STATEMENT OF CASE

Matter 6 – Homes

Prepared on behalf of Silvertown Homes Limited

(Participant Number: 25)

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<th>26299/A5/Reports</th>
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Barton Willmore LLP

Tel: 
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Our Ref: 26299/A5/Reports

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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 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 6.1 Overall housing need for Newham

2.2 Policy H1 provides for a net increase of at least 43,000 new homes in Newham over the period 2018 to 2033, i.e. 2,867 dpa. This figure accords with the adopted London Plan, which makes provision for a minimum of 19,945 new homes over the period 2015-2025 (i.e. 1,994 pa, which rolled over to 2030, produces a figure of 43,868 homes). The emerging Draft London Plan, however, proposes a higher housing target for Newham of 3,850 dpa, based on more recent assessments of housing need. Given the dramatic increase in housing need for Newham which is set out in the emerging Draft London Plan and with reference to section 6 of the Framework:

(i) Does the submitted Plan accord with the Government’s prioritisation of the delivery of new homes, as expressed in its recent White Paper, or is the Plan unnecessarily cautious in terms of housing delivery??

(ii) Should the overall housing need figure for Newham remain as set out in the submitted Plan, in accordance with the provision of the adopted London Plan; and/or

(iii) Should the housing provision in the Plan be subject to an early review as soon as the emerging London Plan is adopted?

SHL’s Response

2.3 SHL consider that the housing target set out in LBN’s draft Local Plan Review is too cautious and should adopt the increased housing target for LBN set out in the Draft New London Plan (December 2017) as this emerging strategic document:

- Demonstrates a clear trend for increasing housing need in London that is supported by a Strategic Housing Market Assessment (SHMA, 2017) and concludes that there is an identified need for 66,000 additional homes per year¹. 40,000 new homes will be delivered via large sites (0.25 hectares or more) and 24,500 will be delivered via small sites²;

² Paragraph 4.1.8 of the Draft New London Plan (Dec 2017)
Demonstrates, via a London-wide Strategic Housing Land Availability Study (SHLAA), that there is only enough estimated capacity in London for 64,935 homes per annum over a 10-year period (2019/2020 to 2028/2029);  

2.4 LBN’s policy H1 only provides for a net increase of at least 43,000 new homes in Newham over the period 2018 to 2033. The equates to 2,867 dpa.

2.5 SHL acknowledge that LBN’s proposed annual housing delivery target accords with the adopted London Plan (which makes provision for a minimum of 19,945 new homes over the period 2015-2025. i.e. 1,994 pa), which rolled over to 2030, produces a figure of 43,868 homes. However, when the emerging Draft London Plan is adopted in the Winter of 2019/20, LBN’s proposed housing figure target will be out-of-date and the adopted Local Plan will not have adequately “planned” for this higher annual target. LBN has an opportunity to adequately plan for the future housing need for the Borough, so why not take this opportunity now?

Matter 6.2 Overall provision of housing for Newham

2.6 Does the Plan provide sufficient evidence to demonstrate that the 43,000 homes total can be implemented over the plan period, i.e. that the Plan is realistic? If not, is there an argument for greater intensification, e.g. in areas of previously developed land (PDL) and other areas of opportunity?

SHL’s Response

2.7 There are large-scale PDL sites in LBN that can accommodate higher-density levels of housing to make up for LBN’s shortfall in housing delivery should the Inspector agree that the draft London Plan’s annual housing target should be adopted by LBN. These sites include the Site S08 (Thames Wharf) and S09 (Silvertown Landing), which are PDL sites located with LBN’s Arc of Opportunity and benefit from good levels of public transport accessibility. In particular, if the retained SIL allocation on the S09 site were to be removed in its entirety, this would help to deliver a significant number of homes above re-provided flexible industrial units via a “co-location” approach. This site would then act as a buffer to the retained SIL land on the adjacent Nuplex site. Further discussion on this matter is set out on SHL’s SOC in respect of Matter 12.

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3 Page 146, Table 4.1 of the Draft New London Plan (Dec 2017)  
4 [https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan](https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan)
Matter 6.3 Five year housing land supply

2.8 With reference to paragraph 47 of the Framework:

(i) Does the Plan provide sufficient evidence to demonstrate that the 43,000 homes total can be implemented over the plan period, i.e. that the Plan is realistic? If not, is there an argument for greater intensification, e.g. in areas of previously developed land (PDL) and other areas of opportunity?

(ii) Would the Plan at adoption be able to demonstrate that it has a five year supply of specific deliverable sites sufficient to provide five years’ worth of housing?

