

Sara Chiong

From: Mike Bottomley <[REDACTED]>
Sent: 20 September 2024 13:10
To: Local Plan
Cc: [REDACTED]
Subject: P08705 - Beckton Retail Park - Local Plan Reg 19 Representations
Attachments: P8705 Beckton Retail Park Newham Reg 19 Local Plan Reps Final-1.0.pdf

Follow Up Flag: Follow up
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Dear planning policy team,

Please find attached representations submitted on behalf of LAMIT c/ CCLA Investment Management Ltd regarding the following site:

Beckton Retail Park,
Alpine Way,
London,
E6 6LA

Please can you confirm receipt of these representations?

Kind regards

MIKE BOTTOMLEY
SENIOR PLANNER
DD [REDACTED]

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

20 September 2024

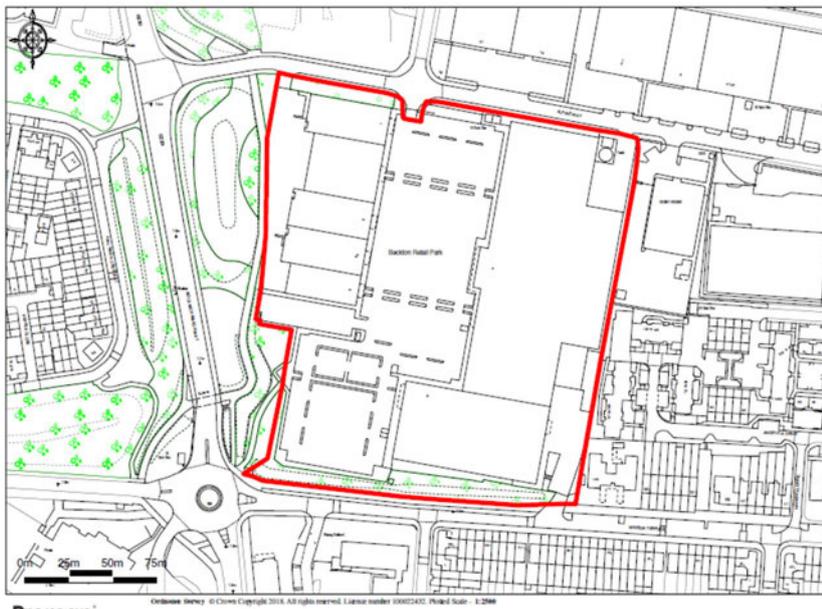
P08705 - Beckton Retail Park, Alpine Way, London E6 6LA Newham Regulation 19 Draft Submission Local Plan - Consultation Representations

Rolfe Judd Planning have been appointed by LAMIT c/ CCLA Investment Management Ltd to advise on planning matters relating to their property at Beckton Retail Park. We understand that LB Newham are currently undertaking a Regulation 19 consultation on the Draft Submission Local Plan until Friday 20th September 2024 and we are writing to submit the following comments on behalf of our client.

Background

Site Location

Beckton Retail Park is located in the south-east of Newham Borough, to the south of Alpine way, east of Woolwich Manor Way and north of Windsor Terrace.



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Current Allocation

Newham adopted the current Local Plan in 2018, which contained allocation S02 'Alpine Way'. This allocation proposes a mixed-use neighbourhood, consolidating the neighbourhood centred on Winsor Terrace and incorporating employment uses along Alpine Way to complement the Strategic Industrial Location (SIL) to the north and east. The predominantly residential area in the southern portion of the site will have dedicated access, with improved links to East Beckton town centre and the surrounding residential areas to the east and west. Indicative building heights range from 6 to 8 storeys.

The following designations are also relevant to the redevelopment of the retail park:

- E01/J01: Employment Hub allocation, covering the northern third of the site and the wider area to the north, west and south-east of the retail park.
- GS246: Small open amenity space with SINC designation along the western boundary of the site.
- GS257: Landscape buffer with SINC designation on the southern boundary of the site.

Draft Proposals

The site was the subject of detailed discussions with London Borough of Newham in 2018 and early part of 2019 regarding a mixed-use development for commercial, employment and residential uses. Whilst the scheme design was not fully developed, the principles of the scheme were supported by Newham and the GLA. This support came partly from the site allocation S02 for the site for mixed use development as set out in the 2018 Local Plan which is referenced above. Due to the economic conditions at the time, a number of long dated occupational leases and then Covid, the scheme was not progressed any further.

A subsequent pre-application meeting was held with LB Newham on 2nd August 2024 with an updated proposal in response to the proposed re-insertion of the Alpine Way site allocation and market conditions improving. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the western and southern areas of the site in 2026 and the entire site in 2028.

