Matter 4 – Successful Places

Tall Buildings

Point 4.2 of the Note is concerned with Tall Buildings, and raises the following queries:

(i) Is the policy definition of tall buildings to be “of 6 or more storeys” appropriate for Newham? If not, what is an appropriate and justified definition for tall buildings in Newham?
(ii) Is the general focus of the Plan to enable the highest buildings in certain town centre locations, such as parts of Stratford Metropolitan Town Centre the Arc of Opportunity and Urban Newham, appropriate?
(iii) Should the policy be extended to other places with good public transport access?
(iv) Should the heights of tall buildings be subject to a more flexible/less prescriptive interpretation, such as a range of heights; for example, should each tall building proposal be determined through a set of parameters and/or a masterplan?
(v) How valid are the concerns that tall buildings cause alienation, or is this a matter that can be overcome by sensitive design?
(vi) Is the tall buildings matrix (Table SP.A) still required or is it superfluous?”

In response to (i) raised by the Inspector, the definition of tall buildings should match the London Plan definition of tall buildings, to ensure consistency.

The draft London Plan Policy D8 also provides guidance on tall buildings. The draft policy states that Borough’s should show identified areas for tall buildings on maps in development plans. This policy holds limited weight at present, however it does indicate the direction of travel and highlights that tall buildings should be part of a plan led approach. We support this approach and reiterate our previous representations in stating that areas allocated for tall buildings (including Gallions Reach Shopping Park as part of the future Major Town Centre), should be identified on a plan.

In terms of (ii) Policy 7.7 of the London Plan (Location and design of tall and large buildings) promotes appropriate guidance.

The first point is that tall or large buildings should not have an unacceptable harmful impact on their surroundings. This reflects that some locations are inherently more sensitive than others. Rather than set a prescriptive range of heights, we consider that a criteria-based policy would be more appropriate including:

- Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
- Relate well to the form, proportion, composition and scale and character of surrounding buildings, urban grain and public realm.
- Located in existing or emerging town centres.
- Individually or as a group improve the legibility of an area by emphasising a part of civic or visual significance (this is particularly important in areas which have the opportunity to create new residential communities such as Gallions Reach).

In summary, we consider that a more flexible approach to determining appropriate height would be correct, based upon defined criteria.

Our view is that not all sites require the preparation and approval of a masterplan covering multiple site ownerships. This should reflect that the delivery of and even potentially the future
use of some sites may not be known and/or capable of being brought forward at the same time as other sites.

However, on large sites under a single ownership, it would still be appropriate to prepare a masterplan which shows illustratively potential change beyond the application site boundary.

Our view is that it could also be appropriate to agree the overriding strategy towards streets and spaces within which future blocks will be accommodated.

If height parameters are tested, they can be set through a townscape and visual impact assessment prepared in support of an application.

**Town Centres**

Matter 4.3 of the Note is concerned with successful town centres, and has particular regard to policies INF5 and SP6. At paragraph 4.3 (ii) the note states that:

“(ii) Should the Plan provide more detail on the quantum and location(s) of comparative and convenience retail provision for the plan period, e.g. for the Gallions Reach Shopping Park (set out in policy INF5.2.i)? Should the Plan set any quantitative parameters for the growth/consolidation of Stratford town centre? What is the definition of a major town centre?” [note: we believe that this should refer to comparison rather than comparative retail provision].

Part (iv) goes on to state that:

“(iv) Should the Plan make provision for a specific quantum or range of retail floorspace in the town and local centres which would be deliverable within the plan period?”

As per our previous representations, the Plan needs to be sufficiently responsive and flexible in order to ensure that the development of the new town centre is not unduly delayed. It is likely that some phases of development may come forward against a backdrop of co-ordination between neighbouring landowners with the assistance of Newham, TfL and the GLA. Given the scale of the sites, and their different timescales for delivery, each landowner is likely to masterplan its land ownerships. Coordination is already taking place, not least in terms of the opportunities to improve public transport facilities. Therefore there is no need to prepare and finalise an overarching masterplan before applications can be brought forward because coordination is already taking place.

In response to point 4.3 (ii) raised by the Inspector, it is therefore not possible to provide an indication of the quantum of the different uses that should be provided in the town centre should be wide ranging. The important element is ensuring that the masterplan, as it evolves, provides development blocks that have the flexibility to provide the uses that will be required by a new community.

In order to enable Gallions Reach to evolve to become a major town centre it is important to ensure that the requirements are not too prescriptive in terms of when there will be an increase in floorspace or the exact mix of uses that will be proposed. This is further discussed in our previous representations, in **Appendix 1**.
Dear Sir / Madam


These representations are submitted on behalf of Aberdeen Standard Investments, owners of Gallions Reach Shopping Park.

