Dear Ms Newmarch,

RE: EXAMINATION OF THE LONDON BOROUGH OF NEWHAM DETAILED SITES AND POLICIES DEVELOPMENT PLAN DOCUMENT

Thank you for informing us of the status of the Detailed Sites and Policies Development Plan Document (DPD) and giving us the opportunity to make further representations to the soundness of the Plan. We respond on behalf of our client, Crossrail Limited, whose interest relates to the future development of the sites identified as ‘S18 Limmo’ in the London Borough of Newham Core Strategy (adopted 2012) and a site located within the Standard Industrial Estate.

We support the principle of a Detailed Sites and Policies DPD that seeks to strengthen and complement the existing Local Plan by adding new and detailed policies to guide development in the Borough. We welcome a Development Plan Document that will provide clear guidance on the promotion of new homes, jobs and infrastructure. However, we are keen to ensure that the aspirations and objectives outlined in the plan align with the objectives of the National Planning Policy Framework (NPPF) and the National Planning Policy Guidance (NPPG) to proactively drive and support sustainable economic development to deliver new homes.

We would like to make the additional representations to support our previous consultation responses to the Detailed Sites and Policies DPD. We have responded to specific bullet points identified within the Matters and Questions section of the Inspectors Guidance Note;

Matter 2 - Other Housing Matters

- Representor Crossrail seeks a change to the DPD for Spatial Site 18 (Limmo) to bring forward high density development. Is this a matter which affects the soundness of the DPD, and if so, how?

The Mayor’s introduction to the Detailed Sites and Policies Development Plan Document confirms that the DPD has been prepared to focus on parts of the Local Plan where we think further work is needed to strengthen existing policies, in particular looking at the provision of jobs, homes and the infrastructure needed to support them. It states that the DPD document will allocate non-strategic sites to help boost the delivery of homes and jobs.

The NPPF states that Local Plans should be positively prepared, seeking opportunities to meet development needs in their area. There is currently a clear growth agenda at national and regional level seeking to optimise housing and economic development. The NPPF sets an overarching emphasis on encouraging new development, ensuring that it is not overburdened by the planning process, with the presumption in favour of sustainable development at its heart.
The Further Alterations to the London Plan adopted on 10th March 2015, states that over the next 10 years the London Borough (LB) Newham should provide a minimum of 19,945 residential units (1,994 units annually). The Borough has set an even higher target within its adopted Core Strategy (2012) to achieve the provision of 37,500 new homes (2,500 units annually) by 2027. We firmly support LB Newham’s ambition to deliver housing in excess of the London Plan Targets.

More recently the GLA has just commenced consultations on the Royal Docks & Beckton Opportunity Area Planning Framework document which identifies both Crossrail sites within the Opportunity Area boundary. The document indicates how the area can be regenerated to realise its potential and provide 25,500 new homes and 60,000 new jobs.

The spatial vision for the LB Newham is to create thousands of homes to meet and exceed the housing targets set by the GLA and themselves. Due to the size of the existing strategic site allocations, designating these sites for high density rather than medium density residential development where appropriate could provide a significant increase in the number of residential units that could be delivered. We do not consider that the DPD has not been positively prepared as it has been compiled without re-assessing the existing strategic site allocations, whilst allocate new housing sites.

The Limmo site is within 400m of the Canning Town District Centre and is located next to Canning Town station which is served by the Jubilee and DLR lines. The site is also adjacent to the high density Ballymore City Island development to the West, which is currently under construction. This is in addition to the other high density residential developments coming forward on strategic sites identified within Canning Town and Custom House. It is evident that the emerging local context is being transformed into a highly accessible, high density built environment which should be reflected within the Limmo site allocation. It is considered that the existing designation for medium density is not consistent with the emerging local context or national, regional or local policy which promotes high density residential accommodation in highly accessible locations.

Throughout our continued dialogue with officers at LB Newham, justification for not re-assessing the existing strategic sites has not been fully explained despite our continued representations.

It is therefore considered that the DPD has not been positively prepared and is a missed opportunity for the Limmo site to be fully optimised in accordance with national, regional and local policies, and contributing towards the GLA and LB Newham housing targets on accessible brownfield locations.

Matter 8 - Green Infrastructure

- What is the rationale for the designation of the linear open space, Ref GS330? Is this potential brownfield development land which should not be identified as Green Space? Does this affect the soundness of the plan?

The submitted Detailed Sites and Policies DPD Policies Map designates a linear parcel of open space on the Limmo site as GS319 rather than GS330.

The brownfield Limmo site was previously in industrial use, prior to its current use as a site to facilitate the construction of Crossrail. The site has not previously been in use as public open space.

The existing adopted LB Newham Local Plan Proposals Map does not identify part of the Limmo site as public open space or Site of Importance for Nature Conservation (SINC). The submitted DPD policies map appears to identify the same piece of the Limmo site as a SINC, in addition to an area of open space (GS319).

We understand and support the provision of connections through the site to ensure it is well integrated into its surroundings, maintaining a riverside walk along the River Lea. However, the submitted DPD has not justified the allocation of either the open space or SINC on the Limmo site. It is considered that this
allocation could restrict the number of residential units that could be delivered by predetermining the location of the open space on the site. When a residential-led scheme comes forward, a reasonable proportion of the site will be required to provide public open space under separate planning policy. Designating areas of public open space within strategic site allocations that are required to optimise the delivery of new homes is not justified and suggests that the DPD has not been positively prepared as required by paragraph 182 of the NPPF. Sufficient flexibility should be given to delivery of open space in the most appropriate location of the site which would be agreed with officers in due course as part of a planning application process.

**Matter 9 – Community Facilities and Infrastructure**

- Representor Crossrail seeks greater flexibility for the provision of facilities in Policy INFO10. What is the specific change sought, and does this go to the soundness of the plan?

Policy INFO10 within the submitted DPD document states that where an element of community floorspace is proposed on a strategic site (e.g. the Limmo site), health, childcare and educational facilities are prioritised. The submitted DPD does not justify why these three community facilities have been prioritised above others.

We would like to reiterate our previous representations, as we consider that the submitted DPD demonstrates a lack of flexibility with regards to Policy INFO10 (Locating Community Facilities). We support the Borough’s stance which recognises the importance of community facilities in creating successful places. However, there should be sufficient flexibility to ensure that the most appropriate type of facility is delivered for the location and policy should not impose particular use requirements. This will ensure that community facilities are provided based on evidenced local need and are appropriate to a site’s context.

**Summary**

We support the principle of the Detailed Sites and Policies Development Plan Document that seeks to strengthen and complement the existing Local Plan by adding new and detailed policies to guide development in the borough. In its current drafting however we do not consider the DPD to be sound due to its lack of accordance with national planning policy, in particular the NPPF’s emphasis on positive planning and flexibility. It does not therefore meet the test for ‘soundness’ as set out in the NPPF for the reasons set out above.

Thank you for taking the opportunity to review these additional written representations. Following the submission of these representations, it is deemed unnecessary to verbally participate in the formal hearing but look forward to receiving confirmation of receipt and hope our comments will be taken into consideration.

If you have any queries please contact Adam Conchie (020 7911 2659) of these offices in the first instance.

Yours sincerely

GVA

**GVA Grimley Ltd**

Cc: Jonathan Ring – Crossrail Ltd.