be grateful if SHL’s representations could be taken into account when considering the next stages of the Local Plan preparation process. Confirmation of receipt would be appreciated.

Yours faithfully,

Director

Enc.

Cc.  - Silvertown Homes Ltd
     - Silvertown Homes Ltd
Appendix 1
Dear Sir or Madam,

LOCAL PLAN REVIEW: ISSUES AND OPTIONS CONSULTATION (FEBRUARY 2017)
RESPONSE ON BEHALF OF SILVERTOWN HOMES LTD

These representations have been prepared on behalf of Silvertown Homes Ltd (SHL) and set out comments in response to the Local Plan Review ‘Issues and Options’ Consultation February 2017.

In general, we welcome the London Borough of Newham’s (LBN) proactive approach to development within its borough. LBN recognises the need to identify/release sites for residential led mixed use development to help overcome London’s housing crisis, as well as acknowledging the significant opportunity of optimising underutilised sites for further development.

THE SITE AND BACKGROUND

Silvertown Homes Ltd are one of the main landholders of a circa 18ha site located within the administrative area of LBN, therefore they have a keen interest in this review of the Local Plan. The Site comprises two parts: the Carlsberg Tetley site and the Thames Wharf site (now known as Thames Side West). Please see Figure 1 overleaf showing the extent of the Site and the site location plan attached which illustrates the extent of SHL’s ownership at circa 6 ha, although they also have an interest in the wider site.

The Site is used for a variety of industrial/business/dock purposes at present and benefits from a significant length of River Thames frontage.
Access to the Site is taken from Dock Road, from the Lower Lea Crossing roundabout. The Site is highly sustainable located a 10-minute walk to two DLR stations (Royal Victoria and West Silvertown stations) that connect to the wider Overground and Underground network. Furthermore, a new DLR station is to be constructed on the Thames Wharf Site and Custom House Crossrail Station is programmed to be open in December 2018.

The Site’s planning history confirms that besides the Emirates Cable Car application in 2011, the history relates solely to industrial/business/dock purposes. However, the area around the Site has seen significant change in the past 10 years with substantial mixed use development sites coming forward at Royal Albert Dock, Royal Wharf and Silvertown Quays for example. This is due to the number of opportunity areas (OA) surrounding the Site, including the Royal Docks and Beckton Riverside (in which the Site lies), Greenwich Peninsula, Isle of Dogs and Lower Lea Valley.

The Site accommodates several transport infrastructure projects, including the elevated A1020 Silvertown Way/Lower Lea Crossing, the elevated Docklands Light Railway (DLR) Woolwich extension running north-west to south-east, the Jubilee Line (underground) and the Emirates Air Line (EAL) cable car running north-east to south-west across the River Thames.

**SILVERTOWN TUNNEL**

The Silvertown Tunnel is proposed to run underneath the Carlsberg Tetley Site and emerge on the Thames Wharf Site. Figure 2, overleaf, provides clarity on the indicative location of the tunnel and the likely road network that will alter the future layout proposals within the Site area.
Transport for London (TfL) submitted the Silvertown Tunnel Development Consent Order (DCO) to the Secretary of State (SOS) in May 2016. A six-month Examination in Public (EiP) of the Silvertown Tunnel scheme began on 11 October 2016. Once the examination is finished, no later than 11 April 2017, the Planning Inspectorate will have three months to make a recommendation to the Secretary of State for Transport.

The DCO application includes proposals to utilise the majority of the Site to store excavation material (or spoil) from the Tunnel during its construction. The DCO proposals would therefore mean, as currently proposed, that the current occupiers of the Site will be vacated from the Site for a period of approximately 7 years.

In the event that the DCO application is approved, the current policy position for the Site will need to be reviewed. For example, Core Strategy Policy J2 will need to be updated to acknowledge Silvertown Tunnel and its resulting temporary and in some case permanent loss of employment land. The Silvertown Tunnel is a catalyst for the Site’s future redevelopment for mixed use purposes, as advocated by LBN in the Issues and Options Part 2: Sites.

**OPERATIONAL DEVELOPMENT APPLICATION**

In parallel to the above, over the past couple of months, we have engaged with both LBN and the GLA with regards to a forthcoming planning application for ‘operational development’ on the Site. This application is being pursued by both Silvertown Homes Ltd and GLAP.

The operational development proposed can be summarised as:

- Demolition of existing buildings (outside of the Silvertown Tunnel DCO boundary);
• Increasing the Site’s ground level by utilizing the spoil excavated from the construction of the Silvertown Tunnel and spreading it across the Site; and

• Increasing the flood defence along the River Thames frontage to 6.2m AOD (EA 2100 flood defence level), facilitating the future delivery of a new river walkway.

The proposed development aims to utilise the spoil from the construction of the Silvertown Tunnel to create a development platform which will prepare the Site for future use that benefits from enhanced flood protection.

The planning application, which will be supported by an Environmental Statement (ES), is scheduled to be submitted in May. It is not anticipated that the proposal will cause any significant adverse effect. The ES for the Silvertown Tunnel advises that its significance of effect ranges from major beneficial to moderate adverse.

The operational development proposal will provide significant environmental benefits; not least reducing construction waste and traffic from the Site and safeguarding the flood risk of this part of the borough. Furthermore, it provides the opportunity to provide a riverside walk in the future, opening this part of the riverside to local residents and wider Londoners for the first time.

REPRESENTATIONS

We have reviewed the following documents on behalf of Silvertown Homes Ltd:

1. Local Plan Review, Issues and Options Part 1: Policies;
2. Local Plan Review, Issues and Options Part 2: Sites; and
3. Local Plan Review, Integrated Impact Assessment Appendix 4 – Sites IIAs

Our comments on each document are set out below.


Vision & Spatial Policies

With respect to the options for the Local Plan Review, as set out in pages 15 to 18 of Part 1, we consider LBN should progress with a combination of options 3, 4, 5, 6 and 7. It is considered that the ‘do nothing’ option would not be appropriate in the spirit of positive forward thinking spatial planning and would not assist LBN to meet its five-year land supply, helping to address the housing crisis in London.

We respond to the questions raised on page 19 as follows:

- Do any of the thematic policies (successful places, jobs, homes, sustainability, transport etc.) need to be further translated into implications for particular areas?

We consider that there is a huge opportunity for land that benefits from access to existing and new DLR stations, new Crossrail stations and access to the River Thames in the borough and this land should be specifically identified as “Riverside Opportunity Areas” (ROA) as a new policy theme. These ROA should focus on the
delivery of residential-led mixed use schemes that enable the delivery of a new continuous riverside walkway / cycle route, jobs (as a result of ground floor commercial floorspace) and high density development.

We have no other comments to make at this stage. However, we reserve the right to review and comment on the detail of the thematic policies at future stages of consultation.

- **Is our approach to new site allocations and existing site amendments appropriate?**
  - What are the preferred options on the new sites and existing site amendments?
  - Are site boundaries appropriate?
  - Have all constraints and opportunities been identified/ considered?

In principle, we support the approach taken by LBN in relation to identifying new sites allocations and amending existing site allocations. See comments below on Issues and Options Part 2: Sites.

- **Are there any sites that are developable and deliverable that we have not identified that aren’t already in the Plan?**

Whilst we do not wish to highlight any other sites for redevelopment that have not already been included in the Plan, we strongly support the inclusion of a New Strategic Site, Silvertown Landing and the continued allocation of S08 (Thames Wharf) for mixed use redevelopment. Both sites provide significant development opportunities for the borough to deliver the maximum amount of homes and jobs (see comments below on Issues and Options Part 2: Sites).

- **Are there any other area specific issues that we should be considering?**

Please see our comments in relation to the wording of S08 in Issues and Options Part 2: Sites.

We have no other comments to make at this stage. However, we reserve the right to review and comment on the detail of the thematic policies at future stages of consultation.

**Successful Places**

With respect to the options for the Local Plan Review, as set out in pages 23 to 26 of Part 1, we consider LBN should progress with option 2b. We consider that the principle of tall being in LBN should be encouraged where they can be supported on a case-by-case basis by a clear design rationale, high quality design / place-making and socio-economic benefits.

We respond to the questions raised on page 28 as follows:

- **Is there anything that creates and maintains successful and distinctive places in Newham that is not covered in the Local Plan?**

  No comment.

- **Is it helpful to define what a tall building is in the context of Newham: what is regarded as tall in this context?**
Yes, however there should be an element of flexibility in the wording to allow height to be design-led in the context of each site’s surrounding and assessed on a case-by-case basis. Otherwise LBN could unintentionally restrict the development potential of sites, when it should be optimised in accordance with the guidance contained within the NPPF.

- Should tall buildings especially very tall buildings be guided to Stratford and Canning Town, and should tall buildings in general be confined to the Arc of Opportunity and to allocated sites elsewhere in the borough?

   No. Each site’s appropriateness for a tall or very tall building should be considered on its individual merits. Otherwise LBN could unintentionally restrict the development potential of sites, when it should be optimised in accordance with the guidance contained within the NPPF. The tall building policy should not be too prescriptive and allow flexibility.

- Should mid-rise densities rather than stand-alone buildings be encouraged more in Newham?

   No. The scale / massing of development should be considered on its individual merits. Otherwise LBN could unintentionally restrict the development potential of sites, when it should be optimised in accordance with the guidance contained within the NPPF.

- Are the indicative heights for the strategic sites appropriate?

   No. See comments below in relation to Issues and Options Part 2: Sites.

- What width should the Canning Town central area for tall buildings be drawn?

   No comment.

- Should the height of a new building be proportionate to its location in the borough’s hierarchy of town centres?

   No. The scale / massing of development should be considered on its individual merits. Otherwise LBN could unintentionally restrict the development potential of sites, when it should be optimised in accordance with the guidance contained within the NPPF.

- Would the creation of large strategic sites in multiple ownership at town centres in the borough help catalyse regeneration?

   No comment.

- Do the proposed edits and additions to the Successful Places policies raise any significant issues?

   No comment.

**Jobs, Business and Skills**

With respect to the options for the Local Plan Review, as set out in pages 32 to 36 of Part 1, we consider LBN should progress with option 3a. In particular, we support the release of land at Thame Wharf (S08) and Carlsberg-
Tetley (Thames Landing) site from employment use to enable the creation of a residential-led mixed use scheme that will benefit from direct access from a new DLR station and access to Crossrail. The continued use of these relatively underutilised sites will not realise the full potential / capacity of the new DLR station to be constructed on the Thames Wharf site. Their redevelopment will deliver much needed homes, jobs, other socio-economic benefits and will ensure that the full potential of the new DLR station is realised. Also, see our comments below on Issues and Options Part 2: Sites.

We have no comments to the questions raised on page 37.

Homes

With respect to the options for the Local Plan Review, as set out in pages 41 to 46 of Part 1, we consider LBN should progress with option 7. In view of the housing crisis in London (and nation-wide), the priority for the Plan should be boosting significantly the supply of homes in the Borough, particularly on large under-utilised sites that benefit from access to existing and future public transport facilities.

We respond to the questions raised on page 47 as follows:

- *Are we doing enough to facilitate the delivery of an appropriate mix of quality accommodation that meets the needs of Newham’s residents? Should we:*
  - Prioritise family over affordable housing or vice versa, or continue to prioritise both?
  - Introduce an affordable housing minimum (floor), in addition to retaining the existing policy targets?
  - Allow subdivision/conversion of very large houses, provided that they yield family homes?

  It is considered that the housing policies should be as flexible as possible to avoid any unnecessary delays to development. It would not be correct to prioritise family sized units over affordable. The circumstances of each site should be taken into account in the formulation of its most appropriate mix and tenure of uses.

- *Should we be introducing specific policy to manage the delivery of purpose-built PRS?*

  Both the Government and the GLA welcomes PRS/’Build to Rent’ as a desirable and enduring feature of the housing market. Their support for the product is set out within the Housing White Paper and the GLA’s draft Affordable Housing and Viability SPG. Therefore, it would be sensible for LBN to develop a specific policy for the product.

  It should not however be promoted over conventional housing but rather sites alongside as another type of housing which may be suitable on a range of sites within the borough.

- *Are there any other housing related issues that we should be considering beyond these and those already in the Plan?*

  No comment.
**Sustainability & Climate Change and Associated Infrastructure (green, blue, energy, waste)**

With respect to the options for the Local Plan Review, as set out in pages 51 to 56 of Part 1, we consider there is no need for LBN to adjust its current approach to the above topic areas, except for option 3b – establishing an in-principle support for flood defence improvements. More specifically, the in principle of the redevelopment of riverside sites should be actively supported by LBN to improve flood defences. For example, one of the benefits of allowing the redevelopment of riverside sites (such as Thames Wharf and Carlsberg-Tetley) for residential-led mixed use schemes is the financial ability to increase the flood defence level of these sites (to say TE2100 level), which is a cost that these underutilised employment sites are unable to afford to do.

We have no comments to make in respect of the questions raised on page 56.

**Infrastructure - Transport**

With respect to the options for the Local Plan Review, as set out in pages 60 to 63 of Part 1, we consider there is no need for LBN to adjust its current approach to the above topic areas.

We have only one comment to make in respect of the first question raised on page 63. We consider that the redevelopment of riverside sites for residential-led mixed use schemes should not only be actively supported by LBN to secure improved flood defences (which under-utilised employment uses cannot viably afford to undertake) but also to enable delivery of a continuous riverside walk that can be used by pedestrians and cyclists. This would help to improve London’s sustainable transport modes network.

**Infrastructure - Social Infrastructure (retail Hierarchy & network and community facilities)**

With respect to the options for the Local Plan Review, as set out in pages 68 to 73 of Part 1, we consider LBN should progress with option 6b, particularly the identification of a new local centre on Site Reference S08, adjacent to the new DLR Station, but as part of a residential-led mixed use scheme. The residential component of the scheme will provide a need / income generator for this new local centre as well as homes for the employees.

We have only one comment to make in respect of the first question raised on page 74. We consider that in order to deliver successful, high quality, place-making and sustainable environments, LBN should actively encourage the incorporation of new housing alongside new community facilities (e.g. new local centres).

**Social and Physical Infrastructure Delivery**

With respect to the options for the Local Plan Review, as set out in pages 78 to 80 of Part 1, we consider there is no need for LBN to adjust its current approach to the above topic areas as it accords with the test set out in the CIL Regulations. Option 1 should therefore be progressed.

We have no comments to make in respect of the questions raised on page 80.

2. **Local Plan Review, Issues and Options Part 2: Sites**

In respect of this part of the Local Plan Review, we wish to comment as follows:
As set out earlier, our client is a major landholder of the Silvertown Landing site (including Carlsberg Tetley and Dohm Wharf). We strongly support proposed Option 1, to allocate the Site for mixed use development. This proposal would align with the GLA’s Working Draft Royal Docks & Beckton Riverside Opportunity Area Planning Framework (OAPF, March 2016) which identifies this site and the adjacent sites as “potential SIL release to resi/mixed use” – see Figure. We agree with the opportunities highlighted by LBN:

- The Site could utilise the proposed DLR station at Thames Wharf adjacent and it is also in walking distance at present to a Royal Victoria and West Silvertown DLR stations, Canning Town Tube station and the future Custom House Crossrail Station, providing access to Central London (Bond Street) within 16 minutes (trains will run every 5 minutes during peak periods);

- Close to future and current amenities, including Canning Town Centre. Furthermore, any mixed-use development on the Site could provide services for future residents;

- It is a large site and has capacity to provide a significant uplift of both residential (including affordable) and employment opportunities for the Borough and wider London need; and

- Its high-profile riverside location offers a good working and living environment, with access and links to the Thames Path and Lea River Park. This would be highly desirable to future occupants.

