

**Sara Chiong**

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**From:** Alasdair Buckle <[REDACTED]>  
**Sent:** 20 September 2024 15:04  
**To:** Local Plan  
**Cc:** [REDACTED]  
**Subject:** Newham Local Plan - Regulation 19 consultation - Representations  
**Attachments:** TSP Representations - LB Newham Regulation 19 Local Plan - September 2024.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good afternoon

Please see attached representations prepared on behalf of The Silvertown Partnership LLP.

Please can you confirm receipt and let us know if you have any queries.

Kind regards

**Alasdair Buckle**

Director

direct: [REDACTED]

mobile: [REDACTED]

e-mail: [REDACTED]

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**Response Form for Regulation 19 Consultation.**

	<p><b>Local Plan</b> Publication Stage Response Form</p>	<p><b>Ref:</b></p> <p><b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation  
relates:**

Newham Draft Submission  
Local Plan

## Privacy Notice

### Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Newham Local Plan Review Consultation (Regulation 19). It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

### What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

### Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

### The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

### How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

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Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public.

At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other personal information will remain confidential.

Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

### **Who we will share your data with**

We will only share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

### **How long we will keep your data**

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

### **How do we protect your data**

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

### **Know your rights**

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: [dpo@newham.gov.uk](mailto:dpo@newham.gov.uk)

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# Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

### 2. Agent's Details (if applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Alasdair"/>
Last Name	<input type="text"/>	<input type="text" value="Buckle"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="The Silvertown Partnership LLP"/>	<input type="text" value="DP9 Limited"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text" value="C/O Agent"/>	<input type="text"/>
Line 4	<input type="text" value="C/O Agent"/>	<input type="text"/>
Post Code	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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## Part B – Please use a separate sheet for each representation

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Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the  
Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please see Appendix A for more information.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see Appendix A for more information.

(Continue on a separate sheet /expand box if necessary)



***Please note*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please see Appendix A for more information.

***Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.***

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

**Please return to London Borough of Newham by 5pm 6<sup>th</sup> September 2024**

## Appendix A

CAG/AB/HZW-DP6814

20 September 2024

Local Plan Team  
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Sent via email to: [localplan@newham.gov.uk](mailto:localplan@newham.gov.uk)

Dear Sir/Madam,

**SILVERTOWN QUAYS, NEWHAM, LONDON  
NEWHAM DRAFT LOCAL PLAN (REGULATION 19) CONSULTATION**

On behalf of our client, The Silvertown Partnership LLP (TSP), please find enclosed representations to the Regulation 19 (pre-submission) Consultation on the draft Newham Local Plan Review.

TSP is bringing forwards the residential-led mixed-use redevelopment of the Silvertown strategic development site in the Royal Docks. The Site is within the Royal Docks and Beckton Opportunity Area and benefits from a strategic site allocation (S21) in the existing Newham Local Plan (2018), in addition to an existing Outline Planning Permission (OPP) (approved in 2016 – ref. 14/01605/OUT) and Phase 1 reserved matters approval (approved in 2019 – ref. 19/02657/REM) as well as other more minor reserved matters approvals. TSP commenced the delivery of homes on site under the OPP in 2023 and the OPP with its approved quantum of floorspace remains deliverable across the Site. Concurrently, a Hybrid Planning Application (HPA) (ref: 22/02855/OUT) has been submitted for the site, which once approved will supersede all existing permissions and will enable a significant increase to the delivery of homes on site whilst also providing other planning benefits.

We have submitted representations on behalf of TSP at the previous two stages of Regulation 18 (issues and options) Consultation, in December 2021 and February 2023, and these representations draw on our previous representations where relevant.

These representations have been set out in two parts. The main representations are contained within this letter and comprise the key strategic representations of TSP. Within **Appendix A**, a series of further detailed comments are provided, supported by proposed amendments to key policies.

**Silvertown Hybrid Planning Application - Overview**



The HPA is for the strategic regeneration of Silvertown Quays, which is a site allocation (S21) in the adopted Local Plan and an emerging Site Allocation in the Regulation 19 draft Local Plan (N2.SA1). The HPA will supersede the current implemented planning permission for the Site - the OPP and its associated Reserved Matters approvals - and will enable the delivery of a new and improved vision for Silvertown which demonstrates that it is a positive example of development which is in line with the broad aspirations of the emerging Local Plan. The HPA has been in development for several years, well in advance of the first consultation on the emerging Local Plan in December 2021.