The scheme prepared by Rolfe Judd Architecture (RJA) allows for the southern side of the site to be developed as Phase 1, and then the western side to be developed as Phase 2 and whilst this is occurring, the eastern side will remain trading as retail until lease expiry.

This approach would allow for a phased delivery programme, with Phase 1 and 2 delivering approximately c.650 residential units over a 5 to 6 year build out programme. This would then allow for the implementation of the eastern Phase 3 and 4 delivering a further c.450 residential units and commercial/light industrial space.

The response to these proposals was generally positive, with the principles of a mixed-use scheme being considered acceptable on the basis that they accounted for the site allocation and draft local plan. The overall massing and layout were also considered appropriate for the site but the approach to providing a buffer between the proposed residential to the south of the site and SIL to the north and east would need to be carefully considered as the designs progress.

The outline proposals and feedback have been set in more detail below where relevant to the emerging policies in the Local Plan.

Removal of Site Allocation

The Regulation 18 draft local plan did not include a site allocation for Beckton Retail Park. On 25 January 2023, the Newham planning policy team confirmed that the site had been removed from the emerging local plan due to insufficient information regarding its availability, suitability, and deliverability.

In our representations submitted on 20 February 2023, we promoted the re-insertion of the Alpine Way site allocation into the local plan, on the grounds that the site is wholly appropriate as a site allocation because it is:

- Deliverable
- Suitable
- In line with the LB Newham Characterisation Study
- Would support the SHMA in delivering new homes
- Located adjacent to East Beckton District Centre
- Within a Tall Building Zone

As set out in the representation, LAMIT wished to:

1. Promote the re-insertion of a site allocation for mixed-use development on Beckton Retail Park on the basis that the site is available, suitable for development and deliverable.
2. Support 'D4: TBZ4 Beckton Tall building zone' and promote the extension of the 40m zone to include the south-western corner of Beckton Retail Park.
3. Support Draft Policy N11: Beckton and clarify the range of uses acceptable under a mixed-use redevelopment proposal.

Key Emerging Policies

The following draft policies are relevant to the Alpine Way site:

Policy N11 (Beckton) outlines a vision to transform the neighbourhood with a focus on enhancing connectivity, reducing car dependency, and improving green spaces. It encourages moderate increases in housing density while respecting local character, particularly in areas like Winsor Terrace. Key goals include reconfiguring the East Beckton District Centre for better retail and leisure services, improving walking and cycling routes, and expanding industrial use in certain areas. Additionally, it aims to create a safer, more walkable environment through better street layouts and enhanced public transport links, while addressing environmental concerns such as flood risks and air quality.

N11.SA3 (Alpine Way) designates the site for development including residential and employment uses, as well as the provision of new open space. The employment uses are expected to prioritize light industrial functions, warehouses, and storage facilities, aligning with Policy J1. The development must address flood risk, particularly from surface water, and ensure mitigation measures are in place. Building heights are planned to range between 3 to 13 storeys, with taller buildings positioned to create a gateway to the site. Additionally, the design should include green space, protect local heritage, and improve walking and cycling connectivity.

D4.TBZ4: (Tall buildings - Beckton Tall Building Zone) cover the area around the Windsor Terrace/Woolwich Manor Way roundabout and includes the entirety of the Alpine Way site. The policy states that prevailing building heights are generally expected to range from 9 to 21 meters (approximately 3 to 7 storeys). The policy allows for limited taller building elements up to 32 meters (around 10 storeys) to mark key areas, such as the centre of the town. There is also provision for buildings up to 40 meters (approximately 13 storeys) near the Beckton DLR station, which includes the south-western corner of the Alpine Way site. The policy emphasizes

careful height transitions to ensure harmony with surrounding developments and higher-density areas.

GWS1 (Green Spaces) includes the Alpine Walk, Windsor Terrace Landscape Buffer and Beckton Alps to the south and west of the Alpine Way site. The policy focuses on protecting, enhancing, and improving access to high-quality green spaces across Newham. It ensures no net loss of green spaces, maintaining their character while improving functionality, connectivity and accessibility.

GWS3 (Biodiversity, urban greening, and access to nature) emphasizes the importance of enhancing biodiversity, urban greening, and public access to nature in Newham. For the Beckton Alps SINC, the policy prioritizes the protection of existing habitats, improvement of green corridors, and biodiversity net gains in development. The site is located in an area deficient in access to nature, underscoring the need for ecological enhancements and new public green spaces.

CE7 (Managing flood risk) focuses on ensuring that all new developments in Newham assess and mitigate flood risks from all sources, including tidal, fluvial, and surface water flooding. A small portion of the Alpine Way site falls under Flood Zone 2/3, however this only relates to the south-western corner of the site that is protected as green space under draft Policy GW3. The developable area of the site is not within a flood zone.