Furthermore, the Site (including Thames Wharf, discussed below) is located within an Opportunity Area (Royal Docks and Beckton Riverside) which will include aspirations to deliver 25,500 new homes and 60,000 new jobs within this area – only 11,500 new homes and 37,000 jobs are currently being delivered. The delivery of homes and commercial floorspace on the Silvertown Landing site and Thames Wharf site will not only assist in meeting the objectives of the Opportunity Area, but will assist in the GLA and LBN in helping to meet their housing targets, which has become a critical issue across London. In addition, the land is under-used and, in line with paragraphs 17 and 22 of the NPPF, its protection should be reviewed with a view to release to other uses.

In relation to the constraints highlighted, it is considered that these could be alleviated through management and mitigation strategies which would be agreed with LBN during pre-application engagement for any future planning application.

With respect to ‘Height and Density’, we agree with LBN that this should be a high-density site, given its sustainable location and PDL designation.

With respect to the indicative heights guideline, we consider that this should not be prescriptive in the Local Plan Review. This should be led by design and masterplanning objectives, promoted by the architect and the evidence prepared in support of any proposal (including a Townscape & Visual Impact Assessment and Design & Access Statement).

Notwithstanding the technical constraints (such as London City Airport PSZ and OLS) which future designers will fully respect in the design evolution, it is considered that there is significant scope to promote height beyond 12 storeys on the Site, given its riverside location, where landmark buildings are expected, its close
proximity to sustainable transport options and in the context of other tall buildings in the area. Examples of consented/promoted height in the area include:

- Western Gateway Canning Town – 20 storeys;
- Deanston Wharf – 19 storeys;
- Pontoon Dock – 15 storeys; and
- Royal Wharf – 15 storeys.

In addition, in the riverside context in both Tower Hamlets and Greenwich development of 30 plus storeys has been approved at Leamouth Peninsula South and Greenwich Peninsula.

One must also acknowledge and appreciate that there will be significant remediation costs involved in the realisation of these Sites for mixed use development, including the flood mitigation proposed as part of the ‘operational development’ application. The redevelopment of the Sites must therefore deliver a critical mass of development which will support this.

![Figure 3 - Extract of draft RD&BR OAPF with site highlighted](image)

- **S08 - Thames Wharf (Change to Existing Strategic Site)**

  We support LBN’s continued allocation of Thames Wharf for SIL release for mixed use development purposes. The additions proposed to the allocation are supported – connection across the River Lea and creation of a new local centre around the proposed DLR station. We also support the increase in density at the Site from medium to high density. As per our comments on Silvertown Landing, above, we consider that height should not be prescriptive at this stage, as it will be led by design and masterplanning, and other constraints such as the London City Airport OLS. It is considered that this site and the adjacent
Silvertown Landing site could provide significant opportunities for landmark tall buildings along the Riverfront to correspond with the development at Greenwich Peninsula around the O2.

Furthermore, it is considered that the allocation of both the Thames Wharf site and the Silvertown Landing site for residential-led mixed use development provides the critical mass to provide a number of local services (school, community centre etc.) to create a highly sustainable community in this part of Newham.

In relation to wharf safeguarding, we support the proposal in the Draft Royal Docks and Beckton Riverside OAPF for the consolidation of wharf capacity to the site at Peruvian Wharf to enable the release of Thames Wharf from the current safeguarding designation. This would open up the riverfront to enable a continuous Thames Path to be delivered along the river front.

Notwithstanding the above, we do however consider that the policy could be more positively worded to promote the Site’s delivery. At present the wording of the policy presents a number of barriers/obstacles to development, including loss of SIL (Policy J2) and reconfiguration of the safeguarded wharf. It is considered that both of these issues could be managed through the planning application process - through provision of better quality employment, as part of a mixed use application and a strategy for relocation of the wharf or its re-provision as part of a mixed use development. It is not considered that the detailed justification at J2 is required for a Site that LBN have already agreed to re-designate from SIL to mixed use, on the basis of its evidence base. In addition, the GLA will provide advice on the wharf release.

Strategic Sites S09 and S22 are also previous SIL designated sites, however they are more positively worded for development.

We therefore respectfully seek that the S08 is reworded as follows:

The site will be de-designated from a Strategic Industrial Location in order to realise its regeneration potential and to ensure creation of a new local centre around the proposed DLR station. Proposed release from Strategic Industrial Location (see Policy J2). There is scope to reconfigure the safeguarded wharf on the site to the adjacent site (Carlsberg-Tetley), or to remove the wharf safeguarding at Thames Wharf if a consolidated wharf can be delivered at Thameside West, subject to there being no net loss of functionality or wharf capacity. If it can be demonstrated that either scheme can be delivered, this could. The site provides the opportunity to develop new employment, leisure/tourism and residential uses around a potential new local centre around the DLR station, where passive provision is in place, subject to addressing the constraints on the site, including the Silvertown Crossing safeguarding area, and the removal of the wharf safeguarding by the Secretary of State. Indicative residential typology - medium density, medium family high density.

The Council will work together with other public sector agencies and developers to further investigate proposals for relocating or consolidating the four individual safeguarded wharves at Thameside West, to facilitate a more efficient use of land, and support the growing neighbourhood at Silvertown. See Policies INF1 and J2 for details.
3. **Local Plan Review, Integrated Impact Assessment Appendix 4 - Sites IIA s**

We have reviewed Appendix 4 of the Integrated Impact Assessment only in relation to Silvertown Landing (LPR49) on pages 94-101.

Our comments are as follows:

- We support the Site’s expected allocation for a Mixed Use Strategic Site.

- We support LBN’s overall summary that the “mixed use allocation could support housing, employment and place-making/sustainable communities objectives, including local environmental improvements, through helping to bring forward redevelopment on site, making better use of the site as part of a wider development area that includes strategic transport investment, and securing better integration with the wider context.”

- It is considered that through a careful masterplanning approach of the Site and the adjacent Thames Wharf, the Site Allocation aspirations can be achieved.

- We agree with LBN’s overall conclusions in relation to the IIA objectives. The designation of the Site for redevelopment will:
  
  - Provide an opportunity to reduce poverty and promote further equality of opportunity in several ways compared to the present situation;
  - Provide a good opportunity to contribute to healthier lifestyles, provided walkability is designed in (connecting with the existing network and DLR/bus access) and mitigation of noise and contamination is undertaken;
  - Offer the opportunity to create a successful neighbourhood from an under-used site;
  - Allow for the provision of a choice of new quality housing within the mix, providing any negative impacts of the SIL, any new employment generating uses, the future tunnel and road are addressed;
  - Encourage the redevelopment of an underused and largely vacant plot of land. It will present opportunities for investment in a mix of uses and higher quality business environment in the Royal Docks. Additional population in the area would support businesses and development to add to the pool of local labour;
  - Ensure inclusive access to a range of high-quality community facilities and open space;
  - Promote resource-efficient development, design and construction – activation of the new DLR station on Thames Wharf and the provision of energy efficient building;
  - Improve air and water quality – incorporate SUDS, increase levels of greening on the Site and redevelopment is likely to reduce freight to the site and therefore improve air quality;
  - Increase the proportion of journeys made by sustainable modes of transport – opportunity to reduce dominance of cars and improve access for pedestrians and cyclists and supports activation of new DLR station on Thames Wharf;
  - Minimise the production of waste across all sectors and promote the proximity principle;
  - Minimise and reduce flood risk (see comments earlier on ‘operational development’ application);
• Enhance and protect existing habitats and biodiversity - increased greening of Site and enhancement and protection of adjacent SINC.
• Enhance character, protecting, conserving and enhancing heritage and other character assets - archaeological investigation.

We would be grateful if the above representations could be taken into account when considering the next stages of the Local Plan preparation process. Confirmation of receipt would be appreciated.

Yours sincerely

[Signature]

Director

Enc.

Cc. [Redacted] - Silvertown Homes Ltd
APPENDIX 2

PRELIMINARY TOWNSCAPE & VISUAL APPRAISAL
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INTRODUCTION
INTRODUCTION

Barton Willmore Landscape Planning and Design (BWLPD) was commissioned by Silvertown Homes Ltd to undertake a Preliminary Townscape and Visual Appraisal of the land at Thames Wharf/The Silvertown Landing Area (the ‘Site’), in the context of the London Borough of Newham Proposed Submission Draft Local Plan (Regulation 19) Consultation.

1. OVERVIEW

The aims of this Preliminary Townscape and Visual Appraisal are to:

- Determine the townscapе characteristics and quality of the Site and its surroundings, and its function within the townscape;
- Assess the visibility of the Site and the nature and quality of the existing views from the surrounding area;
- Identify the opportunities and constraints to the redevelopment of the Site, from a townscapе and visual perspective;
- Determine the ability of the Site to accommodate mixed-use residential-led development; and
- Consider the findings of the Proposed Submission Draft Local Plan and whether its commentary in relation to the Site and townscapе and visual matters can be considered ‘sound’.
PLANNING OVERVIEW
2. PLANNING CONTEXT

NATIONAL POLICY

National Planning Policy Framework, 2012

2.1 The NPPF promotes a presumption in favour of sustainable development, defined as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”, providing that it is in accordance with the relevant up-to-date Local Plan and the policies set out in the NPPF, including those identifying restrictions with regard to designated areas.

2.2 The NPPF states “the purpose of the planning system is to contribute to the achievement of sustainable development” and that there are “three dimensions to sustainable development: economic, social and environmental”.

2.3 The role the environment plays is described as “contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use of natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

2.4 The Core Planning Principles, set out in Paragraph 17 of the NPPF, include for taking account of the different roles and character of different areas, as well as enhancing and improving the places in which people live and the effect use of land by re-using land that has previously been developed.

2.5 Relevant principles with regards to townscape and visual matters are that planning should:

- “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; and

- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as wildlife, recreation, flood risk mitigation, carbon storage, or food production)...”
2.6 NPPF Section 7: Requiring Good Design provides guidance on ensuring the delivery of good design by responding to local character and establishing a strong sense of place, while optimising the potential of a site to accommodate development so that it will add to the overall quality of an area.

2.7 Paragraph 58 states that planning policies and decisions should aim to ensure that developments:

- “establish a strong sense of place...;"
- respond to local character and history, and reflect the identity of local surroundings, while not preventing or discouraging appropriate innovation; and
- are visually attractive as a result of good architecture and appropriate landscaping.”

2.8 NPPF Section 11: Conserving and Enhancing the Natural Environment (Paragraph 109) states that the planning system should contribute to, and enhance, the local environment; and encourage the effective use of land by re-using previously developed land, provided that it is not of high environmental value.

2.9 Paragraph 114 states that planning authorities should:

“...plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure...”

2.10 NPPF Paragraph 118 states:

“...opportunities to incorporate biodiversity in and around developments should be encouraged...”

National Planning Practice Guidance

2.11 In relation to Design, the following are stated as ‘well-designed’ attributes:

- “Functionality;
- Support mixed uses and tenures;
- Include successful public spaces;
- Be adaptable and resilient;
- Have a distinctive character;
- Be attractive; and
- Encourage ease of movement.”

2.12 Key issues in relation to the Natural Environment are:

- “Landscape;
- Biodiversity and Ecosystems;
- Green Infrastructure; and
- Brownfield land, soils and agricultural land.”
Royal Docks and Beckton Riverside Opportunity Area in relation to Greater London
REGIONAL POLICY

The London Plan

2.13 The London Plan was adopted in March 2016. This document constitutes the strategic development plan under Section 70 of the Town and County Planning Act 1990.

2.14 Policy 1.1 sets out the overarching visions and objectives for London, whilst Policy 2.9 sets out the vision and strategy for Inner London. Policy 1.1B states:

“Growth will be supported and managed across all parts of London to ensure it takes place within the current boundaries of Greater London without:

a) Encroaching on the Green Belt, or on London’s protected open spaces;

b) Having unacceptable impacts on the environment.

The development of east London will be a particular priority to address existing need for development, regeneration and promotion of social and economic convergence with other parts of London and as the location for the largest opportunities for new homes and jobs.”

2.15 The Site lies within the Royal Docks and Beckton Waterfront Opportunity Area (28) as identified on Map 2.4 within the London Plan. Policy 2.13 sets out the planning framework for opportunity areas and intensification areas, with Policy 2.13B stating:

“Development proposals within opportunity areas and intensification areas should:

a) Support the strategic policy directions for the opportunity areas and intensification areas… and where relevant, in adopted opportunity area planning frameworks;

b) Seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses;

c) Contribute towards meetings (or where appropriate, exceeding) the minimum guidelines for housing…;

d) Realise scope for intensification associated with existing or proposed improvements in public transport accessibility, such as Crossrail…; and

e) Support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.”

2.16 The Royal Docks and Waterfront Opportunity Area (28) is described within Annex One of the London Plan as follows:

“The Royal Docks will return to its former glory at the forefront of international trade and exchange. The regeneration of Silvertown Quays, Royal Albert Rock and Royal Albert Basin should build upon innovative and iconic developments such as the Siemens Crystal and...
the Emirates Air Line cable car. The Enterprise Zone will support its role as a world class business destination with capacity for at least 6,000 jobs. Joint public and private investment will create London’s first Asian business park. The potential for a new ‘floating village’ should be explored as part of the Royals’ potential to accommodate at least 11,000 new homes. Key issues to be addressed include maximising the benefits of the Crossrail station at Custom House, future growth of London City Airport, capitalising on the success of ExCel and its potential as a focus for further visitor/business related growth and improving connections to London Riverside.

For Thameside West, strategic development principles are set out in the adopted Lower Lee Valley OAPF. 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.”

2.17 Policy 2.18 sets out the planning policy requirements for green infrastructure, with Policy 2.18E stating:

“Development proposals should:

a) Incorporate appropriate elements of green infrastructure that are integrated into the wider network; and

b) Encourage the linkage of green infrastructure including the Blue Ribbon Network, to the wider public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening…”

2.18 This is supported by Policy 5.1 which considers urban greening, with Policy 5.10C stating:

“Development proposals should integrate green infrastructure from the beginning of the design process to contribute to urban greening, including the public realm. Elements that can contribute to this include tree planting, green roofs and walls, and soft landscaping…”

2.19 Trees and woodlands are considered within Policy 7.21, which states that:

“Existing trees of value should be retained… wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species”.

2.20 The quality and design of new housing developments is considered within Policy 3.5, with Policy 3.5B providing for:

“The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people.”
2.21 Specifically regarding large residential developments, Policy 3.7 states that proposals should “...create neighbourhoods with a distinctive character...”.

2.22 Policy 7.1 provides the overarching framework to place shaping and ‘lifetime neighbourhoods’. In order to achieve neighbourhoods of a good quality and environment fostering active local communities, Policy 7.1D seeks that:

“The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability, and accessibility of the neighbourhood.”

2.23 Specifically regarding local character, Policy 7.4 states:

“Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area’s visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character of the future function of the area.

Buildings, streets and open spaces should provide a high quality design response that:

a) Has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass;
b) Contribute to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area;
c) Is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings;
d) Allows existing buildings and structure that make a positive contribution to the character of a place to influence the future character of the area; and

e) Is informed by the surrounding historic environment...”