The HPA will result in wide-ranging planning benefits. The HPA is for the transformative residential-led mixed use regeneration of one of the largest and most strategically important sites in the Royal Docks and London as a whole; a site in public ownership that has been derelict and largely disused for circa 40 years. The HPA will contribute significantly towards LBN's housing targets by including residential floorspace that is expected to provide approximately 6,500 homes, representing an increase of around 3,500 new homes compared to the OPP (which approved c.3,000 homes).

The HPA will create considerable employment opportunities across a range of sectors. This will start at construction stage with the creation of a range of construction jobs. The HPA has created Mills Quarter which is centred around the refurbished and extended Millennium Mills building where flexible workspace is proposed for a mix of office, learning and education, exhibition, museum and research and development uses. To the east of Millennium Mills is Silverworks, where flexible workspace/makerspace is proposed intended for light industrial, film studio and office uses. To the south, fronting North Woolwich Road, opportunities for business incubation and micro-scale coworking are identified.

The HPA will create extensive community facilities and social infrastructure including land for a new primary school on-site, along with floorspace for new healthcare facilities, nurseries and community uses, all secured by a Section 106 Agreement. Significant financial contributions will also be made via the Section 106 Agreement and the Community Infrastructure Levy (CIL).

A significant amount of green infrastructure is proposed, centred on a series of defined Open Spaces ranging from public squares to public parks. In addition, there will be several smaller green spaces and an array of play spaces suitable for children and young people of all ages. The HPA will also be in line with biodiversity net gain requirements and urban greening that respond to the site's current features, including on the green roofs that are proposed sitewide.

The HPA has been designed to minimise its carbon footprint. The Site will be net zero in operational carbon and will have climate change resilience embedded into its built form. The Proposed Development will promote renewable energy generation, decentralised energy networks, sustainable drainage, substantial urban greening delivering biodiversity net gains, and the circular economy including adaptability. It will be an exemplar of a highly sustainable modern, large-scale mixed-use development.



## Main Representations

TSP's main representation is that the proposed policies, particularly in relation to the Silvertown Quays site allocation (N2.SA1), should be consistent with the HPA proposals. The HPA has been the subject of extensive consultation and engagement between TSP, the Council and various other stakeholders over a number of years and is at a relatively advanced stage of determination. Promoting draft policies that are fundamentally inconsistent with the HPA proposals for the Silvertown Quays site would therefore be unsound and would undermine the significant work that has already been undertaken between TSP and the Council's development management officers.

The main representation is expanded on below in relation to specific policies under the following headings:

1. Spatial Strategy / Key Strategic Policies
2. Royal Victoria Area / Site Allocation
3. Affordable housing (tenure and mix) and Design policies
4. Development Management Policies

We have linked back to our representations on the Regulation 18 Local Plan, as required, throughout. Appendix A includes more detailed representations including proposed track changes to policy.

### 1. Spatial Strategy / Key Strategic Policies

As with our representations at Regulation 18 Stage, TSP welcomes **Draft Policy BFN1** which sets out the Spatial Strategy for the Borough. TSP agrees that a significant amount of growth should be directed to the Royal Docks and Beckton Riverside Opportunity Area and fully supports the increase in the homes and jobs targets in this area when compared to the Regulation 18 Local Plan. The revised targets of 36,000 new homes (from 30,000) and 55,000 new jobs (from 41,500) up to 2041 are aligned to the GLA's Royal Docks and Beckton Riverside Opportunity Area Planning Framework (2023) and should be fully supported.

**Draft Policy J1** sets out the need to support diverse, inclusive and green economic growth to deliver more jobs within Newham over the plan period to 2038. As with the comments provided at Regulation 18 stage, TSP agrees with the core messaging of the policy as it aligns with the NPPF (2023, and consultation draft amendments to the NPPF) to support economic growth. This policy sets out the approach to enable, grow and diversify Newham's economy whilst encouraging the provision of high-quality development.

