Sara Chiong

From: Scott Derben <

Sent: 18 September 2024 13:46

To: Local Plan

Subject: RoDMA Comments on the Newham Reg 19 Local Plan **Attachments:** 20240918 RoDMA Letter on Newham Local Plan.docx.pdf

Follow Up Flag: Follow up Flag Status: Follow up

You don't often get email from

Learn why this is important

Dear Sir or Madam,

Please find attached RoDMA's comments on the Newham Reg 19 Local Plan.

Best Regards

Scott



Scott Derben

Managing Director

T: 0207 511 5086

M: 07711 300132

www.londonsroyaldocks.com

Royal Docks Management Authority | Pierhead | King George V Lock | Fishguard Way| London | E16 2RG

Our Privacy Policy can be accessed at https://londonsroyaldocks.com/privacy-policy/



THE ROYAL DOCKS
MANAGEMENT AUTHORITY

Pierhead, King George V Lock, Fishguard Way, London, E16 2RG Telephone: 0207 511 5086

Planning Policy Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

18 September 2024

Sent via email to: localplan@newham.gov.uk

Dear Sir or Madam,

RoDMA Comments on the Newham Reg 19 Local Plan

- 1. London's Royal Docks are an extremely special body of water. They are central to Newham and wholly contained within the Borough. Other water bodies are passing visitors, the Royals are a permanent resident. When completed they were the biggest artificially enclosed docks in the World. Due to their 5km East-West orientation they are one of the few places in London you can see both a sunrise and a sunset.
- 2. They comprise three main Docks and two attached body of waters which have very different characteristics:
 - Royal Victoria Dock is already a visitor destination in it's own right, a focus for in-water activities, water sports, wellness including the beach in summer and floating vessels comprising food and beverage and hotel uses.
 - Royal Albert Dock a focus for water sports. One of the two non-tidal 2km rowing courses in the south of England. The other one is privately owned and increasingly difficult to access.
 - King George V Dock surrounded by LCY Runway and airport land it is the current operational industrial legacy of the former Port. It stores vessels, barges and ships.
 - Pontoon Dock part of the Silvertown Development, its potential use yet to be determined.
 - Royal Albert Basin the site of the former Gallion's Marina with a craft lock out onto the River Thames. Constrained by the Sir Steve Redgrave Bridge with limited access into

- Royal Albert Dock. A new marina is part of the planning application for the Albert Island Development.
- Pontoon Dock part of the Silvertown Development, there are evolving plans for its use following the development.
- 3. There are areas in the Royal Docks which are a blank canvas for water activation and yet these canvasses will remain blank under the current Local Plan. It fails to understand the inherent flexibility of positioning things on water. This is very different from developing on land, in three distinct ways:
 - (a) physically, uses on water need to float and be anchored;
 - (b) nautical circumstances and exposure make for additional requirements on maintenance and durability; and therefore are usually more expensive than building on land;
 - (c) the inherent nature of a floating object, is that it can always be moved.

This movable nature of uses of water means the 'canvas' can therefore be turned blank once again if it is decided that is what is required. This is not so easy on the land. It is important that the Local Plan recognises this inherently flexible and evolving nature of a dock, by providing a policy framework within which proposals can come forwards and be assessed.

- 4. Royal Victoria Dock (RVD) could be a focus for wellness, physical, emotional and mental health through water activation activities. Wake up Docklands and NOWCA currently located in RVD have start up programmes in this area and could do with more support. As human beings we comprise at least 60% water and are drawn to water in a way that provides an unconscious emotional comfort. Getting close to the water is the key and providing ways for pedestrians to be in closer proximity to the water via floating walkways/pontoons/gardens rather than the dock edge is the key (the dock edge this is usually 1.4m above the water).
- 5. RoDMA are tasked with maintaining, refurbishing and replacing the assets in the Docks. They do this by raising a service charge and also commercial income from operating the Docks. Every penny of profit gets re-invested. RoDMA has plans to increase the level of water activation and recreational use for the benefit of locals and visitors. Water activation in itself is a tenuous commercial model and is rarely successful without food & beverage outlets or other parallel commercial uses attached. RoDMA require other better commercial offerings, such as residential moorings and possibly floating hotels to cross subsidise and offset the limited income received from water activities. It is a careful balance. We need to make it economically possible to activate the water, and we need the Local Plan to provide a policy framework that allows for this. In this respect we note that the London Plan Policy SI17 requires Development Plans to identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.

If one reads the SI16 and SI17 text integrally, it is very clear that the London Plan seeks to find a careful balance between:

Activating the water, and increasing public access and enjoyment of the water;

- While balancing that with other functions, such as navigation;
- While identifying some of the general traits of water bodies (such as: it is not land, it has amazing biodiversity credentials etc); yet at the same time;
- Also underlining the separate and very different characters that different bodies of water have i.e. a large river (such as the Thames) is different from a smaller one (eg the Lea) and again from a Canal; and a small pond is obviously very different from a large Dock.

The latter consideration seems to be overlooked in the Reg 19 Local Plan. This goes to the heart of the need for a bespoke policy approach to the Royal Docks.

- 6. There is limited industrial maritime heritage around the Royal Docks. This could be retrofitted to provide that look and feel of this historical maritime location. The cranes in the Docks were shipped down from Hull for this reason, so there is precedence in this area. Potential heritage items would be much smaller, but dotted about in appropriate locations, like pieces of art.
- 7. The Local Plan should support the consideration of water activation and appropriate development in the Royal Docks where it is sensible to do so and adds to the character and amenity value of the water for the benefit of all.
- 8. We have seen the comments on the Local Plan submitted by the GLA and are in full agreement with them, in particular the recognition of the different and unique characteristics of the docks compared to other water bodies and the suggestion for policy wording promoting the unique role of Royal Victoria Dock and the opportunity for water-related activation and uses.

Yours sincerely,

Signed by email

Scott J Derben Managing Director