2.24 Policy 7.5 of the London Plan explains that the quality of the public realm has a significant influence on quality of life as it affects people’s sense of place, security and belonging. For these reasons, public and private open spaces, and the buildings that frame those spaces, should contribute to the highest standards of comfort, security and ease of movement possible. Policy 7.5B provides that:

“Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way. Landscape treatment, street furniture and infrastructure should be of the highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space.”
Opportunities for the integration of high quality public art should be considered, and opportunities for greening (such as through planting of trees and other soft landscaping wherever possible) should be maximised. Treatment of the public realm should be informed by the heritage values of the place, where appropriate.”

2.25 The quality of architecture is considered in Policy 7.6, which states:

”Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. Buildings and structures should:

a) Be of the highest architectural quality;

b) Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;

c) Comprise details and materials that complement, not necessarily replicate, the local architectural character; and

d) Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings…”

2.26 Policy 7.7 of the London Plan explains that tall and large buildings should generally be limited to sites in the Central Activity Zone, Opportunity Areas, Areas of Intensification or Town Centres that have good access to public transport, stating that “tall and large buildings should not have an unacceptably harmful impact on their surroundings”.

2.27 Furthermore, Policy 7.7 states that tall buildings should “relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm” and should “improve the legibility of an area, by emphasising a point of civic or visual significance”.

2.28 Policy 7.7E provides additional criteria with respect to the impact of tall buildings in sensitive locations, stating:
“The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings and their settings, registered historic parks and gardens, scheduled monuments, battlefields, the edge of the Green Belt or Metropolitan Open Land, World Heritage Sites or other areas designed by boroughs as being sensitive or inappropriate for tall buildings”.

This is supported by Policy 7.8 which seeks to protect heritage assets and archaeology, with “development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architecture detail”.

SUPPLEMENTARY PLANNING GUIDANCE

Guidance on Tall Buildings

2.29 Historic England published Advice Note 4 ‘Tall Buildings’ in December 2015, which updates the previous guidance on tall buildings prepared by English Heritage and CABE, and states that a tall building should satisfy the following design criteria:

- Architectural quality;
- Sustainable design and construction;
- Credibility of the design;
- Contribution to public space and facilities;
• Consideration of the impact on the local environment (and particularly at ground level); and
• Provision of a well-designed inclusive environment.”

2.30 The guidance notes in Paragraph 4.5 that a high quality tall building scheme will have a positive relationship with the following:
• “Topography;
• Character of place;
• Heritage assets and their settings;
• Height and scale of development (immediate, intermediate and town-or city-wide);
• Urban grain and streetscape;
• Open spaces;
• Rivers and waterways;
• Important views including prospects and panoramas; and
• The impact on the skyline.”

2.31 As set out in Paragraph 4.8, in order to deliver architectural quality there must be consideration of a tall building’s:
• “Scale;
• Form and massing;
• Proportion and silhouette;
• Facing materials;
• Detailed surface design;
• Relationship to other structures;
• Impact on streetscape and near views;
• Impact on cityscape and distance views; and
• Impact on the skyline.”

2.32 Paragraph 4.9 goes on to states that:
“Tall buildings need to set exemplary standards in design because of their scale, mass, wider impact and likely longevity. Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history...”

2.33 While Paragraph 4.10 notes that:
“...Consideration of the impact on the local environment is also important, including microclimate, overshadowing, night-time appearance, light pollution, vehicle movements, the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience. Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape.”
OTHER RELEVANT PLANNING DOCUMENTS

Local Plan Evidence Base - Tall Buildings

2.34 The Tall Buildings document, published by the London Borough of Newham in February 2017, forms part of the Local Plan Evidence Base to guide the formation of the tall buildings policy for the London Borough of Newham.

2.35 Under the heading of ‘Issues with tall buildings’ it is noted that:

“It is worthwhile to consider the positive aspects of tall buildings which make them an attractive development from several perspectives. In the right place well-designed tall buildings can make a positive contribution to urban life...

...Well-designed tall buildings can provide an inclusive environment, both internally and externally by providing safe and pleasant public realm, taking opportunities to offer improved permeability, accessibly and, where appropriate, the opening up or effective closure of views to improve the legibility of the wider townscape...”

2.36 The Tall Buildings document provides an analysis of post 2012 consents, noting that nine sites were in locations where the building height matrix indicated a lower height, and were justified on the basis of public transport accessibility and the presence of neighbouring tall buildings.

2.37 The analysis goes on to conclude that:

“No instances were found of an unjustified approval which directly contravened the policy but rather the policy has been formulated with an inherent flexibility to allow for design innovation pertaining to quality. The facility should be retained in the review.”

2.38 The following conclusions on tall buildings are provided:

• “Importance of a plan-led approach to tall buildings, with more site specific detail on larger sites regarding appropriate and sensitive locations and scale, including integration considerations - this needs to include considerations of cross boundary spatial integration;

• A tall building may not be the best use of a site;

• Importance of integration of the tall buildings with the public realm, and general neighbourliness - ‘giving something back’; and

• Design quality is of utmost importance and includes the development of high quality living accommodation for a tall building’s residents; reference should be made to the new Historic England Advice note.”
2.39 The Tall Buildings Study 2017 also forms part of the evidence base and Options Appraisal for the review of the Local Plan. The document focuses on established appropriate densities and provides indicative appropriate heights for tall buildings at proposed and existing strategic sites across the borough.

2.40 The methodology for the study notes:
“...The in-principle acceptability of a new tall building is established firstly by its location with good access to public transport; and secondly by its location in an area where local character would not be affected adversely by the scale, mass or bulk of a tall or large buildings...

...Appropriate building height ranges are then derived from the particular characteristics of the individual Strategic Site in the context of the characteristics of each community neighbourhood as identified by the Character Study based upon an examination of topography, views, heritage, public transport accessibility, and character including current tall building presence.”

2.41 The study notes that the Royal Docks neighbourhood area, within which the Site lies, is generally characterised by tall buildings.

2.42 With regards to Public Transport Accessibility Levels (PTALs), it is noted that “the possibility for new DLR stations in the borough will benefit the Beckton Riverside and Thames Wharf strategic sites” while also recognising that increased accessibility will justify “high density development and tall buildings to mark the improved transport node[s]”.

2.43 Concerning the Royal Docks Neighbourhood it is noted that “new development generally have baseline heights of 6 to 8 storeys with taller elements of up to 15 storeys at key points” while concerning the as yet unbuilt 18 storey Marco Polo Building at Royal Wharf, it is considered “to be a focal point in the development of the riverside areas in this neighbourhood to which future schemes should relate”.

2.44 Strategic sites within the borough are provided greater scrutiny. Concerning the south-eastern part of the Site, under the heading of ‘Silvertown Landing’ it is noted with respect to building heights that:

“...Although currently a low-rise industrial location, the area is dominated by nearby tall buildings. Western Beach apartments immediately adjacent the site is between 8 and 12 storeys, buildings around Royal Victoria DLR station including the Hoola Towers extend up to 24 storeys. On the other side of the river, tall buildings 25 to 30 storeys high are visible around the O2 Arena and Greenwich Millennium Village. Further to the [east], a major development has been accepted at Silvertown Quays in outline form for heights of up to 16 storeys with the support of the Design Review Panel...”
2.45 The conclusion to Silvertown Landing notes: “An overall datum of 6 to 8 storeys is considered appropriate at riverside strategic sites in Newham in line with current trends. The Design Review Panel has indicated in its assessment of proposals at a number of the riverside sites that heights of up to 15 storeys can be accepted at key locations. It will be difficult to justify a height exceeding this parameter when a unified approach to all the riverside strategic sites is focused on the Macro Polo Building (18 storeys) which stands at a prominent curve in the river on Bugsbys Reach as the dominant building in the area the setting of which is required to be enhanced by other new developments along the river. The indicative height for this site supports place-making in the borough by promoting a cohesive range of heights within the Arc of Opportunity”.

2.46 It is further noted that “heights are indicative, based on the initial screening and SP4 spatial strategy, and variation from them would be through the detailed design process in line with SP4”.

2.47 With regards to the north-western part of the Site, which is considered under the heading of Strategic Site (SO8) Thames Wharf, the same text as is provided for Silvertown Landing in relation to building heights is outlined.

2.48 Concerning views, it is noted that: “The location of the site on the riverfront means that new tall buildings will be prominent in views of the north bank of the Thames. All the more so when enhanced pedestrian and cycle routes and promenades are being developed on the south bank of the river giving unbroken and direct views across the river to Newham.

Views of the river from highways and public areas on the Newham side are currently obstructed by existing development. Careful layout of new development will afford opportunities to open up views of the river, and the south bank of the allocation affords the potential for a riverside path which in time can [be] integrated with other routes at similar development sites along the river.

There are also opportunities at this site for views to the Royal Docks to be made use of in the layout of its development as vistas and linkages in the blue ribbon network.”

2.49 The conclusion states: “Given the proposed new local centre and DLR station, plus the new evolving height context, high density development is considered appropriate at this location with heights generally of between 6-8 storeys, and up to 15 storeys at key locations subject to master-planning and aviation constraints. Despite precedents for taller buildings in the area, new development on Newham’s riverside is laid out in a cohesive and well-planned way with a co-ordinated range of heights across all the riverside sites within the Arc of Opportunity.”
SITE CONTEXT
3. TOWNSCAPE SETTING

LAND USE

3.1 As illustrated in the adjacent Site Context Plan, the Site adjoins the confluence between the River Lea and the River Thames within the London Borough of Newham. Accordingly, the River Lea forms the western boundary to the Site and the River Thames forms the southern boundary. The northern boundary of the Site is defined by the A1020 Silvertown Way, while Bell Lane defines its eastern boundary.

3.2 The land use of the Site predominantly comprises a series of industrial units that are generally three storeys in height arranged around workyards/courtyards, that are cluttered with various equipment and materials. Two roads pass through the Site, Dock Road and Scarab Close, which are accessed off the A1020, while the elevated Docklands Light Railway (DLR) also passes directly through the centre of the Site. Two Emirates Air Line towers and a pylon tower also lie within the Site, with some scrub and tree vegetation also present.

3.3 The surrounding area is characterised by a diverse range of land uses of varying scale and built form. Low-rise industrial and commercial units occupy Trinity Buoy Wharf, which lies to the west of the Site across the River Lea, while to the north of this Wharf is the Leamouth Peninsula, which features high-rise residential built form. Further to the west, beyond Trinity Buoy Wharf, larger scale residential and office blocks predominate, gradually stepping up in height towards the iconic Canary Wharf that stands at over 50 storeys at its peak.
3.4 Across the River Thames to the south, the world-renowned O2 Arena occupies the northernmost point of Greenwich Peninsula. Much of the peninsula is currently subject to intense construction activities that will result in high-rise development across this area. The Emirates Air Line southern terminus is also located on Greenwich Peninsula.

3.5 North-east of the Site, beyond the A1020 Silvertown Way lies Royal Victoria Dock, which forms the western part of the Royal Docks. Predominantly 3 - 5 storey residential development lies to the south of this body of water, while larger scale mixed-use development lies to the north. Millennium Mills also lies to the south of Royal Victoria Dock, beyond the aforementioned residential development, while London City Airport lies further afield to the east.

3.6 In addition, the Crystal building and the Emirates Air Line northern terminus also adjoin Royal Victoria Dock to the north of the Site, as does ExCel London, to the north-east and opposite Millennium Mills across Royal Victoria Dock. Smaller scale residential development at Canning Town predominates further afield to the north, away from the Royal Docks.

3.7 To the immediate south-east of the Site the land use predominantly comprises a mix of industrial units of varying scale, interspersed with areas of vacant land as well as Lyle Park. Further to the east there are extensive construction activities ongoing associated with the redevelopment of Minoco Wharf (also known as Royal Wharf), beyond which lies the Thames Barrier Park and the Thames Barrier itself.

3.8 At a more strategic scale, the centre of London lies to the west; Stratford to the north; Greenwich to the south and Woolwich to the east, across the River Thames.

TRANSPORT ROUTES

3.9 The nearest station to the Site is the Emirates Air Line northern terminus, which is located 220m to the north-east of the Site. Numerous
other stations forming part of the DLR network lie in proximity to the Site, including East India, Canning Town, Royal Victoria (the nearest, at approximately 340m to the north-east), West Silvertown (also nearby, at approximately 360m to the east), and Custom House. The latter will also form part of the Crossrail route.

3.10 The A1020, which defines the north-eastern boundary of the Site facilitates access to both London City Airport (in the east) and connects with the A1011, the A13 and the A1203, all of which are key thoroughfares within east London.

3.11 There are no PRoW within the Site or the immediate vicinity given the urban context. The nearest promoted path is the Thames Path, which follows the course of the River Thames along its southern banks.

3.12 The North Greenwich Pier, providing River Bus services, is located on the opposing foreshore to the Site across the River Thames. Generally though, despite the widespread availability of different transport connection options in the vicinity of the Site, it is somewhat cut-off/severed from the wider townscape, lacking permeability.
Heritage Assets

Historical Development

3.13 Originally a marshy fen-land, London Borough of Newham’s historical development owes much to the mid 1800s, whereby new railway lines extending from London into Essex strongly dictated the urban form of the borough. Development followed the course of the railway lines, with large detached houses and rows of terraced houses commonly located in proximity to the newly introduced stations.

3.14 With the railways also came the substantial expansion of riverside wharves and docks, facilitating heavy industry and shipping-related activity. However, bombing during World War II decimated the industrial and dockside areas, and accordingly the majority of recognised historic assets are located in the northern part of the borough, away from the River Thames.

3.15 Following the end of the war, comprehensive redevelopment of large areas of Canning Town, West Ham and North Woolwich progressed, culminating in the provision of large residential areas predominantly two storeys in height. More modern industrial units were constructed within the dockside areas.

3.16 By the early 1980s the Royal Docks ceased trading; resulting in the clearance of former industry and warehouses, leaving fragments behind of this past land use. Since then, London City Airport was established, and new contemporary building blocks have begun to emerge in the area.
Listed Buildings

3.17 The Site is not subject to statutory listing. However, listed buildings do lie within the vicinity of the Site, with those nearest to the Site including the following:

- Trinity House Chain Locker and Lighthouse Blocks (Grade II), which lies approximately 110m to the west;
- Trinity House Buoy Wharf Quay and Orchard Dry Dock (Grade II), which lies approximately 160m to the west;
- Blackwall Pier and Entrance Lock to Former East India Dock Basin (Grade II), which lies approximately 450m to the west;
- Stothert and Pitt Cranes on North and South Sides of the Royal Victoria Dock (Grade II), which lies approximately 170m to the east;
- Silvertown War Memorial (Grade II), which lies approximately 880m to the south-east;
- Silo D (Grade II), which lies approximately 810m to the east; and
- Church of St Luke (Grade II), which lies approximately 330m to the north.

3.18 As outlined previously, there are few recognised heritage assets in the southern part of the London Borough of Newham due to the bombing runs that occurred during the Second World War. However, the Hallsville Tavern; the Compressor House on Ruscoe Road; the Flying Angel; the Millennium Mill at Pontoon Dock; and the Harland and Wolff Gates at Lyle Park are all identified as locally listed buildings within the wider surroundings of the Site.

Scheduled Monuments

3.19 There are no scheduled monuments within the vicinity of the Site.

Conservation Areas

3.20 The Site is not located within a conservation area, however the following lie within the wider context of the Site:

- Naval Row conservation area; and
- Coldharbour conservation area.

3.21 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special attention be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of conservation areas.

3.22 The Naval Row conservation area lies approximately 800m to the west of the Site and comprises the surviving structures associated with an historic port and shipbuilding activities dating from the 19th century, retaining a maritime character.