**Draft Policy H1** demonstrates the Council's prioritisation of delivering homes which aligns with central Government's substantial housing delivery targets. It is noted that there has been an increase in the housing targets as set out in this policy from Regulation 18 to Regulation 19, which TSP strongly supports and notes the important role of the Local Plan's site allocations in achieving this target. In summary, TSP strongly supports the Spatial Strategy which is consistent with the HPA proposals.



## **2. Royal Victoria Area / Site Allocation**

TSP welcomes the retention of a site allocation for Silvertown which has featured in all drafts of the emerging Local Plan. The allocation confirms its status as a strategically important development site in the Borough.

TSP generally supports the updates made to the Vision (N2) for Royal Victoria to provide stronger references to the delivery of a Local Centre at Silvertown. The changes to make the vision for the Local Centre less prescriptive in terms of floorspace is supported. There remains reference to Impact Assessments for retail uses in the wording of the Vision. As part of the HPA, TSP have undertaken Impact Assessments to support the application which are considered to have fulfilled this expectation. In summary TSP supports the Vision for Royal Victoria contained in the draft Local Plan. Detailed representations on the emerging Site Allocation are set out as follows, aligned to each section of it.

### Silvertown Quays Site Allocation (N2.SA1): Map

The Map is not aligned with the longstanding HPA Illustrative Masterplan for Silvertown in respect of the location of the Local Centre and the layout of open spaces. The HPA proposals for Silvertown have been subject to several years of engagement with LBN, including its Design Review Panel, the GLA, and wider specialists including Urban Shape. The focus of town uses within the Silvertown proposals covers a larger area than shown, expanding west (to Silvertown Avenue in the Masterplan) and north to Mills Quarter. Much of these town centre uses already have full Planning Permission and could be implemented under the OPP. To be accurate, the Site Allocation map should reflect the Illustrative Masterplan for Silvertown, which it currently does not do. It is essential that the Map is amended to align it to the HPA proposals.

### Silvertown Quays Site Allocation (N2.SA1): Development Principles

TSP agrees with the broad messaging of the Development principles of the Site Allocation in terms of the land uses that should be delivered on Site, in that the HPA is aligned to the expectation to provide residential, employment uses, main town centre uses and social infrastructure, including community facilities, sports and recreation facilities, education, and open space.

The latest draft development principles include new wording which requires proposals to “prioritise industrial floorspace” on site. The current Local Plan site allocation does not include this requirement, and nor did the Regulation 18 drafts of the Local Plan. The Illustrative Masterplan for Silvertown includes industrial floorspace in the proposed ‘Silverworks’ district to the east of the Site. This proposal supports the delivery of a balance of uses across the site and is important to the placemaking principles for Silvertown. However, in the absence of any supporting justification for the inclusion of wording that requires proposals to prioritise industrial floorspace on site, we do not consider that it is necessary for there to be a specific requirement to prioritise industrial floorspace over other uses, and propose that this wording is removed while retaining industrial use as one of several employment uses that are welcome on site as part of a balance of uses across it. This request is reflected in our proposed amendments to the site allocation contained at Appendix A. It is a key need for the project to maintain



flexibility of permissible land uses in order to maintain momentum of delivery as market cycles change. The HPA enables this with its proposed minimum and maximum parameters to be controlled by condition, and the site allocation should align to the proposed HPA area schedule, which does not advocate a minimum industrial floorspace allowance.

The reference to a need for the new Silvertown Local Centre to provide a food store is supported, and it is noted that an impact assessment for this food store forms part of the HPA documentation.

The reference to support for community facilities is welcomed, but it is considered that this should not solely relate to the Local Centre as community facilities are not always 'town centre uses' and are proposed across the Silvertown site, as part of the placemaking strategy for it. For example, the proposed Primary School location in the Illustrative Masterplan is not within the Local Centre on site.

The reference to support for the delivery of sport and recreation facilities is also welcomed, but this should not be restricted to only water-related uses because there is a benefit to delivering a range of sport and leisure uses on site for future residents and the wider Royal Docks community. An example of this is the proposed sports pitches within the Illustrative Masterplan. The support for food and beverage uses around the water is welcomed.