Aberdeen Standard Investments bought Gallions Reach Shopping Park in 2006. Since purchase Aberdeen Standard Investments has, and continues to implement a number of asset management initiatives in order to improve the overall appearance of the park and also improve the tenant mix on offer. These asset management initiatives have been undertaken within the context of wider ambitions for the long term transformation of Gallions Reach into a major town centre to include a wider range of uses.

The submission of these representations on behalf of Aberdeen Standard Investments form part of the longer term management and development aspirations for Gallions Reach Shopping Park and the wider area.

In accordance with paragraph 182 of the NPPF these representations consider whether the plan as prepared is “sound”.

Paragraph 182 of the NPPF states that:

“A local planning authority should submit a plan for examination which it considers is “sound”- namely 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.”
**Policy INF5 – Town Centre Hierarchy and Network**

The need for Gallions Reach to become a major centre is recognised by Policy INF5 and shown on the plan at page 13. The identification of this is supported as forming an important part of the town centre hierarchy moving forwards.

If adopted as currently drafted part 2(j) of Policy INF5 will state:

“The need for Gallions Reach Shopping Park to become a Major Centre serving the eastern edge of Newham and wider growth area, through re-configuration of its floorspace as part of a wider masterplan for the area to incorporate a more rounded offer and vertical mixed use, with improved local connections and public transport links”

The Plan needs to be sufficiently responsive and flexible in order to ensure that the development of the new town centre is not unduly delayed. As part of the ongoing asset management of the Shopping Park it is likely that the development will be brought forward within the general context of the wider framework. It needs to be recognised that some preliminary phases of development may come forward prior to the finalisation of the wider masterplan. Development of this type should not be prejudiced by the lack of availability of the masterplan and therefore flexibility is sought in order to ensure that these asset management initiatives can be brought forward at the same time as work on the masterplan is progressing.

As set out above it is essential that these more short and medium term asset management initiatives are supported in order to maintain the centres function and retain the strong basis to build the future major town centre.

It is not possible to provide an indication of the quantum of the different uses that should be provided in the town centre should be wide ranging. The important element is ensuring that the masterplan as it evolves provides development blocks that have the flexibility to provide the uses that will be required by a new community.

In order to enable Gallions Reach to evolve to become a major town centre it is important to ensure that the requirements are not too prescriptive in terms of when there will be an increase in floorspace or the exact mix of uses that will be proposed. In addition to the preparation of the masterplan for the wider area the Aberdeen Standard Investments need to be able to respond to changes in tenant and market demand. Therefore there needs to be recognition within both Policy INF5 and the supporting text at paragraph 6.249 that there may be a need to increase the range of uses and amount of floorspace in advance of the masterplan and additional residential development taking place.

The following change is therefore suggested to the supporting text at paragraph 6.249 (additions underlined):

“Gallions Reach has always been regarded as an out of centre location in policy terms. However, the reality is that it accounts for a significant amount of spend and hence employment in the borough, is on the edge of an area of sub-regional population growth, and offers a relatively different offer to other nearby centres (Barking, East Ham and East Beckton). It is therefore proposed that it changes to become a Major town centre as part of the development of the Beckton Riverside site which will increase its local trading, recognising its current deficiencies in terms of its limited range and offer, the dominance of access by car despite some improvements to bus usage, and a layout and design that cuts it off from nearby residential areas. Allocation of Gallions Reach as part of the wider site allocation for a significant new piece of urban development would allow for the various constraints that impact on the site to be managed to best effect and for the retail provision to be better integrated into the town centre network. Importantly, the immediate focus therefore should be on qualitative change and re-configuration through the introduction of new additional uses. This may also lead to an increase in retail floorspace, which will be assessed against the relevant tests in the NPPF at the appropriate time, rather than a net increase in floorspace, which should be closely linked to an increased in residents in the immediate Beckton.
Moreover, any changes in floorspace should be undertaken in conjunction with a comprehensively master planned as part of wider changes to retail, residential and other employment, transport and utilities development in the area; it is recognised that development can come forward in advance of the master plan being prepared.”

Annex 1 of the Draft London Plan (December 2017) identifies future potential changes to the town centre network. Gallions Reach is identified in Figure A1.1 as having the potential to become a major town centre. This is further confirmed in Table A1.1 (Town Centre Network).

The identification of the need for Gallions Reach to become a major town centre is sound as it has been identified and supported by evidence at both the local and regional level. A number of minor modifications to the text are proposed as set out above in order to ensure consistency throughout the plan.

