

## Matter 4 – Neighbourhood Policies and allocations

### Site allocations – capacity and trajectory

#### N4 Canning Town

*Q4.6 Are policies N4, N4.SA1, N4.SA2, N4.SA3, N4.SA4 and N4.SA5 justified, consistent with the London Plan, and will they be effective in helping to encourage significant levels of growth and achieve sustainable development in Canning Town neighbourhood? In particular:*

- The assumption that around 700 homes will be built on N4.SA4 between 2028 and 2038.*

The assumption that around 700 homes will be built on the Limmo site allocation (N4.SA4) is a significant under-estimate of the site's full potential development capacity.

Our development partner Ballymore's emerging design-led masterplan for the site is well-progressed and now at pre-application stage. The masterplan assumes over 1,100 homes in Class C3 use alongside 850 purpose-built student accommodation or shared-living homes, with supporting ground floor commercial and community uses and a Riverside Park of approximately 2 hectares.

This is also within a smaller 4.5-hectare red line boundary which excludes the existing Canning Town bus station, as this is not available for development and will not be included in the future planning application.

The Council's Site Capacity Testing Topic Paper does not provide a sufficiently detailed or robust basis on which to base capacity assumptions. Heights have been limited to a maximum of 19-storeys, as shown below.

Figure I – Newham site capacity testing for Limmo (Site allocation N4.SA4)



## Building heights

We consider the Council's approach to tall buildings in the Limmo site allocation is unsound for the reasons set in our Statement on Matter Q3.2 (Tall Buildings). In summary, a maximum height of 20-storeys is not justified, supported by appropriate evidence, positively prepared or deliverable. It would demonstrably fail to optimise the development capacity of the site, taking into account the existing and emerging townscape context and the site's strategic location within the Royal Docks / Beckton Riverside Opportunity Area, adjacent to Canning Town Centre and Canning Town Station.

We have compared Newham's site capacity testing work to the surrounding constructed and permitted residential schemes, which are all comparable to Limmo in Table I. The density assumed by the Council is significantly below what has and is coming forwards in the immediate area. Whereas, by contrast, the emerging Ballymore masterplan (indicative figures) would be much more comparable to the schemes which have actually been delivered which border the site, both within Newham and Tower Hamlets.

Table I – density comparison & surrounding developments

|                                              | Site size (ha) | Homes        | Density dph |
|----------------------------------------------|----------------|--------------|-------------|
| <i>LB Newham Limmo site capacity testing</i> | <i>6.66</i>    | <i>700</i>   | <i>105</i>  |
| <b>Ballymore emerging Limmo scheme</b>       | <b>4.5</b>     | <b>1,500</b> | <b>330</b>  |
| Brunel Street Works development              | 2.48           | 975          | 393         |
| London City Island                           | 4.86           | 1,706        | 351         |
| Good Luck Hope                               | 2.7            | 841          | 346         |
| Crown Wharf                                  | 1.51           | 871          | 577         |
| Manor Road                                   | 2.45           | 804          | 328         |
| Orchard Wharf                                | 1.38           | 695          | 504         |

Our Statement on Matter Q3.2 (Tall Buildings) sets out the deliverability considerations on the Limmo site as well as the strategic planning context in terms of the need to optimise site capacity through a design-led process. In summary, Limmo has a number of abnormal site constraints and infrastructure requirements. Deliverability and viability will require significantly more homes than the 700 being assumed in the Council's Topic Paper. This housing figure should therefore not be relied on or embedded in the site allocation.

## Open space

Our second principal concern with the draft site allocation is the approach to open space requirements. As currently worded, the requirement for a minimum 2-hectare local park to be provided on the Limmo site allocation is considered to be inflexible and has not been justified. Rigid application of this requirement has the potential to constrain the viability and deliverability of development on the Limmo site.

We recognise that there is a strong local aspiration to see the delivery of significant new public space provision in and around the Limmo Peninsula to address local deficiencies. Through the emerging scheme we aim to address this by bringing forward a high quality landscape-led masterplan which delivers a new Riverside Park, which would serve both the new population and the existing population. However, the requirement for a



minimum 2-hectare local park is a rigid, inflexible and arbitrary requirement on what is a very complex and challenging site.

A key consideration should be the quality and function of open space provision and its accessibility, rather than simply the application of a minimum quantum of provision.

As set out in our Reg I9 representation on the draft Local Plan, we consider that the open space requirement on the Limmo site in the draft Local Plan should be reduced to 1.5 hectares for the key reasons set out below.

- There is no need for the entire 2-hectare requirement to be accommodated on the Limmo site allocation to satisfy identified need. Part of the open space requirement could be delivered on adjacent land if this is suitable and deliverable.
- There is a proposal to provide approximately 0.5 hectares of new public open space on land to the south of the Lower Lea Crossing (adjacent to the proposed Limmo allocation site) as part of the Thameside West development. This now has full (detailed) planning permission (LPA Ref: I8/03557/OUT / 24/01507/REM).
- This section of the Leaway Park is partly on TfL-owned land and will contribute towards meeting the need for open space in the area, taking into account both the existing neighbourhoods and planned developments. Furthermore, this land forms the southern section of the existing Limmo site allocation in the adopted Local Plan (2018).
- We therefore consider that the Limmo allocation site should include public open space to address the balance (approximately 1.5 hectares).

We are also concerned about the use of the word '*consolidated*' open space and that this will be interpreted rigidly as requiring a single stand-alone park. Our concern is that this would also potentially constrain the design-led masterplanning process we are undertaking which seeks to optimise the development potential of the site in response to the particular site circumstances, infrastructure and build zone constraints.

#### Brunel Street Works bridge

The Brunel Street Works Bridge is expected to cost approximately £13.5m. Places for London has obtained landing rights for the bridge to the east and we are working towards its delivery. The bridge is challenging to deliver from an engineering perspective, given it needs to be constructed outside of operational hours and avoid impacting overhead pylons. If for any reason it becomes technically unviable or undeliverable, the site allocation supporting text should allow for an alternative acceptable package of transport mitigation measures to be explored and agreed with the Council, TfL and the GLA to enable the development to come forward. This is not expected but we believe an appropriate degree of additional flexibility should be provided.

#### Canning Town Bus station

As stated above, Canning Town bus station has been included within the site allocation boundary. However, whilst this land is in TfL ownership it is not available for development and will not be included in the future planning application. The bus station was not included in our Call for Sites submission.



Whilst our proposals will not prejudice the realisation of the site allocation principles, early delivery should be supported, and it is essential that the Places for London land can be delivered independently and in advance of the other land (incl. Canning Town bus station) that is also included in the allocation area. This should be made clear in the site allocation supporting text. We are mindful that the allocation states that '*the site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.*' In addition, draft Policy BFN2 – *Co-Designed Masterplanning* seeks to resist piecemeal delivery. So we consider that the above change is necessary, as it would ensure we are not unfairly penalised because we are bringing forward a site boundary which differs from the wider site allocation, for example, by having to undertake unnecessary additional design work on the Canning Town Bus Station. The two sites are entirely separate and can be developed without one prejudicing the other.

### Conclusion

In summary, we feel that the housing capacity (700 homes) being assumed for the site allocation is a significant under-estimate of the site's true development potential and this appears to be primarily due to the building height assumptions being applied by the Council in its Site Capacity Testing Topic Paper. We also consider that the site allocation needs to provide greater flexibility on the quantum of open space and infrastructure delivery, given the particular circumstances set out above.

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