### Design Principles

The policy text states that building heights should range between 21-32m (ca 7-10 storeys) with some buildings being as tall as 50m in height (c. 16 storeys). It is assumed that these heights are measured by reference to Above Ordnance Datum (AOD) but this should be confirmed. It is necessary to include the word "generally" prior to the height range, to acknowledge that there will be some buildings that fall outside of this range, such as Plot 6 (under construction) and the three storey townhouses in Plot 2D (part of the detailed component of the HPA), which are all below 18m in height, and taller buildings which are expected by the design principles. The maximum height should be increased to 55.9m AOD as this is the maximum height of the approved proposals for Millennium Mills, which will be the tallest building on Site.

References to the location of Main Town Centre uses should continue to refer to North Woolwich Road, but reference should also be added to this expanding up to Millennium Mills across the west of the Site, which is in accordance with the longstanding proposals for Silvertown which have been subject to extensive consultation as part of the development of the HPA.

There should be no reference to industrial workspace or creative production maker space uses being located towards Millennium Mills. This has never been part of the proposals for the Site, which includes industrial uses to the east in 'Silverworks' in the Illustrative Masterplan, and there is no evidence to support this requirement. Millennium Mills is proposed to be used as a flexible workspace with ancillary active uses, but not for industrial purposes.

### Infrastructure Requirements





TSP supports the requirement to address open space deficiency within the local area. The HPA proposes the delivery of a minimum of 4.151 hectares of open space across the masterplan, distributed across a range of different types of spaces including public squares, parks and smaller green spaces. However, the requirement for a 'consolidated local park with a minimum area of 2 hectares' should be removed as this is inconsistent with the HPA masterplan. A single local park is not considered to be the most effective means of addressing open space deficiency in the area because it would not provide the diversity of green / open spaces required across the development site which will provide variety and convenient accessibility to future residents and the wider Royal Docks community. It is also considered that the policy should not specifically require prioritisation of community growing facilities over other forms of open space, as space for play and recreation are vital to providing for the future community on site.

The HPA commits to providing 10sqm of playspace per child resident on site as part of the open space provision, but the details of this will be subject to detailed design and the site allocation should not refer to specific types of play space as the current draft site allocation does (Locally Equipped Area for Play / Local Area for Play).

With regard to the proposed requirement for a vacuum waste collection system, emerging policy W3 Part 8 states that vacuum waste collection systems should be discussed at an early stage of design with the waste and recycling team and is not a requirement. This has not occurred at Silvertown Quays in respect of the HPA, which does not have a proposal for a vacuum waste collection system, and therefore references to this should be removed.

The HPA proposes land for the delivery of a Primary School of up to four forms of entry, in accordance with the emerging Site Allocation. Likewise, a significant allowance for early years childcare forms part of the HPA.

TSP supports the expectation that a contribution is made towards the upgrade of Pontoon Dock Station, and has expressed its desires that any financial contributions made to Transport for London as part of a future Section 106 Agreement prioritise this project.

At Appendix A, we have included a track changed version of the proposed site allocation reflecting the above comments.

### **3. Affordable housing and dwelling mix and Design policies**

**Draft Policy H3** sets out the Council's approach to securing affordable housing delivery. Whereas the Regulation 18 draft Local Plan Policy was aligned to the London Plan requirements for affordable housing delivery, which was strongly supported in TSP's representations at the time, the Regulation 19 draft Local Plan introduces a requirement for 60% affordable housing by unit, comprised of 50% social rent and 10% affordable home ownership. Although it is acknowledged that the ability to meet the requirement can be viability tested, it is considered that this move away from the London Plan to more significant requirements is detached from the reality of housing delivery in the current environment, where housing completions in London have reduced on account of viability, attributable



to a range of factors. It should also align to the London Plan requirement for ‘low cost rent’ which can be either London Affordable Rent or Social Rent, rather than solely Social Rent, and “Intermediate” as the recognised definition of “affordable home ownership”. Although less of a strategic issue, the discrepancy between the use of habitable rooms as a measure in the London Plan and units in the Regulation 19 draft Local Plan repeats an unhelpful misalignment that exists between current policies, undoing the alignment sought in the Regulation 18 draft Local Plan.