J1 (Employment and Growth) provides the framework for promoting inclusive, green economic growth by supporting industrial and office developments across the borough. The London Industrial Park, located directly to the north and east of the Alpine Way site, is identified as a Strategic Industrial Location (SIL), prioritizing large-scale industrial uses such as warehousing, logistics, and food and drink production.

HS1 (Newham's Town Centres Network) outlines the strategy for its Town Centres Network, focusing on accessibility and service provision. East Beckton Town Centre is classified as a District Centre, serving local needs for retail, leisure, services, and community activities. It is one of Newham's six largest town centres. The plan emphasizes improving the leisure offerings in East Beckton to complement its current retail focus and meet the growing demand for community services.

N11.SA1 (East Beckton Town Centre) is located directly to the south-west of the Alpine Way site. The site allocation outlines the reconfiguration and enhancement of the East Beckton District Centre to provide a mix of residential, retail, and social infrastructure, including a health center, community facilities, sports, and open spaces. The policy emphasizes maintaining retail spaces while introducing leisure and cultural activities to support a local evening and night-time economy.

Representations

We would like to submit representations to the Regulation 19 Draft Submission Local Plan consultation in response to the following draft policies:

1. Support N11.SA3 Alpine Way, with proposals for updates and clarifications in the allocation based on the latest designs discussed with the council at pre-app.
2. Support 'D4: TBZ4 Beckton Tall building zone' and the inclusion of the south-western corner of the Alpine Way site allocation within the 40m zone, but request that opportunities for additional height are explored on the site to maximise housing delivery.
3. Support Draft Policy N11: Beckton and clarify the range of uses acceptable under a mixed-use redevelopment proposal.

N11.SA3 Alpine Way

Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:

Quantum of Development

The draft site allocation does not specify any quantum of development, but the recent design work completed by RJA builds upon the work undertaken in 2018 to give an indication of the site capacity.

The proposed scale and density of the scheme have increased since 2018. This is partly due to issues such as second stairs and increased sustainability credentials, but also in response to the renewed NPPF focus to make efficient use of brownfield land. Issues related to cost of inflation and other viability factors affecting the building industry also require greater density be delivered to support viability.

The proposed increased density on this site would deliver over 1,100 homes for the borough. This would assist the Council in delivering homes to meet London Plan housing targets. The SHMAA identifies the target for housing delivery in Newham as 4,760 dwellings per annum. Draft policy H1: Meeting housing needs, states that the Borough will enable a net increase of between 51,425 and 53,784 quality residential units between 2023 and 2038, equating to between 3,428 and 3,585 homes per annum assuming a 15-year plan period, falling short of the London Plan housing target.

We request that the draft policy recognises this potential to make a significant contribution to the Boroughs housing targets.

Strategic Industrial Location Buffer Zone

The draft allocation states that industrial and employment floorspace should be located in the northeast of the site to provide a buffer to the Strategic Industrial Location (SIL). Non-residential, stacked industrial buildings are considered the most appropriate typology for this buffer. The site's design and layout should include public realm enhancements and avoid orienting habitable rooms and amenity spaces toward industrial uses.

The most recent proposals suggest integrating residential areas with industrial zones using a hybrid scheme, similar to a previous example from 2018. In that project, a single strip of workspace was placed above a large ground-floor and mezzanine retail unit to serve as a buffer, allowing residential development in the remaining parts of the block. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units were designed in small clusters. These units could either function as industrial spaces or be converted back to residential use, depending on future needs.

An alternative approach would involve replacing large retail units with townhouses or flats that back directly onto commercial B1 units. This would create a buffer where the commercial units face the industrial area, while the residential units face south toward the main site, forming a street and accommodating future residential phases. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units have been designed and built, with future residential units facing away with complete and successful separation of uses.

This flexibility would allow for residential development adjacent to industrial zones while maintaining compatibility with the industrial environment. It also maximizes residential use in a corner of the site without compromising the adjacent SIL area. As the project progresses, the design will evolve to address safety and

dual-aspect requirements.

This aligns with the 'Agent of Change' principle set out by London Plan Policy D13, which aims to ensure that existing industrial operations are not disrupted by introducing new residential development.

Overall, we recognize the need to protect future residents' amenities while avoiding any compromise to the SIL's function, but there are several potentially acceptable solutions for introducing residential units into the industrial buffer zone, while maintaining compliance with London Plan Policy D13. We request that the site allocation be updated to acknowledge that residential uses within this buffer zone can be considered acceptable, provided that compliance with Policy D13 is achieved.

Building Heights

The draft allocation states that building heights should range between 9-21m (c.3-7 storeys) with taller buildings up to 32m (c.10 storeys) and 40m (c.13 storeys) to the west to add wayfinding and to mark the gateway to the site. Massing should step down towards the east-south of the site to sensitively integrate with the heritage assets. The response to draft Policy D4: TBZ4 Beckton Tall Building Zone addresses building height on the Alpine Way site allocation.