3.23 The Coldharbour conservation area lies approximately 1.2km to the south-west of the Site on the eastern side of the Isle of Dogs and survives as one of the last examples of the narrow streets that once characterised the River Thames' perimeter. Coldharbour conservation area safeguards two historic ship entrances to the original West India Basin and to Blackwall Reach and is almost predominantly residential in use but preserves a maritime character.
SITE CONTEXT

Topography Plan

LEGEND

- Red: River Thames
- Blue: Existing Water Courses and Reserves
- Brown: Contours (Metres AOD)

Elevations:
- 45 to 55
- 30 to 45
- 25 to 30
- 15 to 25
- 10 to 15
- 5 to 10

NOTES:

This plan is an approximate representation only, in which all areas are likely to be subject to minor variations in terms of elevation and position.
3.24 As demonstrated by the accompanying Topography Plan, the settlement pattern overlays a generally uniform low-lying landform ranging in height between -5m and 15m Above Ordnance Datum (AOD). South of the River Thames, the landform rises slightly more abruptly (albeit this is still a very gradual rise) towards Shooter’s Hill and Greenwich Park/Blackheath, which forms part of an extended ridgeline, to an elevation of approximately 60m AOD.

3.25 The Site is mainly defined by the built form (including the elevated DLR) and areas of hardstanding. However, there are some areas of substantial vegetation across the Site, including a number of tree species within the western and north-western parts of the Site, providing a degree of containment and compartmentalisation. Scrub vegetation also follows the course of the elevated DLR, while shrubs (and the occasional tree) run alongside Dock Lane and partially soften the appearance of the built form.

3.26 Within the wider area there are pocket parks and areas of amenity grassland and ornamental planting, such as at Lyle Park, the Thames Barrier Park and around the Crystal building; with street trees also a common feature within the residential street network. Larger tracts of vegetation are more commonly located south of the River Thames, such as at the Greenwich Peninsula Ecology Park; Greenwich Park; and Maryon Park.
CHARACTER ANALYSIS
4. NATIONAL CHARACTER

4.1 As part of Natural England’s responsibilities in delivering the Natural Environment White Paper, Biodiversity 2020 and the European Landscape Convention, Natural England has developed a series of National Character Area (NCA) Profiles.

4.2 These NCA Profiles provide a broad range of information including an outline of the key characteristics of a given area; a description of the ecosystem services provided and how they relate to people, wildlife and the economy; and they identify an array of opportunities for positive environmental change.

4.3 The Site lies within the NCA Profile 81: Greater Thames Estuary. The key characteristics of this NCA Profile are outlined as follows:

• “Predominantly flat, low-lying coastal landscape where extensive open spaces are dominated by the sky, and the pervasive presence of water and numerous coastal estuaries extend the maritime influence far inland...;”

• Distinctive landmarks of coastal military heritage including Napoleonic military defences, forts and 20th century pillboxes...;

• Highly urbanised areas within London and on marsh edges subject to chaotic activity of various major developments...; and

• Increasing development pressures around major settlements and especially towards London, with urban, industrial and recreational sites often high visible within the low-lying marshes.”
A | Canvey Wick SSSI, Essex
B | Canary Wharf, East London
C | Queen Elizabeth II Bridge, Rainham Marshes
D | Northward Hill RSPB Reserve, Canvey Island
E | Brent Geese over reclaimed arable farmland
F | Isle of Grain, Kent
G | Darnet Fort, Medway

* Images on this page © Natural England
5. REGIONAL CHARACTER

5.1 In addition, Natural England commissioned Alan Baxter and Associates LLP to prepare a report entitled ‘London’s Natural Signatures: The London Regional Landscape Framework’ in 2009, which was published in January 2011. The document sets out the Natural Landscape Areas and their ‘Natural Signatures’ that comprise the urban area of London.

5.2 Within this document, the Site is identified within Natural Landscape Area 14: Lower Thames Floodplain. However, this document focuses on London’s green spaces and natural character and does not provide detail on the urban character of specific areas.

5.3 The Lower Thames Floodplain Natural Landscape Area is described as follows:

“The Lower Thames Floodplain Natural Landscape Area covers the tidal Thames and its associated floodplain from Battersea in the west to Rainham Marshes and Crayford Marshes in the east. As the river flows east from Battersea it takes on more of the character of an estuary as it reaches Rainham and Crayford Marshes. The Area’s boundaries coincide with the wide band of alluvium, which has been laid down by the river over thousands of years, and which has created a broad, level corridor of around 3.5km width through the heart of the city...

In general, the gravel terraces to the north of the floodplain rise less abruptly than those to the south, where a ridge formed by more resistant bedrock (where the gravelly sands and clays of the Lambeth Group are capped by the pebbly beds of the Harwich Formation) provides some fine views over the Thames, including the famous view from Greenwich Park.

Low-lying and prone to flooding, this area of the floodplain would have comprised intertidal saltmarsh, unsuitable for human settlement, though an important resource for grazing. The desire to make use of this resource led, from the 19th century onwards, to the construction of a simple flood defence system of river walls...
backed by networks of drainage ditches. Remnants of this system survive today at Rainham Marshes.

The other influence on the development of the Lower Thames Floodplain Natural Landscape Area was the function of the Thames as the principal artery for trade...Deeper quays and, increasingly, large docks were required to handle London’s river traffic...such as those in the meander of the Isle of Dogs or, further down, the Royal Docks. The creation of the London

Docks and their subsequent transformation into Docklands have had a significant impact on this landscape.

Associated with docks came industry which both filled in the spaces between the docks...

Aside from the floodplain, the foreshore and areas of land away from the river are dotted with green features that continue to offer vital natural assets and views.”
6. LOCAL CHARACTER

EXISTING BASELINE CONTEXT

6.1 A townscape character assessment of the London Borough of Newham Council was published in September 2011, which outlines a series of character typologies and character areas across the borough and identifies how these relate to different parts of the borough contributing to local distinctiveness.

6.2 The Site is identified within the ‘Industrial land (older concentrations of industry)’ typology, which is described as follows:

- “Agglomeration of smaller enterprises including small scale manufacturing, waste management, off-site construction and storage, scrap recycling, car maintenance and distribution of building materials;
- Apparently random collection of buildings and yards of varying design and scale;
- Some older industrial buildings may be listed or worthy of protection; or
- Older large-scale manufacturing plants, such as Tate and Lyle’s sugar factory.”

6.3 Specifically relating to the Site, it states:

“A jumble of industrial uses some of which use river transport.”

6.4 It is also noted that this typology has an “untidy appearance” and that it is a “cluttered townscape”.

6.5 The Site is also identified within the much wider Royal Docks character area, which is described as follows:

- “Significant impacts of roads, railways, docks and river - development squeezed and over-extended in linear comb-like formation, lacking central focal points;
- Significant, but underutilised open spaces along the Dock sides, Thames, (Barrier Park, Royal Victoria Gardens, Lyle Park), limited pocket parks in North Woolwich;
- Poor permeability and legibility in most parts - several isolated residential enclaves have been created through poor integration with existing neighbourhoods, and whilst segregated pedestrian/cycling routes contribute to permeability, they are isolated and not overlooked, with safety/security implications, especially at night; and
- Absence of clear composition of development, leading to fragmentation of many typologies and associated routes.”

6.6 To provide a finer grain of detail over and above the detail provided in the Newham Character Study, the following local Townscape Character Areas (TCAs) have been identified by BWLPD, and summarised at a high-level, to facilitate a better understanding of the context within which the Site lies, while their extent and distribution is illustrated in the following plan overleaf.
EXISTING TOWNSCAPE CHARACTER AREAS

Poplar Suburbs (TCA 1)
- Predominantly a residential area, with the building typology exhibiting substantial contrasts in vernacular and scale; and
- Area partially severed by the main thoroughfares of the A13 and the A312.

Leamouth and Thames Estuary (TCA 2)
- Predominantly industrial uses, adjacent to the River Lea and River Thames. Generally poor and cluttered appearance; and
- Built form of variable height, mostly low-rise although some high-rise development on the Leamouth Peninsula.

Canning Town and Custom House (TCA 3)
- Predominantly residential, comprising post-war two to three storey built forms; and
- Simple and uniform area, with built form arranged across disconnected but repetitive street pattern.

Royal Victoria Dock (TCA 4)
- The expanse of open water is the defining characteristic of the area, with mixed-use developments predominating; and
- Distinctive built forms, including Millennium Mills, the Excel Centre, and the Crystal.

West Silvertown (TCA 5)
- Predominantly residential, comprising low-rise flats and houses between three and five storeys; and
- Broadly regular/geometric grid pattern urban structure, incorporating car parking and small pockets of amenity space.

Minoco Wharf (TCA 6)
- Much of the area is currently undergoing construction activities, with some mid-rise residential built form completed; and
- Elsewhere there are industrial uses present, while the Thames Barrier Park is a key feature.

Canary Wharf and Docklands (TCA 7)
- Land use is predominantly commercial/office, with the built form tall and centered around a series of wharfs; and
- The built form is modern and contemporary, with a strong sense of place. Some construction activities are ongoing.

Isle of Dogs (TCA 8)
- Predominantly residential area with built form generally four to six storeys in height; and
- Street pattern largely orientated towards the River, with a large area of open space in the centre.

Greenwich Peninsula West (TCA 9)
- Predominantly industrial land use, with views of Canary Wharf and the O2 Arena a defining characteristic; and
- Some large scale built form, set against swathes of open/vacant land.

Greenwich Peninsula East (TCA 10)
- Mixed-use contemporary development, featuring the landmark O2 Arena to the north; and
- Built form is generally tall and of a large scale, with substantial construction activities also ongoing in the area.

New Charlton (TCA 11)
- Industrial area, with a number of loading jetties extending into the River Thames and
- Warehouses are commonplace, as are spoil heaps associated with aggregate materials.
FUTURE BASELINE CONTEXT

6.7 As previously outlined, the Site lies within the Royal Docks and Beckton Riverside Opportunity Area, which will see the development and regeneration of the surrounding townscape. In addition, there are numerous committed or ongoing developments elsewhere within the surrounding townscape. The following have been identified as nearby committed and/or emerging developments that are likely to alter the future townscape context to the Site:

• Redevelopment of Minoco Wharf (11/00856/OUT), which lies to the south-east of the Site. Proposals include a residential-led masterplan, subdivided into 26 plots up to a maximum building height of 65m AOD to deliver 3,385 new homes;

• Redevelopment of Silvertown Quays (14/01605/OUT), which lies to the east of the Site. Proposals include a mixed-use development, incorporating the conversion of the Millennium Mills building and the construction of new built forms up to a maximum building height of 44.9m AOD, complemented by the provision of public open space;

• Redevelopment of Good Luck Hope (PA/14/03594/A1), which lies to the west of the Site and includes built form up to 30 storeys in height;

• Redevelopment of Leamouth Peninsula North (‘City Island’) (PA/10/01864), which lies to the north-west of the Site. Proposals include a mixed-use residential led development with built form rising up to 30 storeys in height;

• Redevelopment of Brunell Street Works (16/03428/FUL), which lies to the north of the Site and includes built form up to 28 storeys in height;

• Redevelopment of Wood Wharf (PA/13/02966), which lies to the west of the Site. Proposals include a mixed-use development comprising a series of towers varying in height up to 60 storeys;

• Redevelopment of Greenwich Peninsula (15/0716/O), which lies to the south of the Site. Proposals include a mixed-use development set over a series of high-rise built forms up to a maximum building height of 133.5m AOD;

• The creation of a new Thames Wharf DLR station within a central part of the Site; and

• The Silvertown Tunnel DCO, for which the Planning Inspectorate issued a report of recommendation to the Secretary of State.

6.8 The future townscape character for the surrounding area has been considered and is informed by the nearby development proposals outlined previously. In this regard the immediate context of the Site will feature a number of development blocks of varying mass, form and scale, which are generally taller than the existing built form in the surroundings.

6.9 A description of the previously identified character areas in the vicinity of the Site, taking into account the identified committed and/or emerging developments is provided on the adjacent page. In addition, an indication of the future building heights and layout of built form within the vicinity of the Site is provided overleaf.
FUTURE TOWNSCAPE CHARACTER AREAS

Poplar Suburbs (TCA 1)

- Predominantly a residential area, with the building typology exhibiting substantial contrasts in vernacular and scale; and
- Area partially severed by the main thoroughfares of the A13 and the A312.

Leamouth and Thames Estuary (TCA 2)

- A mix of industrial and residential uses, adjacent to the River Lea and River Thames; and
- Built form of variable height, mostly low-rise although some high-rise development on the Leamouth Peninsula extending to 30 storeys.

Canning Town and Custom House (TCA 3)

- Predominantly residential, comprising post-war two to three storey built forms; and
- Simple and uniform area, with built form arranged across disconnected but repetitive street pattern.

Royal Victoria Dock (TCA 4)

- The expanse of open water is the defining characteristic of the area, with mixed-use developments predominating; and
- Distinctive built forms, including the renovated Millennium Mills, the Excel Centre, and the Crystal.

West Silvertown (TCA 5)

- Predominantly residential, comprising low-rise flats and houses between three and five storeys; and
- Broadly regular/geometric grid pattern urban structure, incorporating car parking and small pockets of amenity space.

Minoco Wharf (TCA 6)

- A predominantly modern contemporary residential area, with built form predominantly mid to high-rise, including the distinctive Marco Polo building; and
- Elsewhere there are industrial uses present, while the Thames Barrier Park is a key feature.

Canary Wharf and Docklands (TCA 7)

- Land use is predominantly commercial/office, with the built form tall and centered around a series of wharfs;
- The built form is modern and contemporary, with a strong sense of place, including the new Wood Wharf.

Isle of Dogs (TCA 8)

- Predominantly residential area with built form generally four to six storeys in height; and
- Street pattern largely orientated towards the River, with a large area of open space in the centre.

Greenwich Peninsula West (TCA 9)

- A mix of uses, but predominantly residential and commercial. Views of Canary Wharf and the O2 Arena is a defining characteristic; and
- Some large scale built form, set amongst pocket amenity spaces.

Greenwich Peninsula East (TCA 10)

- Mixed-use contemporary development, featuring the landmark O2 Arena to the north; and
- Built form is generally tall and of a large scale, with numerous modern and contemporary residential towers and areas of public open amenity space.

New Charlton (TCA 11)

- Industrial area, with a number of loading jetties extending into the River Thames and
- Warehouses are commonplace, as are spoil heaps associated with aggregate materials.
VIEW ANALYSIS
7. VISUAL APPRAISAL

7.1 A series of photographs were taken in early December 2017 from a range of locations to demonstrate the character and appearance of the surroundings within which the Site lies. These photographs were taken from areas to which the public readily gain access i.e. along roads and pavements and within areas of publicly accessible open space.

7.2 The viewpoints elected are not intended to be an exhaustive list of where views towards the Site may be obtained, but rather are selected as representative key views of visual receptor groups towards the Site, of varying distance, orientation and composition.

7.3 As demonstrated in Viewpoints 1 - 12, the built vernacular surrounding the Site is varied, exhibiting contrasting use, materiality, scale, massing, and detailing. A common element of the views towards the Site is the presence and influence of open expanses of water, which in turns allows for generally uninterrupted views of the Site. Inevitably, the regeneration of the Site is therefore likely to be clearly visible and will therefore need to take design cues from the surrounding area to integrate with its context.