The BNPP Study which supports the draft plan indicates that the amendments to draft Policy H3 between Regulation 18 and 19 stages would negatively impact on scheme viability. It could therefore risk reducing the total number of affordable homes that can be delivered over the plan period contrary to the objectives of the plan. Further, the Officer report to Newham’s Cabinet Meeting held on 4<sup>th</sup> June 2024 stated that the affordable housing policy changes made following the full Council motion in December 2023 may cause deliverability challenges. This is because of the impact it could have on the Plan’s viability. The Council is concerned that if it was to be submitted to an inspector for examination that it will be challenged and found to be unsound. We echo these concerns and request that the emerging wording of this policy is reverted to that in the Regulation 18 draft Local Plan albeit with the terminology updated to refer to “low cost rent” and “intermediate” tenures, again in alignment with the London Plan, clarification that the tenure split is based on habitable rooms, and removal of the reference to schemes not providing a policy compliant unit mix in terms of family units (draft Policy H4) not being eligible for the fast-track route. Appendix A includes a proposed revised wording of the policy in line with these comments.

In terms of housing mix (**draft Policy H4**), while it is acknowledged that the overall family housing (3+ bedroom) requirement increases by only one percentage point (39% to 40%), it must also be recognised that the current 39% target is rarely met as there are several important factors that can influence the deliverable unit mix as recognised in London Plan Policy H10. To compound this, the proposed requirement for a minimum of 5% 4+ bedroom affordable units on site allocations further challenges the deliverability of family housing, especially when coupled with a very restrictive cap of one-bedroom two person units (15%). The market demand and deliverability of the proposed family housing requirement needs to be reconsidered, including in the context of the impact of a very high resultant child yield, which can be a cause of operational concern for housing associations. TSP therefore considers that the requirements for 40% family housing (3+) should be deleted from the policy, or at most, stated to apply as targets to low cost rented homes only, with the opportunity for exceptions to apply where justified with evidence. Likewise, requirements for 4+ bedroom housing should be removed and the maximum allowance for one bedroom units should be removed.

The draft Local Plan includes a series of highly prescriptive proposed requirements relating to the design/provision of housing and associated amenity space. This is principally contained in **Draft Policy H11**. The HPA for Silvertown is supported by a Design Code which establishes design rules for the development of the site and future Reserved Matters Applications will need to demonstrate compliance with it. TSP has an outstanding general concern about the prescriptiveness of emerging policy acting as a barrier to a design-led approach which optimises density and maximises quality. TSP considers that these standards may be more appropriately directed to planning guidance rather than adopted policy.



#### **4. Development Management Policies**

There are several development management policies within the Regulation 19 pre-submission document which require major development applications to submit specific technical reports to the Council to better understand the proposed development. The nature of some of the required reports are very prescriptive and their inclusion could unnecessarily extend the determination period needed to determine applications and place a strain on the Council's resources. The detailed representations contained at **Appendix A** build on these comments.

#### **Summary**

We trust that these representations are of assistance in identifying where certain sections of the pre-submission (Regulation 19) draft Local Plan, which is generally supported by TSP, needs further review and amendments.

Should you have any queries or require any further information in respect of the above, please contact Heloise Whiteman or Alasdair Buckle of this office.

