

Sara Chiong

From: Michael Holland <[REDACTED]>
Sent: 20 September 2024 11:57
To: Local Plan
Subject: Reg 19 consultation response
Attachments: POP-LT-DV-240912-LPReg19.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Local Plan team,

Please see attached letter.

Michael Holland MRICS
Deputy CEO



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Sent via Email

Email: localplan@newham.gov.uk

12 September 2024

Dear Sir / Madam

Newham Local Plan: Regulation 19 consultation

Thank you for consulting on the Newham Local Plan, Regulation 19 consultation version. The following response is provided on behalf of Populo Living.

Contact details are:

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Populo Living,
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Populo would like to register its wish to participate in the examination of the local plan.

Neighbourhood N1 – North Woolwich

N1.SA1 North Woolwich Gateway

Detailed proposals for this site were approved by Newham’s Dec-23 Strategic Development Committee Dec-23 (Application Number: 22/02662/FUL). The proposed layout in the Local Plan (‘LP’) does not match the approved design for the site. We suggest that the LP entry is updated to match the approved proposals.

N1.SA2 Rymill Street

Whilst the allocation for residential is welcomed, the overall description of development will be unviable to deliver in the context of the wider Plan requirements, most notably the heights of 3-7 storeys to the west and 10 storeys to the east despite being immediately adjacent to a DLR station. This is contrary to the London Plan Policy D1 that states “As change is a fundamental characteristic of London, **respecting character and accommodating change** should not be seen as mutually exclusive” and that “the density of development proposals should be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services”

The site offers an opportunity to deliver significant scale and massing due to various positive attributes such as access to public transport, no residential units to the north so limited impact on existing dwellings direct sunlight, and existing precedence for height with two 19-storey towers immediately southwest of the site.

From our work in North Woolwich, we are aware that the City Airport limit would be c.50m height, or approx. 15 storeys. We suggest this would be a more reasonable limit for a development in an area in need of new development and rejuvenation. The Plan outlines key social infrastructure that is required (food store, NHS health centre, local employment space), which will only be viable to deliver if a critical mass of housing can be provided to both pay for the initial construction and then sustain the businesses with footfall.

The draft site layout also suggests a green open space cutting the site in two, creating a north-south link to the DLR station through a ‘pocket park’ that should also ‘prioritise community growing opportunities’. This appears to ignore the substantial difference in levels between Rymill Street and the DLR station, which would make it difficult to achieve all these objectives.

Populo has discussed the site layout with the TFL DLR team and we consider there is an opportunity to better integrate the station with the Local Centre in line with the aspirations of the Plan, however it will require substantial investment, further supporting greater height on the site.

Neighbourhood N8 – Stratford & Maryland

N8.SA3 Greater Carpenters District

The current height allocations are overly prescriptive and do not fully align with the approved LLDC Carpenters masterplan. We suggest a use of more generic height descriptions, to ensure plans can evolve to reflect the changing regulatory environment.

Rex Site

The draft LP shows the Rex building as being locally listed, however we don't believe this is correct. Historic England have recently dismissed an application to give the building Listed status and we have applied for a Certificate of Immunity (COI) against further listings on behalf of the Council. We are concerned that locally listing the building could prevent its rejuvenation and future protection, as new operators will need to alter the building to make it safe and fit for purpose, and may be put off from investing in the building if they are likely to meet resistance.

For reference, Newham Council has recently approved a strategy to lease the building to an entertainment operator.

The Bridge Road part of the site allocation appears to have a height limit of between 21 and 32 meters, despite recent pre-app and DRP meetings where elements at 15 storeys (c.55m) were agreed in principle. The Plan approach will be unviable to deliver the scheme in line with policy BFN2 if the height restrictions are enforced as they are currently drafted in the Plan. We suggest the LP entry is updated to reflect pre-application advice.

Neighbourhood N9 – West Ham

N9.SA1 Plaistow North

The site allocation contains a requirement for a new bridge to be installed over Network Rail and TFL train tracks. There is already a link to the south of the tracks and this infrastructure is considered unnecessary, expensive and unlikely to be viable to deliver alongside other LP policy expectations. It is suggested that alternative interventions should be considered that are less costly and more in-keeping with Secure by Design principles.

Neighbourhood N11 – Beckton

N11.SA1 East Beckton Town Centre

Whilst we largely agree with the ambitions set out in the Plan description (less dominated by parking, a town centre setting, improved social infrastructure), the requirements and limitations set out do not reflect the financial implications of achieving this. Most notably, a new leisure centre and reorganising the supermarket store and parking to unlock development is expensive and will make this challenging to deliver. The overall description of development will be unviable to deliver in the context of the wider Plan requirements, most notably the limited heights despite being immediately adjacent to a DLR and major bus station. Therefore, it will be unviable to deliver this site allocation without an increase in height and scale of development.

We would suggest a much higher upper-limit to the tall building zones of 75m, with much wider areas covered. The current height allocations are contrary to the London Plan Policy D1 that states “As change is a fundamental characteristic of London, **respecting character and accommodating change** should not be seen as mutually exclusive” and that “the density of development proposals should be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services”. Height would also appear to be more suitable to the south of the site to avoid overshadowing existing residential to the north.

N11.SA2 Cyprus

Detailed proposals for this site were approved by Newham’s Dec-23 Strategic Development Committee Dec-23 (Application Number: 23/00840/FUL). The proposed layout in the LP does not match the approved design for the site, so it is suggested that the LP entry is either updated to match the above proposals or removed from the LP.

Michael Holland MRICS
Deputy CEO