(iii) What are the key assumptions/parameters which the Plan has relied on to calculate its 5 years housing land supply (HLS), such as whether it assumes a 5% or 20% buffer and whether the buffer should be factored in for just the first 5 years or for the plan period as a whole?

(iv) What are the component sources of the Plan’s housing supply?

SHL’s Response

2.9 SHL does not wish to comment on this matter.

Matter 6.4 Affordable housing

2.10 With reference to paragraph 47 of the Framework:

(i) Is policy H2 justified and effective, for example in what it means by AH, as well as in relation to its overall AH percentage (50%) target and its proposed tenure mix and viability requirement? Should provision be made for a more flexible tenure split where schemes exceed 35% AH?

(ii) Should AH be calculated by habitable room?

SHL’s Response

2.11 SHL does not wish to comment on this matter.

Matter 6.5 Family housing

2.12 Is the 39% target for family housing on sites of 10+ dwellings justified and realistic? Should the target be more flexible, for example set out as a range, and should the definition of family housing include 2 bed properties?
SHL’s Response

2.13 As per previous representations, it is considered that 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 allow a case to be made on a site by site basis.

2.14 SHL also consider that 2-bed units should also be considered ‘family housing’ reflecting paragraph 4.12.3 in the draft new London Plan which confirms that families do live in two-bedroom units and this should be taken into account in assessing need.

Matter 6.6 Specialised housing

2.15 With reference to paragraph 47 of the Framework:

(i) Does policy H3 adequately cover the range of specialist accommodation needs to Newham, including student accommodation, housing for older people and other vulnerable groups and houses in multiple occupation?

(ii) What is meant by “cumulative impact hotspots” (policy H3.2.f, and is there a need for a policy to set out principles to safeguard residents’ living conditions, e.g. privacy, noise and disturbance, outlook and overshadowing?

SHL’s Response

2.16 SHL does not wish to comment on this matter.

Matter 6.7 Gypsies and Travellers

2.17 In the light of the Inspector’s Report into gypsy and traveller accommodation (June 2017), is there any further matter this Plan should address?

SHL’s Response

2.18 SHL does not wish to 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.

<table>
<thead>
<tr>
<th>POLICY</th>
<th>COMMENTS</th>
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<tr>
<td>S1 Spatial Strategy &amp; Strategic Framework</td>
<td>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.</td>
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<td>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). It is acknowledged that the draft London Plan target is ambitious and</td>
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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.

<table>
<thead>
<tr>
<th>S3 Royal Docks</th>
<th>The spatial strategy for the Royal Docks is supported in principle to provide a ‘high quality waterfront mixed use urban quarter’.</th>
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<td>- Part 1b:</td>
<td>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).</td>
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<td>- Part 2b:</td>
<td>A new local centre on Strategic Site S08 is welcomed.</td>
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<td>- Part 2c:</td>
<td>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.</td>
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<td>- Part 2f:</td>
<td>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).</td>
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<td>- Part 2k:</td>
<td>The inclusion of Silvertown Landing in the list of Strategic Sites in supported.</td>
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<td><strong>S4 Canning Town and Custom House</strong></td>
<td><strong>Part 1a:</strong> 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.</td>
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<td><strong>Part 1c:</strong> 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.</td>
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<td><strong>Part 2c:</strong> A new local centre is welcomed at Thames Wharf, marked by new tall buildings.</td>
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<td><strong>Part 2I:</strong> The inclusion of Thames Wharf (S08) in the list of Strategic Sites in supported.</td>
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<td><strong>Page 53 (Map):</strong> 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.</td>
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| **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. |

<p>| <strong>SP3 Quality Urban Design within Places</strong> | <strong>Please see page 83 of the Preliminary Townscape &amp; Visual Appraisal attached at Appendix 2, prepared by Barton Willmore’s Townscape Team and Fosters + Partners.</strong> |
|  | 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. |</p>
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<th>Policy</th>
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| **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 | o Part 1a: 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).

o Part 1c: 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 deliver 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.

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<td>H2 Affordable Housing</td>
<td>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.</td>
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<td>INF1 Strategic Transport</td>
<td>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.</td>
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<td>INF3 Waste and Recycling</td>
<td>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</td>
</tr>
</tbody>
</table>
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.

**IN5 Town Centre Hierarchy and Network**

Part 2n: SHL supports the creation of a new local centre on the Thames Wharf site (S08)

Page 272 (Map – Retail Hierarchy Map): SHL supports the creation of a new local centre on the Thames Wharf site (S08)

**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:

a. 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
b. 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
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 needs 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 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 to 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:

a. 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);

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

c. 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

d. 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**

- **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 grouped 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 IIAs**

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. Silvertown Homes Ltd
Appendix 2