Yours faithfully

**DP9 Ltd**



## APPENDIX A: DETAILED REPRESENTATIONS

Policy	Representations, including proposed amendments
<b>BFN1: Spatial strategy</b>	<ul style="list-style-type: none"> <li>The draft policy is generally supported, and the hybrid planning application proposals have been developed in line with it. TSP agrees with the principle of development being directed to all of Newham's 17 neighbourhoods, especially the six neighbourhoods in the Royal Docks.</li> </ul>
<b>BNF2: Co-designed master planning</b>	<p>The draft policy is generally supported, and the hybrid planning application proposals have been developed in line with it. It does, however, seek additional requirements which are queried:</p> <ul style="list-style-type: none"> <li>Clarification is required in relation to the need for a Meanwhile Use Strategy. TSP will proactively seek to deliver meanwhile uses where possible, but does not see the need for a specific strategy to be submitted for approval by LBN. Rather than direct resources to assessing such strategies, LBN should consider how its own planning application determination processes can be focused to support the delivery of timely permissions for meanwhile uses.</li> <li>Clarification is required in relation to post-occupancy surveys. LBN should explain the envisaged scope of these surveys and should assess whether requiring such surveys would deliver a benefit that would outweigh the administrative burden on its development management officers, who would have to register submissions and presumably assess surveys. Any burden on occupiers also needs to be understood.</li> </ul>
<b>BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing</b>	<p>The draft policy is generally supported – development in Newham should maximise social value and make positive contributions to the health and wellbeing of the community.</p> <p>TSP has not submitted a SV-HIA as part of the current HPA and considers that one should not be required. This is because of a concern about whether the benefits of providing such a statement outweigh the impact reviewing it will have on LBN Development Management resourcing, with another submission document to consider, and the ability to determine planning applications in a timely manner aligned to statutory determination periods which is already routinely not achieved. LBN should be seeking to adopt a Local Plan which supports the Development Management team's ability to process planning applications for positive, sustainable development in a timely manner, rather than to burden the team with additional reports on top of the significant number that is already required.</p>
<b>BNF4: Developer contributions and infrastructure delivery</b>	<p>For clarity, the policy (or supporting text) should list which "Section 106 requirements" require adherence to avoid the need for viability testing so these costs can be appropriately factored into viability assessments. This is in line with Planning Practice Guidance which sets out that planning obligations should be clearly set out in plans and subject to examination. It is acknowledged that the Section 106 requirements are discussed elsewhere in the draft, however, a single list will help to avoid any ambiguity around when viability assessments are, and are not, required. It is important to note, however, that viability assessments will not require updates on a continuous basis as Section 106 Agreements are negotiated.</p> <p>In terms of point 4, in terms of submitting an infrastructure sufficiency statement, it is not clear what the benefit of such a report is when infrastructure sufficiency will already be tested in a range of technical reports, including EIAs for schemes of scale, and this relates back to a concern about whether the benefits of providing such a statement outweigh the impact reviewing it will have on LBN Development Management resourcing, with another submission document to consider, and the ability to determine planning applications in a timely manner aligned to statutory determination periods which is already routinely not achieved. LBN should be seeking to adopt a Local Plan which supports the Development Management team's ability to process planning applications for positive, sustainable development in a timely manner, rather than to burden the team with additional reports on top of the significant number that is already required. If LBN is to require infrastructure sufficiency statements, supporting guidance should be clear about the methodology to be used in assessing the need for all types of infrastructure.</p>