7.4 It is of note that there are a number of large scale built forms in the surrounding townscape, while there are also vast swathes of land currently undergoing intensive construction activities, which once complemented will further amplify the high-rise character of the surroundings. The Site also currently forms part of the setting to a number of landmarks, including the Crystal building; the O2 Arena; Canary Wharf; and, once completed, the Marco Polo building.
Sources:

OS Mapping
Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

Sites:

Existing Woodlands, Copses and Tree Belts
Existing Scrub
Existing Water Courses and Features
Contours/Spot Heights (Metres AOD)
Location of Photographic Viewpoints

Legend

N

Viewpoint Location Plan

BARTON WILLMORE
VIEWPOINT 2

This viewpoint is located on the West Silvertown DLR platform and is orientated to the north-west. The foreground of the view features the train track that extends into the background of the view, alongside which there industrial development to the left.

The elevated Emirates Air Line passes over the track. Residential development is visible to the right, which rises to approximately 20 storeys in height. The O2 Arena is partially visible in the distance, adjacent to which there are ongoing construction activities on the peninsula. The distinctive profile of Canary Wharf forms the backdrop to the view. The development proposals would be clearly visible from this location. However, built form over 15 storeys high within the Site would not be uncharacteristic given the presence of other tall buildings framing the Site and in the distance.
VIEWPOINT 1

This viewpoint is located within the Thames Barrier Park and is orientated towards the north-west. The foreground of the view comprises amenity grassland, which extends into the background of the view towards the ongoing/partially completed construction activities associated with the regeneration of the Minoco Wharf.

Depending on the overall height and scale of the development proposals, they will not be visible in the backdrop of the view obtained, and therefore are unlikely to disrupt any views towards recognised landmarks, including the as-yet un-built Marco Polo building. The view demonstrates that built form over 15 storeys high will not likely be visible from this location.
VIEWPOINT 4

This viewpoint is located adjacent to the Royal Victoria Dock, the open water of which expands from the foreground into the background of the view. The O2 Arena is visible in the backdrop, as is the distinctive profile of Canary Wharf.

Closer to the viewer, the Crystal building partially truncates views of Canary Wharf, while an approximately 12 storey residential built form partially truncates views of the ongoing construction activities on Greenwich Peninsula. The development proposals would likely obscure views of the O2 Arena. However, through the careful consideration of layout, views through to this landmark could be retained. The view also demonstrates that built form over 15 storeys in height would not necessarily be of such a scale to be perceived as being out of place.
VIEWPOINT 3

This viewpoint is located on the Royal Victoria Bridge and is orientated to the west. The open expanse of water of Royal Victoria Dock lies below, which is bordered by 5 storey residential development to the left and approximately 15 storey commercial development to the right.

Canary Wharf and the O2 Arena are visible in the backdrop of the view, in front of which the Emirates Air Line is visible. The development would likely be clearly visible from this location, but depending on their overall height, scale and layout, need not disrupt views of the distinctive profile of Canary Wharf nor the tall built form within the City of London that is discernible in the backdrop of the view. The view demonstrates that built form over 15 storeys high within the Site would be perceptibly comparable to the other built form framing the Royal Docks.
VIEWPOINT 6

This viewpoint is located on the elevated A1011 and is orientated to the south-east. The northern part of the Site, comprising industrial and storage facility land uses, is clearly visible below the viewer to the right, beyond which the O2 Arena and part of Canary Wharf is visible in the backdrop.

Construction activities on Greenwich Peninsula are also visible, with the Emirates Air Line towers of a noticeably greater scale. Tall built forms are also visible to the left of the view.

The development proposals would likely curtail visibility of the O2 Arena, but depending on layout, may focus views towards the as yet unbuilt Marco Polo building in the distance.
VIEWPOINT 5

This viewpoint is also located adjacent to Royal Victoria Dock, with the terminus for the Emirates Air Line forming the main focus to the view.

Approximately 20 storey residential built form is visible to the right, while approximately 12 storey residential development is visible to the left. The Crystal building is visible behind the terminus, beyond which construction activities on Greenwich Peninsula are visible in the background of the view.

The development proposals would likely be clearly visible, although they would not disrupt views to any recognised landmarks. The view demonstrates that built form over 15 storeys high within the Site would be comparable in height to the other built form in the vicinity of the Royal Docks.
VIEW ANALYSIS

VIEWPOINT 8

This viewpoint is located on the eastern edge of Canary Wharf overlooking Blackwell Basin. Large scale built form adjacent to the water-edge is a defining characteristic of the view, with visibility of the O2 Arena also obtained from this location (adjacent to which, construction activities on Greenwich Peninsula are visible).

Depending on the overall scale and height of the development proposals, they are unlikely to be visible from this location due to the screening afforded by the intervening built form.

Nonetheless, should they be visible, they would likely form a very small component of the view as demonstrated in the illustrative view.
VIEWPOINT 7

This viewpoint is located on the Lower Lea Crossing A1020 overbridge, with the River Lea visible below, which is physically and visibly separated from the River Thames by Trinity Buoy Wharf.

The O2 Arena and ongoing construction activities are visible on Greenwich Peninsula, beyond the River Thames. To the left of the view, high-rise development in proximity to the Royal Docks is visible, while the Emirates Air Line connects these two areas together.

The development proposals will likely be clearly visible in the background of the view, although depending on the layout views through to the as yet unbuilt Marco Polo building may be retained. The view demonstrates that built form over 15 storeys high within the Site could help define and emphasise the conflux between the River Lea and the River Thames.
VIEWPOINT 10

This viewpoint is located on the Thames Path in proximity to Emirates Air Line terminus, with the view orientated to the north. The Emirates Air Line towers draw the viewers’ eye and form the main focus of the view.

Construction activities on Greenwich Peninsula are visible to the left, as is the distinctive profile of Canary Wharf in the distance. Across the River Thames, built form in proximity to the northern banks and Royal Docks is clearly visible, as are the ongoing construction activities at Minoco Wharf.

The development proposals would be clearly visible from this location, although they would not interrupt views towards the as yet unbuilt Marco Polo building, with the view also demonstrating that built form over 15 storeys high within the Site would foreshorten views towards existing high rise development.
VIEWPOINT 9

This viewpoint is located on the Thames Path adjacent to the O2 Arena, with the view orientated to the north-east. The River Thames occupies the majority of the view, offering uninterrupted views towards the Site and the northern banks of the River Thames.

The towers of the Emirates Air Line draw the viewers’ eye, as does the high-rise development in proximity to Royal Victoria Dock in the backdrop of the view.

As shown in the view, the development proposals would be clearly visible from this location, although they would not interrupt views towards the as yet unbuilt Marco Polo building.
VIEWPOINT 12

This viewpoint is located at the Greenwich Observatory, which is a designated viewpoint within the London View Management Framework (Assessment Point 5A.1).

The foreground of the view features the formal park as it descends the slope towards Greenwich town centre. To the left, the City of London is visible in distance, while in the centre of the view lies Canary Wharf. To the right of the view, outside the Protected Vista, the O2 Arena is visible.

Depending on the ultimate scale and distribution of the development proposals, they may be visible to the right of the view, filtered through vegetation, beyond the O2 Arena and in proximity to the existing high-rise development visible in this part of the view.
VIEWPOINT 11

This viewpoint is again located on the Thames Path, with the view orientated to the north-west. The expansive and open water of the River Thames allows for uninterrupted views towards the partially completed/ongoing construction activities of Minoco Wharf. Construction activities are also visible to the left of the view on Greenwich Peninsula, which partially obstruct views of Canary Wharf. Industrial built form within the Site is visible, but is not immediately apparent.

The development proposals would likely be visible from this location, although the as yet unbuilt Marco Polo building would likely be the main focus of the view due to its location at the apex of the bank of the River. As demonstrated in the illustrative view, built form over 15 storeys high within the Site would likely be subservient to the other built form within the view.
DESIGN RATIONALE
8. SCOPE FOR DEVELOPMENT

LANDSCAPE / TOWNSCAPE GUIDELINES

**National Guidelines**

8.1 With respect to the Greater Thames Estuary NCA Profile [81], the following Statement of Environmental Opportunity of relevance to the Site and the Proposed Development is provided:

“SEO 4: Encourage a strategic approach to development that is informed by and makes a positive contribution to local character, incorporates green infrastructure which provides ecosystem services where they are needed most, and promotes recreation and addresses climate change, while maintaining important open mosaic and coastal habitats, and historic and geological features.”

**Regional Guidelines**

8.2 The following ideas for future place-making within the Lower Thames Floodplain Natural Landscape Area are provided:

- Embankments, stepped terraces and viewing mounds as a contract to larger scale, open marshes;
- No hedgerows, fences or upstanding boundaries;
- Wet scapes, ponds, swales and ditches surrounded by open wet grasslands; and
- Incorporate industrial archaeology within the public realm - as seats, signs and structures for adventure play or artworks…”

**Local Guidelines**

8.3 A series of design clues are provided within the Newham Character Study, which states that new development could emulate the below:

- “Introducing iconic and innovative / imaginative design styles with good consideration of local context and composition in terms of rhythm, height and massing...”;
- Apply urban design principles consistently, paying particular attention to visual composition, legibility and integrates with neighbouring buildings, streets and areas that creates permeability...; and
- Improving the public realm on main streets to encourage development to address major streets rather than turn inwards...”

8.4 The following design principles are provided in relation to Tall Buildings:

- “Focus: tall than normal buildings are more appropriate along major roads where they are key public transport routes, at public transport nodes and in town centres or other important destinations rather than scattered within the urban grain;
- Existing tall buildings: a tall building may not be appropriate simply because other tall buildings currently exist in the locality, as many of these are poorly integrated with the local context;
• **Masterplanning**: a key means to achieve coherence and mitigation of impacts (including negative impacts on microclimate) will be the masterplanning of large development sites/areas where tall buildings are otherwise appropriate;

• **Composition and legibility**: not all tall buildings should be iconic or the same height – overall composition and legibility is important, and clustering and staggering of heights around an important focal/activity point can help achieve this;

• **Retrospective mitigation**: in areas where piecemeal tall buildings development has occurred, it may be appropriate to seek to raise the average height of buildings on the street to maintain enclosure...;

• **Active ground floor uses and streets**: tall buildings like other buildings need to provide for active ground floor frontages and the formation of animated streets and external spaces...;

• **Amenity space**: innovative means of incorporating amenity space may be required, including roof top community gardens, large balconies, and flexible public open space at the base of towers...; and

• **Alternative high density formations**: similar densities can be achieved at lower heights...”

8.5 In relation to sensitivity and capacity to absorb new development it is noted that:

“...the areas that have most straightforward capacity for innovation are generally those where there are large development sites providing the space and spacing to enable comprehensive master-planning, and absorb well-conceived departures in various dimensions from patterns evident elsewhere in the area (for example significantly taller buildings). In Newham, this equates to most of the Arc of Opportunity...”

8.6 Specifically relating to the southern part of the borough, including the Royal Docks, the following priorities are identified:

• “Enhance or provide new street-based local centres...including public realm improvement;

• Address the poorly connected street network and major barriers...and missing links between development sites to improve permeability and legibility;

• Consider the potential to provide active frontages and streets facing onto parks, together with cycle routes through and connected with parks and open spaces to animate and overlook the spaces...; and

• Realise the potential of attractive waterside locations, ensuring access for all, and creating/maintaining key through views...”
OPPORTUNITIES FOR DEVELOPMENT

8.7 Based on the findings of the townscape and visual baseline analysis, the Site is considered to provide the following opportunities for development:

• The Site is identified within the Royal Docks and Beckton Riverside ‘Opportunity Area’ within the London Plan;

• Consistent with the Newham Character Study, the large scale of the Site in combination with its location within the ‘Arc of Opportunity’ means that there is a greater capacity to absorb the type of development proposed;

• The Site offers the potential to contribute to the overall urban greening of the area through the provision of a high quality landscaping scheme, while its location adjacent to the watercourses means that there is the potential to improve access to the blue infrastructure network;

• The Site is not covered by any national, regional or local landscape/townscape designations;

• The Site does not lie within any protected viewing corridors as identified in the LVMF;

• There is the potential to accommodate high-density multiple land uses as per the Mayoral vision in the City For All Londoners;

• The Site comprises previously developed land, which is in a poor state of repair. The public realm is poorly defined and diminishes the visual amenity experience;

• There is some existing vegetation structure within the Site, which could be incorporated within the design of the scheme to aid in integrating development and form part of an enhanced public realm offering while contributing to green infrastructure linkages;

• The Site is positioned at a unique location in the townscape, lying at the confluence of the River Lea and River Thames; in the setting of Canary Wharf and Greenwich Peninsula; in proximity to ongoing regeneration in the Opportunity Area and ‘Arc of Opportunity’; and corresponding with the location of a proposed new DLR station and the proposed Silvertown Tunnel;

• West Silvertown / the Royal Docks is already typified by built form of varying scale and mass, while the Sites’ location adjacent to a proposed new DLR station provides the opportunity for the introduction of tall built forms to contribute to legibility and create a new local centre; and

• Redevelopment of the Site allows for the opportunity to introduce iconic and innovative design, with the overall scale of the Site meaning that there is the potential to provide a comprehensively planned area of waterfront development that ties in with the surrounding emerging land uses (addressing and improving legibility and permeability), while also appropriately defining its own distinct character and sense of place at a human and strategic scale.
8.8 Development of the Site could respond positively to the stated aims of the NPPF in contributing to the enhancement of the built environment and the NPPF Core Principles, by improving the places in which people live and the effective re-use of land that has previously been developed.

8.9 Sensitively approached development within the Site could ensure the delivery of good design and create a strong sense of place and add to the overall quality of the area, creating and attractive and comfortable place to live, work and visit while reinforcing local distinctiveness.

8.10 Development of the Site could also respond positively to the London Plan in promoting green infrastructure as part of the design, as well as urban greening through landscaping in both publicly accessible and private areas. Similarly, this type of substantial regeneration could respond positively to Policies 7.6 and 7.7 of the London Plan, particularly through the introduction of high quality architecture and materiality that relates well to the surroundings, and the introduced built form could improve the legibility and permeability of the area.

8.11 Further to the ways in which development of the Site could respond positively to the NPPF and London Plan, its’ redevelopment could respond positively to the policies set out in the London Borough of Newham Core Strategy DPD, and the Detailed Sites and Policies DPD. The Site offers the potential to enhance the character of the neighbourhood while aligning to the vision of the Core Strategy, capitalising on investment in the ‘Arc of Opportunity’.

CONSTRAINTS FOR DEVELOPMENT

8.12 Nonetheless, there are some constraints to development of the Site from a townscape and visual perspective, which include:

- The Site is in a low lying position and is adjacent to the waterfront, as such it is visible from close range locations and longer range elevated locations in the surrounding townscape; as well as being visible across the open and expansive waterbodies. However, sensitive massing of introduced built form can respond positively to the existing visual amenity and improve the composition of the available views;

- The Site also lies in the setting and/or direct viewing corridor of a series of well-known landmarks and skylines, including Canary Wharf; the O2 Arena; the Crystal building; and the as yet unbuilt Marco Polo building. However, through a sympathetic layout and massing arrangement of the introduced built form, the views towards these landmarks and skylines could be complemented rather than compromised;

- Existing infrastructure lies within the Site, including the elevated DLR and the Emirates Air Line, while future planned infrastructure including a new DLR station and the Silvertown Tunnel correspond with the Sites’ location. However, these elements could be incorporated within the design and layout of the introduced built form; and

- The type of development proposed would likely represent a marked change to the character of the Site and its locality.
DESIGN RATIONALE

9. MITIGATION-BY-DESIGN RATIONALE

Contribute Positively to Townscape Character and Local Distinctiveness

The layout, massing and overall scale of the introduced built form should draw on the positive examples within the surrounding townscape, responding positively to both the existing and emerging context. The form of the introduced built form should enable a reduction in its perceived massing and bulk through appropriate facade detailing and sympathetic materiality. The design should attempt to create a distinctive sense of place and improve connections and interactions with the surrounding area while introducing high quality architecture into the area.