Policy SP6 – Successful Town and Local Centres

The overall strategic policy of ensuring that town and local centres are vibrant, vital and valued as components of neighbourhoods and the borough as a whole is supported. The proposed change to Gallions Reach Shopping Park as identified in Policies INF5 and S5 will enable Gallions Reach to become a community focus, employment hub and as a destination through its character, offer and connectivity to the hinterland. The spatial strategy at 2(c) states that:

“Diversifying uses, encouraging the location of services and flexible community spaces, ‘meanwhile’ uses, quality night-time economy, visitor and cultural attractions and facilities, and the creation of residential dwellings in such centres as appropriate to their size and function, to add to their activity levels.”

This is supported with regard to the proposed future changes to Gallions Reach Shopping Park. The recognition of the importance of maintaining a robust retail core whilst ensuring a variety of unit sizes is supported.

Part (f) of Policy SP6 recognises that the Council will manage the centres as part of a clearly defined network and hierarchy in line with Policy INF5. This is supported along with the encouragement of the consolidation of commercial uses within their boundaries and responding to the individual vision for Gallions Reach as set out in Policy S5.

Policy S5 – Beckton

Policy S5 (1b) outlines the strategic criteria for Beckton. Part 1b states that strategic criteria includes “major new housing (approximately 5,278 units)”. From undertaking its own capacity studies, Aberdeen Standard Investments understands that there is potential for new residential development, which significantly exceeds this figure across the Beckton Riverside site allocation alone (S01). We would therefore suggest that there is an opportunity for a major increase in residential development in this location, and we would seek to ensure that the capacity of the Beckton Riverside site allocation is not limited by this figure of 5,278 units. Masterplanning is now being undertaken and Aberdeen Standard Investments would seek to agree with Newham the additional capacity during the preparation of the plan.

Policy S5(g) identifies that links will be improved with surrounding areas, through the potential extension of the DLR. Aberdeen Standard Investments supports this initiative, and the inclusion of this initiative within policy is justified and consistent with the preparation of other policy documents, including the Draft Mayor’s Transport Strategy (2017). Particular attention will need to be given to the potential location of the DLR station to ensure both that the location maximises accessibility to new resident population as well as ensuring that disruption to existing facilities is minimised.
Policy S5(2a) states that:

“Gallions Reach Shopping Park will co-evolv and intensify to become a Major town centre for the area focused around a transport hub, in the mix of shops and wider offer provided, the variety of unit sizes, the connections with local residential areas – including new housing in vertical mixed use formats within it, and reduction in the dominance of car parking.”

The identification of Gallions Reach Shopping Park evolving to become a Major town centre is supported along with a wider mix of shops and the range of uses offered. It is important to recognise that some of these uses (including residential) will come forward in advance of the finalisation of the master plan for the wider area.

This policy is supported by a plan at page 65 which identifies the strategic site and a location for the new town centre. This map should refer to a “New Major Town Centre” in order to be consistent with Policy INF5 and Policy S5.

In addition to providing strategic criteria and objectives, the strategic Site allocation S01 is justified through Policy S5. Site allocation S01 is of high relevance to the Park and this allocation is discussed further below.

**Strategic Site S01 - Beckton Riverside Site Allocation**

In order to be in accordance with **Policy INF5** (Town Centre Hierarchy and Network) the Beckton Riverside Strategic Site Allocation should make reference to the creation of a major town centre focused on the current Gallions Reach Shopping Park as part of the allocation. The proposed change is set out below (underlined).

“Mixed use delivering new neighbourhoods centred on a major town centre and new station, new and expanded Strategic Infrastructure and other SIL uses. The new neighbourhoods and major town centre -comprising residential, pedestrian and cycle links through the site and to the river, proportionate open space and other green infrastructure that opens up riverside access including space that adds to MOL, retail, leisure, supporting community uses notably an all-through school, and other employment generating uses - will be delivered through partial Managed Release of SIL, appropriate buffering of remaining SIL, and re-formatting and diversification of the existing retail park around a new transport hub, preferably moving it south. New Strategic Infrastructure including an expanded DLR depot to meet growth needs, and river crossing(s), together with the existing CHP plant and legacy gas pressure infrastructure will be accommodated within the site, minimising its spatial impact, where possible allowing for Managed Intensification of associated SIL as per Policy J2. The quantum and functionality of other SIL in the southern part of the site will be protected, but could be re-located to better effect, securing improved land use transitions and integration given potential compatibility with the DLR depot, neighbouring SIL and bridge footprints. There is scope to incorporate the safeguarded waste development site within a comprehensive redevelopment, either through the inclusion of a waste facility, or where lack of need/ or availability of an alternative site can be demonstrated, as a further opportunity for residential-led mixed use. Indicative heights: 5 – 8 storeys or less, stepping up to 12 storeys at key locations and up to 19 storeys in a new major town centre and around a new DLR station.”