<b>D1: Design standards</b>	<p>The policy is generally supported especially that all developments should enhance the existing positive elements of local character and carefully consider opportunities to improve less successful urban forms, movement barriers and other local challenges.</p> <p>However, TSP disagree that all major developments should achieve a Secured by Design accreditation. If applicants have organised meetings with the Metropolitan Police for their feedback, evidence of this should suffice. A requirement to submit details of Secured by Design measures, but not achieve accreditation, would be supported.</p>
<b>D2: Public realm net gain</b>	<p>The policy is generally supported and it is noted that the Silvertown hybrid planning application commits to a significant minimum quantum of public realm on site, resulting in an exponential increase in public realm, and supports off-site public realm enhancements in relation to the Royal Docks Corridor scheme.</p>
<b>D3: Design-led site capacity optimisation</b>	<p>The draft policy is supported. It is considered that Silvertown optimises density and provides a range of dwelling types.</p>
<b>D4: Tall buildings</b>	<p>The proposed inclusion of Silvertown within a tall building zone is supported, and the hybrid planning application includes some buildings which would be considered tall buildings (most of which were approved as tall buildings in the Phase 1 RMA). As aforementioned, the maximum height should be 55.9m AOD as this is the approved maximum height of the Millennium Mills building.</p> <p>The proposed expectation for the shoulder height of tall buildings being at a 1:1 relative to the width of the street (Part 4) is highly prescriptive and would not be conducive to high quality public realm, streetscape and building design in dense urban environments. This should be deleted in order to allow applicants to agree site-specific approaches with LBN Design Officers and the DRP.</p>
<b>D5: Shopfronts and advertising</b>	<p>The wording used for this policy is supported in principle. However, security measures which are summarised at Part 1c are essential to protect shopfronts and it is unclear what the policy would recommend instead of shutters. At point D5.1 it becomes clearer that security measures should be internally placed and that if shutters are to be used they should be perforated. This wording or wording to this effect should be integrated into the policy wording to make it clearer re what the Council wants for new development.</p>
<b>D6: Neighbourliness</b>	<p>The wording of this policy is supported. It is agreed that all development should create positive social and environmental impacts and consider potential impacts on amenity. However, the specific requirement to provide a plant maintenance plan where mechanical solutions are proposed is unnecessary. Where plant is proposed within a development, noise impact assessments are submitted to demonstrate that it will align with LPA's noise standards. However, requiring the submission of this report to demonstrate that applicants will maintain plant to reduce noise levels is unnecessary.</p>
<b>D9: Designated and non-designated heritage assets, ancient monuments and historic parks and gardens</b>	<p>In principle, the policy aspirations to ensure that designated heritage assets will be conserved and enhanced is acceptable. The detail provided in Part 1 which states that development should secure viable, sustainable and appropriate futures for all heritage assets within the scope of the site, particularly where they are on the Historic England's Heritage at Risk Register is also supportable and reflects the collaborative approach taken in relation to the Grade II listed Silo D.</p>
<b>HS1: Newham's Town Centres Network</b>	<p>Part 1: TSP support the principle of a 15-minute neighbourhood, which is particularly applicable to Silvertown and the Royal Docks Opportunity Area. To achieve this vision and create communities based on 15-minute neighbourhood principles, a dynamic and flexible policy approach should be adopted, to reshape the traditional high street hierarchy. With regards to Part 1 (e), as set out above, TSP consider a Local Centre at Silvertown should be considered as a standalone Local Centre with its own population and key functions, rather than an "extension" of Royal Wharf Local Centre. Notwithstanding the above, the Site should be complementary to the offer at Royal Wharf.</p>



	<p>Part 3: The requirements for Impact Assessments (under Part 3) for a Town/Local Centre is at odds with the national Town Centre first approach and would deter a full range of businesses coming forward, particularly small businesses. Town Centre uses should remain flexible in accordance with the Use Class Order amendments made in 2020.</p> <p>Similarly, the list of criteria under part 3, particularly those which set specific unit numbers and floorspace requirements, further restricts the design-led approach. This approach is overly prescriptive and does not enable flexibility, or for units to be led by design or market need. The quantum, size and location of Local Centre units should be assessed on a case-by-case basis through the submission of planning applications. The proposals for Silvertown have been developed through a design-led approach and the focus of the centre recognises the importance of the proposed Silvertown Avenue as a key connector to Custom House and the placemaking importance of Millennium Mills. The current boundary does not reflect this opportunity. It would be an unsuccessful placemaking and 15-minute outcome for the centre to be located only at the North Woolwich Road frontage of the Site.</p> <p>The rationale behind the requirements for an evidenced Marketing Strategy and Meanwhile Use Strategy (Part 3(c)) within the new centres is unclear and TSP are concerned that this could place unnecessary burdens on certain non-residential development coming forwards in these centres and thus restrict the types of development that might be located on-site. These requirements should be removed from the emerging policy.</p> <p>Table 3 sets out Newham's Town Centres Network which establishes a locations scale, potential scale and a location's key functions. Silvertown has been noted as a local centre which meets the local catchment need for retail, leisure services and community uses and as a location which supports an incidental visitor economy. TSP supports the wording set out within this part of the policy and the role that Silvertown has been noted to play as a local centre.</p>
<b>HS2: Managing new and existing Town and Local Centres</b>	<p>Part 1: TSP support Part 1 of the policy.</p> <p>Part 2 of the policy places a prescriptive requirement in terms of 80% of units being in Class E use in all town and local centres, and it is not considered that this would always be appropriate such as in the case of the Local Centre at Silvertown. The requirement should be deleted and the proportion of Class E use should be negotiated on a case-by-case basis having regard to wider policy requirements, and the outcome of Impact Assessments.</p> <p>Part 6: The objective to encourage the provision of small units within the Town/Local Centre is supported, however, TSP opposes the prescriptive requirements for developments in Local Centres proposing 1,000sqm GIA or more of Class E development to deliver 10% of Class E floorspace small units marketed at discounted or turnover-based rents. This is likely to impact on the vitality of schemes, create vacancies and would give a commercial advantage to some occupiers. It is likely to deter Town and Local Centre development/redevelopment from coming forwards. Furthermore, the requirement for a "Vacancy Prevention Strategy" is not considered necessary. Rather than require more submission documents requiring assessment in applications, the focus should be to support Development Management to be able to determine applications quickly, reducing the impact of planning on the vacancy rate.</p> <p>Part 7: TSP does not consider Marketing Strategies for Class E units to be necessary. Rather than require more submission documents requiring assessment in applications, the focus should be to support Development Management to be able to determine applications quickly, reducing the impact of planning on the vacancy rate.</p> <p>Part 9: TSP supports the delivery of high-quality public realm in the vicinity of Local Centres.</p>