Strengthen the Green Infrastructure Network

Retain quality existing trees and introduce new tree planting and ornamental planting as part of a multifunctional green space network as well as to provide visual interest and soften the appearance of the introduced built form. Green infrastructure linkages should be incorporated within the Site, improving its permeability; biodiversity value; and visual amenity interest. A new publicly accessible park should be incorporated within the design.

Integrate with and Enhance the Blue Ribbon Network

The introduced built form should be set back from the waterway, allowing the built form to more sympathetically integrate with the waterside environment. Access to the waterside environment should be enhanced, incorporating walking, cycling and recreation routes that are overlooked by the introduced built form, thereby providing passive surveillance. Waterside ecology should also be improved. Physical and visual permeability through the Site towards the River should be incorporated in the layout of the development, maintaining and creating new views towards landmarks.
Enhance the Skyline and Contribute Positively to the Legibility of the Townscape

It is essential that the layout, massing and height of the introduced built form enhances the skyline and assists in wayfinding, thereby contributing positively to legibility. Variation in the height of the introduced built forms should be achieved, gradually stepping up in height and culminating in proximity to the new DLR station in the western part of the site. So as to not read as one large area of tall buildings, two distinct clusters should be provided within the site, either side of the proposed Silvertown Tunnel, with the easternmost cluster of a comparatively reduced height.

Intensify Development and Create a New Local Centre

Redevelopment of this large strategic site should capitalise on its location within the ‘Arc of Opportunity’ and its proximity to the proposed DLR station and Silvertown Tunnel. The introduced built form should be of a high density, helping to mark a new local centre/focal point in the townscape, while delivering a range of benefits to the neighbourhood and local community, emphasising its strategic function as a new local centre in the townscape.

Enhance the Public Realm and Visual Amenity Experience

The introduced built form should be articulated and detailed in a manner that complements the surroundings, while simultaneously providing visual interest that is sympathetic to the other nearby emerging schemes. Public and private spaces should be clearly distinguished, while ensuring that these spaces are overlooked to promote a safe neighbourhood. At the streetscape level, uniform building lines would help define the area of public realm, with a finer grain of detail provided in the facades at ground floor. Materiality should not be monotonous, avoiding a homogenous response.
DESIGN RATIONALE

Site Boundary
Developed Area
Greenspace
Green Infrastructure Corridor
Connections to Wider Area
Permeability to Waterside Environment
Emirates Air Line
Silvertown Tunnel
DLR / New DLR Station
Cluster of High-Rise Development
Focus for high-rise development in this part of the Site, **emphasising the location of a new key focal point in the townscape**, both at a local and strategic scale. **Capacity to accommodate significantly taller built form** than the immediate surroundings, providing a sense of balance between the other existing and emerging high-rise development at Canary Wharf and on the Greenwich Peninsula while also **assisting in legibility and wayfinding**. Opportunity for the layout of introduced built form to channel views through and towards the as yet unbuilt Marco Polo building to amplify its function in the townscape.

To take advantage of the constraints presented by both the Emirates Air Line and the Silvertown Tunnel there is the potential to **incorporate a strong green infrastructure link / linear park** through the Site that would provide relief from the built-up nature of the townscape in addition to the benefits arising from **increased accessibility; physical and visual permeability; and ecological improvements**.

A secondary high-rise cluster to be provided that is physically (in terms of scale) and perceptibly subordinate to the main cluster that coincides with the location of the new DLR station. A step up in scale/height is appropriate in this location to **reflect the modulating rhythm of the townscape and built form** along the course of the River Thames east of London, thereby appropriately **tying-in with the other emerging schemes** further east, including the as yet unbuilt Marco Polo building.

Ensure that physical and visual permeability is provided within the layout of the introduced built form, **facilitating access to the waterside environment** and creating new vistas through the Site and across the River Thames that reflects the townscape grain / street pattern of the surrounding area. Regular spacing between the introduced built form could be incorporated to provide a sense of rhythm in the townscape, while building heights could be arranged so as to provide a **visually pleasing cadence in views from across the River that also assists in legibility**. The flow and lilt of the built form across the panorama would accentuate the distinctiveness of the as yet unbuilt Marco Polo building on the apex of the curve in the River Thames and at the Leamouth North Peninsula.
REG 19 CONSULTATION
NEWHAM CHARACTER STUDY, DECEMBER 2017

10.1 The Newham Character Study was published in December 2017 and builds upon the townscape character assessment that was prepared by the Council and first published in September 2011.

10.2 Specifically, the Newham Character Study seeks to analyse Newham’s development canvas to understand the Newham-wide components of character; set out a series of design cues to guide development; and to help understand where and how taller buildings may be suitably located.

10.3 Provided up front within the Newham Character Study are a series of recommendations, with the following of utmost relevance to the Site:

1. A high priority should be given to design to help create successful places and sustainable communities...

5. Most innovation and the greatest degree of change should be directed to the Arc of Opportunity...;

6. Innovation in design should be recognised as an important mechanism to address the under-performance of assets to create sustainable regeneration...; and

7. A strategic approach to tall buildings, to be reflected in Core Strategy and more detailed policies and guidance, linked to good design practice and analysis of contextual capacity and sensitivity, should be advanced...

10.4 Within Chapter 1 it states that:

“Creating a place where people choose to live, work and stay is the key objective of Newham’s Sustainable Community Strategy. Good design, as required and promoted by national and London-wide policy is an essential component of this aim, and this document supports the design process by providing an analysis of Newham’s character...”

10.5 The methodology to undertake the character study is also set out in Chapter 1, noting that it has been primarily undertaken as a desk-based exercise.

10.6 Within Chapter 3, the distribution of typologies across the Borough is outlined, with seven distinct character areas also defined. The Site is identified within the Royal Docks area, which notes that “for the most part there is no obvious dominant typology”. The Royal Docks description does however recognise the presence of “Contemporary developments including walk-up flats of 4-6 storeys, towers of around 20 storeys, and 12-storey long blocks”. It is also noted that there “are no definable local centres”.

10.7 Chapter 4 is entitled Design Cues and “is intended to give an overview of quality and consequent design cues - a starting point for more detailed appraisal work in areas of change”.

10.8 Particular attention is given to ‘Tall Buildings’, noting that:
“In considering design cues for tall buildings, it is worthwhile to consider the positive aspects of tall buildings which make them an attractive development from several perspectives. Tall buildings offer the opportunity to build to higher densities around public transport nodes/key routes and in town centres, helping to support their viability and vitality...

Tall buildings can be excellent works of architecture...the introduction of a prominent visual feature into an existing townscape can change its character and appearance and present a better perceived ‘offer’ for the area to the rest of the borough and London: tall buildings can also be iconic buildings that define a strong sense of regeneration, economic vitality and status of place, creating new vistas and landmarks and helping to improve legibility by marking for instance, town centres and transport hubs. Tall buildings can thus play a role in creating successful places.”

10.9 Figure 3 of Chapter 4 illustrates the distribution/location of tall buildings across the London Borough of Newham.

10.10 Under the heading of ‘Existing tall buildings’ it is noted that “a tall building may not be appropriate simply because other tall buildings currently existing in the locality”, while under the heading of ‘Composition and legibility’ it states that:

“Not all tall buildings should be iconic or the same height - overall composition and legibility is important and clustering and staggering of heights around an important focal/activity point can help achieve this. This needs to include consideration of cross boundary spatial integration. Scale and clustering considerations should relate to a hierarchy of places (more and taller buildings in more important centres, and a clear distinction between centres and their hinterlands).”

10.11 The following priorities related to urban design principles for the Royal Docks area are then set out, which include:

- “Enhance or provide new street-based local centres, notably in North Woolwich, Silvertown and Thames Wharf, including public realm improvement;
- Address the poorly connected street network and missing links between development sites to improve permeability, legibility and accessibility to and along water fronts;
- Contribute to public transport improvements, including through DLR capacity improvements and new stations, and improved bus route penetration;
- Address the need to balance industry/employment space, traffic circulation needs, visitor attractions and residential space, and edges between them;
- Realise the potential of attractive waterside locations, ensuring access for all, and creating/maintaining key through views and
attending to flood risk without compromising ground floor activation and the need for focused centres;

- **Attention to scale, massing and composition** that reflects the status of the Royal Docks as one of the main growth areas of London, but also consider layout, quantum and use mix of development in relation to neighbouring sites and the successful functioning of the whole Royal Docks area;

- **Integrate parks into development** by providing active frontages and streets facing onto them, together with cycle routes to activate and connect open spaces and

- **Using the scale of development potential** as a lever to secure high sustainability standards across the area, with opportunities to share associated infrastructure (e.g. a district heat network).”

10.12 The Site is identified within Figure 6 as a ‘Key Area with Capacity for Change’.

10.13 Chapter 5 ‘Conclusions and Recommendations’ states in respect of Tall Buildings:

“The trend for tall buildings in the borough is growing as part of a London-wide pattern...a number of these development shave not been in ideal locations, but were justified by factors of design quality, proximity to public transport nodes and local character which already included tall buildings.”

10.14 The following strategy is then outlined:

“1. A preference for mid-rise densities (four to six storeys, 8 to 12 in the Arc) are generally preferred over tall standalone towers as the resulting built form reflects Newham’s prevailing norm...

2. A plan-led approach to tall buildings is adopted which identifies opportunities for tall buildings at specific locations in the borough, and which recognises the adopted hierarchy of town centres in the borough in defining appropriate scales and numbers of tall buildings. Broadly...:

iii) Taller buildings of up to 20 storeys (but typically around 8-12 storeys) should also be directed to other accessible locations within the Arc of Opportunity, where they will contribute to legibility and place-making objectives...;

v) An initial site based analysis should be provided to generate indicative heights and arrangements as part of Strategic Site allocations, taking into account the above and local historic context and character but also the degree of public transport accessibility, place hierarchy.

3. Emphasis of the role of master planning to secure comprehensive, composed development taking into account cumulative impacts and 3D modelling, CGI, BIM work and Design Review of detailed proposals...”

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**Review of Newham Character Study**

10.15 We consider that on the whole the Newham Character Study is generally a well-prepared document, albeit not without its limitations (not least that it has primarily been conceived without the benefit of site specific field surveys).

10.16 From the outset it is clear that the Newham Character Study supports design-led solutions for the redevelopment of areas, which is reflected...
in the recommendations set out within the first part of the Study. This approach, in tandem with the recommendation on a strategic approach to tall buildings, is considered to be consistent with both national and regional policy, as well as being reflected in the wording of Revised Policy SP3.

10.17 While the Newham Character Study recognises the need to “include consideration of cross boundary spatial integration”, Figure 3 fails to demonstrate the distribution of tall buildings within the immediate context of the Site within the adjoining boroughs, representing a serious flaw in the formation of the study. Furthermore, Figure 3 also fails to include the actual height of a number of tall buildings within the Arc of Opportunity (and immediately adjacent to the Site, such as the 23 and 24 storey Hoola towers), but rather states a height of “>18m, but actual height unknown”.

10.18 With respect to the urban design principles for the Royal Docks, the townscape and visual mitigation-by-design rationale set out within this Preliminary Townscape and Visual Appraisal demonstrates the way in which the introduction of buildings substantially taller than 15 storeys within the Site can achieve these aims.

10.19 The ‘Conclusions and Recommendations’ provide indicative heights in relation to the distribution of tall buildings. However, it is not clear how those in relation to the Site have been derived, with no evidence set out within the Newham Character Study to justify limiting buildings height in this locality.

10.20 Notably, Appendix 2 that supports the Newham Character Study does not place a limit on heights, but rather recognises that “riverside and dockside locations have a unique character which provides a focus for new development” and “separation from urban Newham by the docks gives opportunity for innovative approach to development to creative distinctive contemporary neighbourhoods building on proximity to river Thames”.

10.21 Furthermore it is noted that “Extensive dockside/riverside sites lend themselves to high quality masterplanning and introduction of a clear typology and composition of development, new character areas and improved connectivity and permeability” and “Large former industrial dockside and riverside sites large enough to be masterplanned to absorb innovation, including managing the effects of taller buildings”.

10.22 In this light, and when considering cross-boundary spatial integration; the Sites’ location within a ‘Key Area with Capacity for Change’; and its unique location at the confluence of the Lea and Thames adjacent to the London Borough of Tower Hamlets and the London Borough of Greenwich; it is clear that the Site has substantial capacity to accommodate taller buildings than those indicative heights provided.
10.23 As set out previously, the Tall Buildings document guides the formation of the tall buildings policy for the London Borough of Newham.

**Review of Tall Buildings**

10.24 We note that the Tall Buildings document recognises the “importance of a plan-led approach to tall buildings, with more site specific detail on larger sites regarding appropriate and sensitive locations and scale, including integration considerations - this needs to include considerations of cross boundary spatial integration”.

10.25 We agree with this approach, and in particular with the need to include considerations of cross boundary spatial integration. This should be reflected in the wording of the revised Local Plan and Thames Wharf and Silvertown Landing Site Allocations.

10.26 The Tall Buildings Local Plan Evidence Base document also makes clear that the permissible buildings heights are indicative rather than obligatory, the clarity of which should also be reflected in the wording of the policy.

10.27 Also set out previously, the Tall Buildings Study 2017 forms part of the evidence base and focuses on providing indicative heights for tall buildings at strategic sites across the borough.

**Review of Tall Buildings Study**

10.28 While the study recognises the influence of a number of tall buildings both within the Royal Docks area, and its surroundings, there is much emphasis on ensuring that future schemes in the area should relate to the as yet unbuilt Marco Polo building.

10.29 A weak justification for building heights within the Site is provided under the guise of reflecting current trends at riverside sites, and the need to create a unified approach to facilitate the Marco Polo building as being the dominant building for the area.

10.30 With respect to the former, while other riverside sites may appropriately accommodate predominantly 6 to 8 storey buildings with occasional 15 storey buildings, this fails to acknowledge the unique location of the Thames Wharf and Silvertown Landing area. The Site lies at the confluence of the River Lea and River Thames; forms the gateway to the London Borough of Newham; and lies in the setting of high-rise development within the adjoining boroughs.

10.31 Concerning the Marco Polo building, this
building will be located too far away to be recognisable within the Site and along this stretch of the Thames, particularly as there are existing buildings in the foreground that already obscure views.

10.32 Protecting views of this building is therefore the wrong approach and will only serve to stifle the full potential of the development on the Site. This approach also fails to take into account that height is only one factor in the distinction of a built form within the townscape.

10.33 The location of the Marco Polo building, on the apex of the bend in the River Thames on Bugsbys Reach, ensures that the built form at this particular location will always likely be a dominant feature in the townscape.

10.34 In this regard, and given the substantial separation between the Site and the as yet unbuilt Marco Polo building, there is no justifiable reason to limit building heights within the Site - which has a very different feel and townscape context to the other riverside sites in the Royal Docks area, which also offers very different opportunities and therefore cannot be considered on a like-for-like basis with other riverside sites.