The removal of the waste management allocation from this site is recognised as an important part of ensuring that the aspirations of Policy INF5 can be delivered.

Aberdeen Standard Investments supports the allocation of the Beckton Riverside strategic site. This will enable the delivery of a major town centre as identified in Policy INF5. The policy text for allocation S01 further confirms that a new major centre is proposed. Aberdeen Standard Investments considers that the boundary of that new major centre should be defined more clearly. It should comprise the Gallions Reach Shopping Park and not the
entire site allocation. As such, we would seek to ensure that the boundary for the major centre (Gallions Reach Shopping Park) should be identified on a proposals map, as discussed in the following section.

The allocation identifies that residential led mixed use developments of up to 19 storeys are appropriate in new town centres and around a new DLR station. Aberdeen Standard Investments support the recognition of the Site’s capability to facilitate tall buildings and this initiative is consistent with national and regional policy, which seeks to optimise the delivery of housing.

The proposed tall buildings policy SP4 aligns with this allocation and provides further justification for tall buildings in this location. As such, the allocation is justified in accordance with paragraph 182 of the NPPF.

The draft London Plan Policy D8 also provides guidance on tall buildings. The draft policy states that Borough’s should show identified areas for tall buildings on maps in development plans. This policy holds limited weight at present, however it does indicate the direction of travel and highlights that tall buildings should be part of a plan led approach.

To ensure that the Local Plan is effective and positively prepared, and to avoid conflict with the emerging London Plan, we would suggest that the acceptability of tall buildings on this Site is further confirmed and identified on a map. At present, it is assumed that policy is referring to Gallions Reach Shopping Park as an appropriate location for 19 storeys, as it is a new major centre. This assumption is strongly supported by Aberdeen Standard Investments, however this assumption needs to be confirmed on a map to ensure that the Local Plan has been positively prepared. This is discussed further in the following section.

The Draft Royal Docks OAPF (which is being finalised) also recognises the area’s potential for high density residential led development. The Framework is being jointly prepared by the Mayor of London, Newham Council and Transport for London. As the Framework is also being prepared by Newham Council, we would anticipate and encourage that the Framework reflects the Proposed Local Plan by identifying that the Site is appropriate for tall buildings, to ensure that all Development Plan documents are consistent.

**Proposals Map Changes**

It is acknowledged and supported that the strategic site allocation S01 is identified as a strategic site through the proposal map changes. However, to ensure that the Plan has been positively prepared, there needs to be consistency between policy text and policy maps. At present, a number of initiatives which are supported in policy text, are not referred to on policy maps. This is in conflict with Paragraph 182 of the NPPF.

The proposal map relating to S01 identifies routes of ‘improved connectivity’. The policy text regarding S01 identifies that the allocation includes the delivery of new infrastructure, inducing a DLR extension. The aspirations for a DLR extension in this area are also reiterated within the Draft Mayor’s Transport Strategy (2017).

To ensure that the allocation and proposals map are sound and consistent, we would suggest that the potential DLR extension is identified on the map with a marker. The proposed location for the DLR extension is identified in **Appendix 1**.

Policy INF5 identifies that Gallions Reach Shopping Park, which is situated within allocation S01, has the ability to become a major centre. For the purposes of consistency, and ensuring that policy is effective and justified, we would suggest that Gallions Reach Shopping Park is identified as a future major centre on the proposals map as per the other major centres. We would suggest that a line is drawn around Gallions Reach Shopping Park, to identify where the future town centre boundary will be (**Appendix 2**). This will ensure that policy is positively prepared over the plan period as the Park develops into a major centre.

Site allocation S01 also identifies that areas around major centres and infrastructure are suitable locations for developments of up to 19 storeys. From reading policy, this would indicate that Gallions Reach Shopping Park and the immediate adjoining area would be the most appropriate location for taller buildings. This identification
is fully supported by Aberdeen Standard Investments however, we would seek to ensure that this allocation is further consolidated through a marker on a map. The draft London Plan states that all areas for tall buildings should be identified on a map to ensure that local plans are positively prepared.

The proposals map changes includes Tall Buildings Area maps, but does not include Gallions Reach. In view of the above, we would suggest that the site’s potential for tall buildings is identified through a ‘Gallions Tall Building Area map’, either through a marker or a boundary to be consistent with the other proposals maps.

Closing

If you require any further information please do not hesitate to contact me.

Montagu Evans LLP
Appendix 1

Proposed DLR Location
Appendix 2
Future Town Centre Boundary