Street Hierarchy

The draft allocation states that the design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy, enhancing walking and cycling links north to south to Beckton Alp and enhancing pedestrian connectivity to East Beckton Town Centre and residential uses across Woolwich Manor Road to its west and Winsor Terrace to its south. The layout should also future proof east/west routes knitting to the urban fabric to the east of the site. Development should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, framing a central public space.

We recognize the importance of any future development on the Alpine Way site enhancing connectivity and reinforcing the existing street network. However, we are still in the early stages of developing a masterplan and have not yet determined the location of blocks within the site. Therefore, we request that the key on page 544 of the draft Local Plan be amended to read, '*Key site access points and indicative key routes*'.

Development Delivery Timescale

The draft allocation states that scheme is likely to be delivered in the medium to long term. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the western and southern areas of the site in 2026 and the entire site in 2028. The current approach would allow for a phased delivery programme, with Phase 1 and 2 delivering approximately c.650 residential units over a 5 to 6 year build out programme. This would then allow for the implementation of the eastern Phase 3 and 4.

In summary, we support draft Policy N11.SA3, but request the following amendments:

1. Recognize that the site allocation has significant capacity to contribute to the Boroughs housing target through increasing density on a brown field site.
2. Allow for residential development within the buffer zone on the basis that London Plan Policy D13 Agent of Change is fully complied with.
3. The key on page 544 of the draft Local Plan be amended to read, '*Key site access points and indicative key routes*'.

D4: TBZ4 Beckton Tall Building Zone

In our response to the Regulation 18 Local Plan consultation we proposed amending the policy map to extend the 40m zone of TBZ4 to include the south-western corner of Beckton Retail Park.

Draft Policy D4.TBZ4: (Tall buildings - Beckton Tall Building Zone) allows for limited taller building elements up to 32 meters (around 10 storeys) to mark key areas, such as the centre of the town. There is also provision for buildings up to 40 meters (approximately 13 storeys) near the Beckton DLR station, which includes the south-western corner of the Alpine Way site. LAMIT c/ CCLA Investment Management Ltd support the extension of the 40m zone to include Alpine Way.

We suggest that the Council is more ambitious in regard to the maximum height allocation. The design work carried out in 2018/2019 established that across the majority of the site articulated blocks between 4 and 10 storeys (c.32m) would be appropriate, however taller elements of between 12 and 15 storeys (c.46m) would be appropriate along the western boundary with Woolwich Manor Way, with a taller 15 to 18 storey (c.55m) cluster in the south-western corner of the site, adjacent to the Woolwich Manor Way/Winsor Terrace/Tollgate Road roundabout.

The new Labour government has proposed changes to the NPPF, emphasizing that local planning authorities should give significant weight to the benefits of delivering as many homes as possible, especially on previously developed land. Since the 2018/19 scheme was developed the new London Plan has also been adopted and we believe this updated planning context provides an opportunity to propose a series of taller buildings than before.

We consider a height of around 20+ storeys to be appropriate for the south-west corner of the Alpine Way site. This increase would contribute to addressing the shortfall in housing and represent a suitable clustering of taller buildings, aligning with the N11.SA1 East Beckton Town Centre allocation. We strongly encourage the Council to consider increasing the height limit within the 40m zone and extending this along the western boundary of the site.

N11 Beckton

This policy sets out the neighbourhood profile and sets out a vision for Beckton.

Part 7 of the policy supports the intensification of existing retail and leisure parks for industrial, logistics and distribution and related functions as part of mixed-use development. We support the principle of introducing mixed-use development on existing retail parts, but request that this wording is adjusted to acknowledge that mixed-use development can include residential, retail and commercial elements, in addition to the industrial, logistics and distribution uses referenced by policy.

S14: Education and childcare facilities

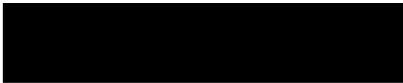
Paragraph S14.1 of this policy makes reference to 'N11.SA3 Royal Road'. This should read 'N4.SA4 Royal Road'.

Conclusions

In conclusion, LAMIT c/ CCLA Investment Management Ltd welcome the inclusion of Site Allocation N11.SA3 (Alpine Way), designated for development including residential and employment uses, as well as the provision of new open space. We consider there to be significant capacity to deliver over 1,100 homes on this brownfield site to contribute the to Borough housing targets. Given the encouragement in national planning guidance and through the London Plan we consider there to be an opportunity for a series of taller buildings than previously proposed and we encourage the Council to take a more ambitious in regard to the maximum height allocation.

We look forward to participating in future Local Plan consultations prior to adoption.

Yours faithfully

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For and on behalf of
Rolfe Judd Planning Limited