10.35 As demonstrated in the townscape and visual mitigation-by-design rationale, and through a design-led process, the regeneration of the area would be cohesive with other riverside sites within the Arc of Opportunity, while also capitalising on its own strengths.
11. LOCAL PLAN REVIEW

PROPOSED SUBMISSION DRAFT LOCAL PLAN

11.1 The Newham Local Plan is currently the subject of a Regulation 19 Consultation, which specifically seeks to ascertain views on whether the proposed plan is ‘sound’ as per the tests set out in Paragraph 182 of the NPPF, insofar that it is:

- “Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

11.2 Accordingly, we have undertaken a review of the Proposed Submission Draft Local Plan, with respect to townscape and visual matters, to ascertain whether the proposed plan would be considered ‘sound’. Consideration of how development within the Site could come forward, based on appropriate evidence, has informed this review.

Revised Policy S1

11.3 Revised Policy S1 ‘Spatial Strategy and Strategic Framework’ sets out a series of strategic principles and a vision-based strategy for the borough. Specifically within the strategic principles section is noted that:

“...higher density, genuinely mixed use, context sensitive development will achieve good growth, creating and sustaining new and rejuvenated inclusive, stable, healthy, mixed and balanced communities...”

11.4 Within the vision-based spatial strategy it is noted that:

“...The greatest opportunities for change will come forward within the Arc of Opportunity which will be the primary focus for new job creation, infrastructure development, new town and local centres, carefully located tall buildings at public transport nodes, and the vast majority of new housing on large sites in Beckton, the Royal Docks, Canning Town and Custom House, West Ham and Stratford, reconnecting residents with the rivers and docks..

...New and enhanced open spaces and walking and cycling routes will be created throughout the borough, making best use of the borough’s waterways and green spaces, securing the delivery of optimal routes and nodal frequency, missing links and view corridors, to support the realisation of a connected, continuous permeable and legible movement and green space network...
...All new development will be well integrated with its surroundings to create successful high quality and well connected areas, including the limitation of tall buildings to identified suitable locations..."

11.5 Under the heading of ‘Design and technical criteria’ it is noted that “Sites should be designed and developed comprehensively” and furthermore that:

“The expectation that sites should be masterplanned, particularly Strategic Sites that should contribute to the delivery of key strategic links and connections set out in Policy S2-6 and INF2 of new local/town centres, or to accommodate tall buildings as per Policy SP4.”

Review of Revised Policy S1

11.6 We consider that the vision-based strategy for the London Borough of Newham is well prepared and on the whole is informed by appropriate documentation in relation to townscape and visual matters.

11.7 Furthermore, we welcome the recognition that the greatest opportunities for change are within the Arc of Opportunity. On the whole we agree with the vision-based spatial strategy, particularly in relation to the focus on providing tall buildings at public transport nodes.

11.8 Nonetheless, the wording of the vision-based strategy in relation to tall buildings should ensure that it is not overly prescriptive and that is allows for a degree of flexibility to allow the height of development proposals to be design-led in the context of each sites’ surroundings and assessed on a case-by-case basis, as opposed to setting an arbitrary limit on building heights.

11.9 Moreover, placing limitations on building heights could unintentionally restrict the development potential of a given site, rather than optimising its’ potential in accordance with the NPPF.

11.10 As demonstrated in the Design Rationale section, there is substantial scope to accommodate tall buildings within the Site as part of a comprehensive masterplan that delivers the vision-based spatial strategy for the area.

11.11 In light of the above, to ensure that the Local Plan is consistent with national policy, the wording of Revised Policy S1 should not prevent or discourage appropriate innovation nor impose or set out unnecessary prescriptive criteria concerning building heights, so as to align with Section 7 of the NPPF, and specifically the third bullet of Paragraph 58 of the NPPF which states that planning policies should "optimise the potential of the site to accommodate development”. Furthermore, one of the core planning principles of the NPPF is that planning should “always seek to secure high quality design".
Revised Policy S3

11.12 Revised Policy S3 ‘Royal Docks’ sets out strategic principles and a spatial strategy for the Royal Docks area. Noting within the Strategic Principles section that:

“...The Royal Docks will become a unique and high quality waterfront mixed use urban quarter realising the value of its many locational advantages and limited, plan-led, carefully Managed Release of employment land combined with co-location, intensification and sensitive infill, and innovative responses to flood risk...”

11.13 Under the heading of ‘Spatial Strategy’ it goes on to state:

“...Today’s fragmented residential development will become consolidated into distinct but interconnected neighbourhoods, benefiting from waterfront access and good access to stations, buses (including riverbuses) and an enhanced walking and cycling network...

...New street-based local centres will be developed at Thames Wharf and West Silvertown focused around North Woolwich Road and the DLR stations...

...The area’s key character assets, namely the open water and remaining historic buildings and structures of the docks, river/dockside views and views...will be re-valued and enhanced... ensuring that they form an integral part of the area’s future...”

11.14 A new Local Centre, coinciding with the location of a new DLR Station, is shown within the western part of the Site within the Policies Map.

Review of Revised Policy S3

11.15 We consider that the Strategic Principles of Revised Policy S3 ‘Royal Docks’ is suitably ambitious and offers the flexibility to bring forward substantial change within this part of the Arc of Opportunity.

11.16 As demonstrated in the Design Rationale there is the potential for development within the Site to enhance access to the waterfront, including through the provision of an enhanced walking and cycling network, while also tying in with the surrounding existing and emerging development, which would reduce any perceived sense of fragmentation in the townscape.

11.17 We welcome the fact that the Thames Wharf is identified as a new Local Centre, and accordingly the policy framework should provide a degree of flexibility to encourage an appropriate design-led response to realise this.

11.18 We note that reference to the Character Study provides a good starting point to guide development in the area, as set out in Paragraph 5.44. However, the design cues and principles should not justify limiting the development potential of a given site. Any development proposal should be considered on its individual merits, particularly where it seeks to create a new sense of place.
Revised Policy S4

11.19 Revised Policy S4 ‘Canning Town and Custom House’ sets out strategic principles and a spatial strategy for a wide area, encompassing Canning Town and Custom House, with the Site also identified within the southern part of this area.

11.20 Within the Strategic Principles section and specifically relating to the Site it notes that:

“...New local centres and community uses focused around West Hame and Thames Wharf stations will become resource hubs for new neighbourhoods and surrounding areas, marked by new tall buildings and well-used by new and existing residents, local workers and others passing through the area, with visitors drawn into the sites towards the rivers by attractive parkland routes and onward connections...”

Review of Revised Policy S4

11.21 We consider that the Strategic Principles of Revised Policy S4 ‘Canning Town and Custom House’ is suitably ambitious and offers the flexibility to bring forward substantial change within this part of the Arc of Opportunity.

11.22 The principles set out in relation to the creation of a new local centre at Thames Wharf are welcomed, particularly in relation to providing new tall buildings to help define the local centre.

11.23 The Design Rationale outlines how this could be achieved as part of a comprehensive masterplan, with additional areas of publicly accessible open space also incorporated within the layout of the development proposals to help draw people to the area and further establish a strong sense of place. Moreover, there is clearly scope to introduce tall buildings and we welcome that the policy is not overtly prescriptive in terms of overall height.

11.24 This more flexible approach allows for a more appropriate design-led response that also allows for consideration of cross boundary spatial integration as advocated in the Tall Buildings document that forms part of the Local Plan Evidence Base.

11.25 We further note that the Thames Wharf area is identified as a gateway to both the Royal Docks and the River Lea, and accordingly the scale, form and design quality of any development proposal brought forward should respond to this gateway function and not be stifled by overly restrictive or prescriptive planning policy.
Revised Policy SP1

11.26 Revised Policy SP1 ‘Borough-wide Place-making’ sets out specific criteria that development proposals should address, stating:

“...The following spatial features should elicit a design response in the creation of mixed use places:

• Topography, landforms, river corridors, green networks, important habitats, waterways, woodlands, other natural features and open spaces;
• Views and vistas to landmarks and skylines both within and outside the borough and including the River Thames and from and to new buildings and places;
• Heritage, cultural and infrastructural assets in line with Policy SP5;
• ‘Edges’ and severance between different parts of the borough and neighbouring areas; and
• Other local features that can contribute to the creation of successful distinctive places, or the absence of them and the need to create them.”

Review of Revised Policy SP1

11.27 We consider that the wording of Revised Policy SP1 ‘Borough-wide Place-making’ is suitably broad to allow for a degree of flexibility to ensure that development proposals are design-led. In particular we welcome that creating local distinctiveness is specifically outlined within policy, which is relevant to large scale strategic sites such as Thames Wharf / Silvertown Landing.

11.28 As demonstrated in the Design Rationale, those spatial features highlighted within the Spatial Strategy can elicit a positive design response to help create a distinctive place that transforms the borough and its attractiveness as somewhere to live, work and stay.

11.29 As stated previously, reference to the Character Study provides a good starting point to guide development in the area. However, the design cues and principles should not justify limiting the development potential of a given site. Any development proposal should be considered on its individual merits, particularly where it seeks to create a new sense of place.

11.30 Accordingly, where reference is made to Policy SP2-10, it is essential that these policies are appropriately worded to provide flexibility so as to not prevent or discourage appropriate innovation as per Section 7 of the NPPF.

11.31 We further note that the planning policy framework should allow for a given site to maximise the opportunities available to it for improving the character and quality of an area and the way it functions, in the spirit of Paragraph 64 of the NPPF and the overarching presumption in favour of sustainable development as per Paragraph 14 of the NPPF.
Revised Policy SP3

11.32 Revised Policy SP3 ‘Quality Urban Design within Places’ sets out specific criteria, which if addressed by development proposals, will be supported, stating:

“...The importance of an analysis of local character and the specific attributes of the site, seeking to reinforce or create positive local distinctiveness, whilst securing integration and coherence with the local context...

...The importance of providing legible, connected networks of streets, spaces and parks conducive to travel on foot or by bike...”

Review of Revised Policy SP3

11.33 We welcome that Revised Policy SP3 ‘Quality Urban Design’ advocates that a design-led site specific response is adhered to, which would allow for the level of flexibility required to not stifle appropriate innovation and maximise the development potential and opportunity of a given site or area.

11.34 We further welcome and acknowledge that Revised Policy SP3 recognises the importance of an analysis of local character to help create positive local distinctiveness, whilst securing integration and coherence with the local context.

11.35 In addition, we note that under the heading of Implementation in Paragraph 6.31, that the “Newham Character Study should be

a starting point in identifying aspects to address in scheme design. However, more detailed site based analysis will also be required”. We wholeheartedly agree with this approach, albeit contend that this should be explicitly stated within the wording of the policy framework.

11.36 A comprehensive and robust Preliminary Townscape and Visual Appraisal has informed the Design Rationale by carrying out an analysis of the local context to provide a design-led response to the positives and negatives of the local character while addressing the specific constraints and opportunities of the context.

11.37 From our site specific analysis it is clear that there is substantial scope to accommodate new development, including tall buildings, to help create a new sense of place while securing integration and coherence across the immediate and wider context, including consideration of cross boundary spatial integration.
Revised Policy SP4

11.38 Revised Policy SP4 ‘Tall Buildings’ sets out specific criteria, which if addressed by development proposals, will be supported. Under the heading of ‘Strategic Principles’ the following is provided:

“Tall buildings will, through their controlled location, height, design, form and impact contribute to best effect in promoting regeneration and creating successful places. Increased densities in the right locations will generally be encouraged, however, the appropriateness, added value and positive contribution of tall elements, particularly standalone tall towers will require robust justification and demonstration in relation to successful place-making and sustainable, mixed and balanced communities principles.”

11.39 The ‘Spatial Strategy’ notes which areas are most appropriate for tall buildings, stating that:

“...Other locations on Strategic Sites within both the Arc of Opportunity and Urban Newham are regarded as suitable locations in principle for tall buildings with scale reflecting place hierarchy and, ensuring sufficient space between clusters, as indicated in site allocations...”

11.40 Under the heading of ‘Design, Management and Technical Criteria’ the following is stated:

“Notwithstanding the above, in all cases the need for additional works, including the use of wire frames and 3D modelling to refine suitable locations and formations within this spatial framework with particular regard to the degree of public transport accessibility, local height context, heritage and other character assets and their settings and other sensitivities including cumulative impacts, in line with Policies SP1, SP3, SP5 and SP9, drawing on the Newham Character Study; and

In all cases the expectation that all tall buildings schemes will through masterplanning, detailed designs, modelling and expert and independent design scrutiny demonstrate appropriateness, added value and positive contributions relative to lower-rise alternatives, and exemplary design, execution and management standards (as per Policy SP3, SP5, and SP8) having regard to the initial screening and scoping reflected in Strategic Site allocation indicative height specifications and Indicative Height Matrix elsewhere, in respect of the following:

• Scale;
• Form and massing, including cluster formation/extension and spacing;
• Proportion and silhouette;
• Facing materials and detailed surface design;
• Integration with local and historic context;
• Impact on streetscape including surrounding public realm and near views and Key
Corridor objectives as per INF7:

- Impact on cityscape, distant views and skyline;
- Microclimate including daylight/sunlight, and pollution dispersal impacts;
- Contribution to legibility, successful place-making and sustainable, mixed and balanced communities principles;
- Management of communal spaces, inside and outside the building;
- Credibility of design from a technical and financial perspective including continuity of the project architect; and
- Safety, including fire prevention and safe evacuation.”

Review of Revised Policy SP4

11.41 We agree that Strategic Sites within the Arc of Opportunity are likely to be suitable locations for tall buildings, and furthermore that tall buildings can contribute to the promotion of regeneration and creating successful places.

11.42 We further agree that it is appropriate to require development proposals to demonstrate that their form, proportion and scale suitably integrates with the area. However, we contend that the wording and reliance on the indicative height specifications is not appropriate given that it is imperative a design-led approach is adopted to derive the best response, rather than an arbitrary height limit placed that may stifle innovation and the ability to release the development potential of a site and the opportunities that it may present.

11.43 The Tall Buildings Local Plan Evidence Base document makes clear that the permissible buildings heights are indicative rather than obligatory, the clarity of which should also be reflected in the wording of the policy.

11.44 A reliance and stipulation on permissible heights, while indicative, is at odds with the design-led approach advocated in Revised Policy SP3. Furthermore, this strategy on heights may result in the north bank of the River Thames appearing to lack any meaningful articulation, particularly when considering the wider cityscape and cross boundary integration needs of the area.

11.45 Accordingly, the Local Plan is at risk of not being considered ‘sound’ as its wording is restrictive and contrary to the golden thread of sustainable development. Paragraph 56 of the NPPF notes that “good design is a key aspect of sustainable development”. The Design Rationale clearly illustrates that there is substantial capacity to accommodate taller buildings, over and above the indicative heights, which would be a more appropriate strategy.

11.46 In this regard, Revised Policy SP4 is not considered to be positively prepared, consistent with national policy, or justified, due to its restrictive nature whereby a more flexible approach represents a reasonable alternative.
Revised Policy SP5

11.47 Revised Policy SP5 ‘Heritage and other Successful Place-making Assets’ sets out specific criteria, which if addressed by development proposals, will be supported.

11.48 Under the heading of ‘Strategic principles and spatial strategy’ it states:

“The value of heritage and other assets...which contribute to local character and successful places will be recognised by protection, conservation, and enhancements of the assets and their settings, and where appropriate, cultivation of new ones.

Urban design should recognise the strengths and weaknesses of local character and seek to contribute positively to the composition of the townscape, achieving better integration and enhancement of new and old, natural and built environments, infrastructure and living environments...”

11.49 Under the heading of ‘Design and technical criteria’ it is noted that:

“Proposals should refer to and draw on the borough’s Character Study which includes Areas of Townscape Value, and where relevant, Conservation Area Appraisals and Archaeological Priority Areas to help identify heritage and other assets relevant to their scheme, and strengths and weaknesses of local character...”

Review of Revised Policy SP5

11.50 We agree that the value of heritage and other character assets should be considered as part of any development proposal and welcome the policy wording in relation to recognising the strengths and weaknesses of local character.

11.51 However, the wording of the policy should make clear that reference to the Character Study should be the initial starting point, with further analysis required at a site specific level to deliver the appropriate design response, as per Revised Policy SP3.
APPENDIX 1: SITES SCHEDULE

Thames Wharf (S08)

11.52 The allocation for Thames Wharf (S08) states the following:

“There is scope to consolidate the safeguarded wharf at Central Thameside West (Royal Primrose Wharf) and subsequently to remove the wharf safeguarding at Thames Wharf subject to there being no net loss of functionality or wharf capacity. This and Managed Release from SIL (see Policy J2) could provide the opportunity to develop a new neighbourhood, comprising new residential and community uses including a school, and employment, leisure/tourism grouped around a new DLR station and Local Centre, well connected by pedestrian and cycle links.

Continuous riverside access; links to the Lea River Park and across to Trinity Buoy Wharf, to Royal Victoria and West Silvertown DLR stations and Canning Town town centre; North Woolwich Road active street improvements; and appropriate connectivity and integration with adjacent Silvertown Landing strategic site will be secured. Indicative building heights of 6 to 8 storeys with buildings of up to 15 storeys at key locations.”

Review of Thames Wharf (S08)

11.53 We consider that the indicative building heights set out, while not obligatory, are restrictive in their nature and conflict with the overarching principle of sustainable development.

11.54 Undoubtedly the Urban Character Study has been given substantial weight in the formation of the wording of this allocation. However, such an approach fails to take into account the site-specific considerations that are necessary to maximise the development potential of the area to suitably realise the many opportunities that the Site offers.

11.55 This presents three glaring issues, namely:

• Conflict with Policy SP3, which advocates site-specific responses;

• The stifling of good design and place-making, therefore in conflict with Section 7 of the NPPF (Paragraph 56 and 58) and Chapter 7 of the London Plan (Policies 7.2, 7.4, 7.5, 7.6, and 7.7); and

• Conflict with Policy SP4, insofar that limiting building heights may limit the potential for a development proposal to assist in legibility.

11.56 We note from the Tall Buildings Study 2017 Local Plan Evidence Base that “despite precedents for taller buildings in the area, new development on Newham’s riverside is laid out in a cohesive and well-planned way with a co-ordinated range of heights across all the riverside sites within the Arc of Opportunity”.

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11.57 There is no evidence that taller built form would not result in a cohesive and well-planned scheme that complements the existing and emerging urban fabric amongst the riverside sites in the Arc of Opportunity.

11.58 Contrastingly, the Design Rationale (which has been informed by a site specific analysis of townscape and visual matters) demonstrates that taller built form within the Site, than that set out in the Site Schedule, could:

• Positively promote the regeneration and creation of a successful place;
• Result in an appropriate response to the cross-boundary spatial integration required in this ever-changing dynamic context;
• Contribute positively to the townscape, creating a modulated decrescendo in building scale and height as the Thames extends east from the City of London;
• Improve the legibility of the townscape by assisting in wayfinding and acting as a gateway to the Royal Docks and the River Lea;
• Provide a sense of balance and integration with the surrounding area, while enhancing the streetscape and public realm; and
• Incorporate and create new vistas across the blue infrastructure network to enhance the visual amenity experience.

11.59 The Site Schedule should not prejudice the development potential of the Site to secure the best design-led response.

11.60 The most appropriate and reasonable alternative strategy therefore is to not place an arbitrary limit on building heights within Thames Wharf - S08.

Silvertown Landing (S09)

11.61 The allocation for Silvertown Landing states: “Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL, and consolidation and strengthening of the SIL on the eastern side of the site and beyond through continued SIL protection, together with strategic infrastructure. Employment uses on the SIL should include modern industrial and warehousing, but may also link to the adjacent LMUA, with the scope to secure Managed Intensification (as per J2) and further release if new formats are realised, reducing the spatial footprint whilst achieving the same capacity, functionality and ability to respond to industrial and warehousing demand.

The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL and include residential uses, green and community infrastructure meeting local need, and employment generating uses. Convenient and comfortable connections to the DLR stations at West Silvertown, Thames Wharf and Royal Victoria, and along and across
North Woolwich Road will be improved as will pedestrian and cycle links through to and along the river (where public space will open out) and docks and to nearby local centres and Canning Town town centre. Indicative building heights 6 to 8 storeys buildings of up to 15 storeys being acceptable at key locations ensuring that views of and the preeminence of the distinctive Marco Polo building at Royal Wharf are protected.

Review of Silvertown Landing (S09)

11.62 As with Thames Wharf (S08), we consider that the indicative building heights set out, while not obligatory, are restrictive in their nature and conflict with the overarching principle of sustainable development.

11.63 Accordingly the response to Thames Wharf (S08) applies equally to the Site Schedule for Silvertown Landing (S09).

11.64 In addition, Silvertown Landing (S09) makes reference to the protection of the preeminence of the as yet unbuilt Marco Polo building.

11.65 This approach is unique for a number of factors, not least in that it effectively stifles innovation in a setting of a building that does not exist. While the Marco Polo building has planning permission, there is no guarantee that this development will be built.

11.66 Furthermore, the restriction on building height is taken as a means to protect the preeminence of a building. However, this fails to take into account that height is only one factor in the distinction of a built form within the townscape.

11.67 The location of the Marco Polo building, on the apex of the bend in the River Thames on Bugsbys Reach, ensures that the built form at this particular location will always be prominent, while its distinctive vertically stacked and twisted built form will ensure that its silhouette will continue to draw the eye.

11.68 Indeed, through a design-led response at Silvertown Landing, as demonstrated in the Design Rationale, there is the potential to further amplify the preeminence of such a building. Through careful consideration of the wider cityscape, views could be directed towards this building to increase its significance in the skyline.

11.69 However, this cannot be achieved if the Site Schedule prejudices the ability of the Site to establish the best and most appropriate response to successfully integrate with, and enhance, its surroundings.

11.70 In addition, there are very few locations where there will be intervisibility of and between the Site and the as yet unbuilt Marco Polo building.

11.71 The most appropriate and reasonable alternative strategy therefore is to not place an arbitrary limit on building heights within Silvertown Landing (S09), particularly in relation to the as yet unbuilt Marco Polo building.
CONCLUSION
CONCLUSION

12. SUMMARY

12.1 Barton Willmore Landscape Planning and Design has been instructed by Silvertown Homes Ltd to provide townscape and visual advice in respect of the proposed redevelopment of that land at Thames Wharf and the Silvertown Landing Area (the ‘Site’).

12.2 The Site is identified as an area suitable for regeneration as it is located within both the ‘Royal Docks and Beckton Riverside Opportunity Area’, and the London Borough of Newham ‘Arc of Opportunity’, meaning that there is a greater capacity to absorb the type of development proposed.

12.3 Notably, the Site is not covered by any national regional or local landscape/townscape designations, nor does it lie within any of the protected viewing corridors as identified in the LVMF.

12.4 The Site is positioned at a unique location in the townscape, lying at the confluence of the River Lea and River Thames; in the setting of Canary Wharf and the Greenwich Peninsula; and corresponding with the location of a proposed new DLR station and the proposed Silvertown Tunnel. The Emirates Airline also passes over and through the Site.

12.5 With respect to published characterisations, at a national level the Site is identified within NCA Profile B1: Greater Thames Estuary, while at a regional level it is identified within Natural Landscape Area 14: Lower Thames Floodplain.

12.6 At a local level, within the Newham townscape character assessment, the Site is identified within the Industrial land (older concentrations of industry) typology, which forms part of the wider Royal Docks character area. However, to provide a finer grain of detail we have undertaken a townscape assessment and identified a series of more localised townscape character areas to facilitate a better understanding of the context within which the Site lies (with the Site identified in the Leamouth and Thames Estuary area).

12.7 The surrounding area is characterised by a diverse range of land uses of varying scale and built form. Low-rise industrial and commercial units occupy Trinity Buoy Wharf (which benefits from planning permission for 30 storey high built form), which lies to the west of the Site across the River Lea, while to the north of this Wharf is the Leamouth Peninsula, which features high-rise residential built form.

12.8 Further to the west, beyond Trinity Buoy Wharf, large scale residential and office blocks predominate, gradually stepping up in height towards the iconic Canary Wharf that stands at over 50 storeys at its peak. Across the Thames to the south lies the O2 Arena (with planning permission for built form up to 40 storeys high), while to the north-east lies Royal Victoria Dock, which is framed by high-rise built form of varying use (including the Hoola towers which are 23 and 24 storeys high).

12.9 The preliminary visual appraisal demonstrates both the visual character of the Site and its surroundings, as well as the existing visual envelope of the exiting built form. A common
element of the views towards the Site is the presence and influence of open expanses of water, which in turn allows for generally uninterrupted views of the Site. Inevitably, the regeneration of the Site is therefore likely to be clearly visible and will therefore need to take design cues from the surrounding area to integrate with its context.

12.10 Nonetheless, due to the built-up nature north of the River Thames, there are many locations where the Site is not visible, and any development proposal is similarly likely to not be perceived, due to the screening afforded by the intervening built forms.

12.11 The preliminary analysis of the existing and future baseline townscape and visual characteristics of the Site and its surroundings has identified that there are a number of opportunities for the redevelopment of the Site, and accordingly a mitigation-by-design rationale has been developed to help inform the iterative design process.

12.12 Key design considerations include:

- Positively promoting regeneration and creation of a successful place;
- Contributing positively to the cityscape, creating a modulated decrescendo in building scale and height as the Thames extends east from the City of London;
- Improving the legibility of the townscape, assisting in wayfinding and acting as a gateway to the Royal Docks and the River Lea;
- Providing a sense of balance and integration with the surrounding area, while enhancing the streetscape and public realm; and
- Incorporating and creating new vistas across the blue infrastructure network to enhance the visual amenity experience.

12.13 Specifically concerning the Regulation 19 Consultation on the Proposed Submission Draft Local Plan, we welcome the opportunity to provide feedback on whether the proposed plan would be considered ‘sound’, with respect to townscape and visual matters.

12.14 For the most part the Proposed Submission Draft Local Plan appears to be positively prepared and justified with respect to townscape and visual matters, and generally allows for the level of flexibility required to not stifle appropriate innovation and maximise the development potential and opportunity of a given site or area.

12.15 However, in reviewing the evidence base it is clear that there is no evidence set out within the Newham Character Study to justify limiting buildings height in the locality of the Site, and furthermore there are serious flaws with respect to the consideration of cross boundary spatial integration.

12.16 Moreover, there is no justifiable reason within the Tall Buildings Study to limit building heights within the Site. The Site has a very different feel and townscape context to the other riverside sites in the Royal Docks area, which also offers very different opportunities
and therefore cannot be considered on a like-for-like basis with other riverside sites. In light of the above, the emphasis given on these documents in the formation of the Draft Local Plan is misplaced, and highlights that the plan is not based on the most appropriate strategy as its evidence base is lacking with respect to townscape and visual matters.

12.17 Regrettably Revised Policy SP4 is restrictive in its nature and its reliance and stipulation on permissible heights, while indicative, is at odds with the design-led approach advocated in Revised Policy SP3. It is right, and proper, to guide where tall buildings may be appropriate through a spatial strategy as part of a plan-led solution. However, it is imperative that a design-led approach is adopted at a site specific level to derive the best response, rather than an arbitrary height limit placed that may stifle innovation.

12.18 Further to the above, the Local Plan Review Consultation Statement provides a summary of the responses received as part of the Regulation 18 Consultation. With respect to the topic of ‘Successful Places’ and the tall buildings matrix, it is noted that “2 Duty to Co-operate partners and a charity also responded and disagreed with limiting the heights of buildings via the matrix’. In this regard, it is unclear whether this policy, in its formation, has been based on effective joint working on cross-boundary strategic priorities.

12.19 As a consequence, this strategy on heights may result in the north bank of the River Thames appearing to lack any meaningful articulation or definition, particularly when considering the wider townscape and cross boundary integration of the area.

12.20 From our site specific analysis it is clear that there is substantial scope to accommodate new development, including buildings significantly taller than 15 storeys in height, to help create a new sense of place while securing integration and coherence across the immediate and wider context, including consideration of cross boundary spatial integration.

12.21 Tuning to the commentary provided within the Sites Schedule (Thames Wharf and Silvertown Landing), it is apparent that the limit on building heights presents three issues:

- Conflict with Policy SP3, which advocates site-specific responses;
- The stifling of good design and placemaking, therefore in conflict with Section 7 of the NPPF and Chapter 7 of the London Plan; and
- Conflict with Policy SP4, insofar that limiting building heights may limit the potential for a development proposal to assist in legibility.

12.22 This compounds the over-reliance on arbitrary limitations on building heights, which means that the Site Schedule may prejudice the development potential of the Site to secure the best design-led response.

12.23 Clearly, and as demonstrated within the preliminary mitigation-by-design rationale, the most appropriate and reasonable alternative strategy therefore is not to place an limit on building heights within the Site Schedules. The height and massing strategy should come through a site-specific response rather than an imposed constraint.
12.24 Further still, in light of the aspirations of the emerging London Plan to deliver an even greater number of residential units, it is crucial that brownfield sites such as Thames Wharf and Silvertown Landing truly maximise their development potential through a design-led approach.

12.25 The as yet unbuilt Marco Polo building is also referred to within the commentary for Silvertown Landing (S09), which limits building height on the basis of protecting the views of and the preeminence of this 18 storey building. Notably, while the Marco Polo building has planning permission, there is no guarantee that this development will be built.

12.26 Furthermore, the restriction on building height is taken as a means to protect the preeminence of this building. However, this building will be located too far away to be recognisable within the Site and along this stretch of the Thames, particularly as there are existing buildings in the foreground that already obscure views.

12.27 Protecting views of this building is therefore the wrong approach and will only serve to stifle the full potential of the development on the Site. This approach also fails to take into account that height is only one factor in the distinction of a built form within the townscape.

12.28 The location of the Marco Polo building, on the apex of the bend in the River Thames on Bugsbys Reach, ensures that the built form at this particular location will always be prominent, while its vertically stacked and twisted built form will ensure that its silhouette will continue to draw the eye.

12.29 Indeed, through a design-led response at Silvertown Landing, as demonstrated in the Design Rationale, there is the potential to further amplify the preeminence of such a building.

12.30 Turning to the London Plan, and in particular the considerations of Policy 7.7, it is apparent from the site specific analysis that the Site is suitable for the development of tall buildings (i.e. those “that are substantially taller than their surroundings”) as it is located within an Opportunity Area and the Arc of Intensification; it is in an area with good access to public transport in the future; introduced tall buildings as a group would improve the legibility of the area and enhance the skyline over neighbouring boundaries; it can contribute to improving the permeability of the townscape; and its redevelopment would make a significant contribution to local regeneration.

12.31 On the basis of the above considerations, and with reference to the preliminary townscape and visual appraisal and mitigation-by-design rationale, it is clear that reference to building height limits (while indicative) should be removed from Revised Policy SP4 and the Thames Wharf and Silvertown Landing Allocations for the Local Plan to be considered ‘sound’ from a townscape and visual perspective.
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