<b>HS3: Edge-of-Centre and Out-of-Centre retail, restaurants, cafes and services</b>	<p>Silvertown will play a vital role in delivering LB Newham's 15-minute neighbourhood vision and address the deficit in amenities to existing communities in the Royal Docks area and ensure future residents of Silvertown Quays are adequately catered for. As highlighted above, an alternative approach to the traditional Town Centre hierarchy should be considered to help achieve this aim and prevent limitations to achieving this vision.</p> <p><b>Part 2:</b> TSP welcome the inclusion of an exemption from a sequential test for listed and locally listed buildings with a non-residential use, where the proposals protect the asset's significance and help secure a viable use. However, the proposed inclusion of a 300sqm threshold is not agreed with and should be deleted. Silvertown is an example of a site where it is appropriate to have some uses outside of the defined town centre (e.g. the dockside) and 300sqm is restrictive in this regard.</p> <p><b>Part 3:</b> TSP have concerns in relation to the requirement for a retail and/or leisure impact assessment for development of 300sqm GIA or more of new or expanded floorspace. This is significantly below the nationally set threshold, and along with the requirement for a sequential test (<b>Part 2</b>), does not recognise the nuances of creating a successful and sustainable 15-minute neighbourhood.</p> <p><b>Part 4:</b> TSP understand the need for planning obligations and planning conditions to assist in ensuring development is appropriate for its location, but consider the requirements at part 4 of the policy should be considered on a case by case basis, rather than directed by policy. Part 4a should be expanded in terms of the potential for sites such as Silvertown to deliver night-time economy uses in a planned way that helps to reduce the decline in evening economy venues. Part 4b sets out that where the sequential test threshold is met, a planning condition or obligation should be imposed to "require the submission and approval of an adequately resourced Vacancy Prevention Strategy and/or Marketing Strategy." Imposing this requirement through policy does not meet the planning condition or planning obligations tests, and it is not appropriate to use conditions/obligations to impose broad unnecessary controls.</p>
<b>HS4: Markets and events/pop-up spaces</b>	<p>The main policy focus is on protecting, encouraging and securing temporary events / pop ups and permanent markets in Local Centres which TSP supports. Further clarification is required regarding Part 2 (d), as while public engagement / co-design of temporary activities is supportable in principle, the process should be streamlined in order to not create a significant burden which could reduce the attractiveness of delivering such uses.</p> <p>TSP is concerned about the wording of 3.b which states that LBN will support permanent new markets or short-lease flexible use or events space within local centres if evidence is supplied to demonstrate market demand or through temporary use testing of the concept over a period of at least 12 months. TSP requests that wording of this is deleted so that such a requirement is not necessary for short-lease flexible use or events space.</p>
<b>HS5: Visitor Evening and Night Time Economy</b>	<p>Part 1, Table 4: TSP support the principle of an evening and night-time economy policy. However, it is noted that Table 4 only directs evening and night-time economy towards certain town centres. To enable the vibrancy of Town and Local Centres to respond to ever-changing retail and leisure markets, the policy should relate to all Town and Local Centres across the network. Silvertown Local Centre is identified as serving two key functions: for local residents and servicing visitors to the Excel centre. Supporting visitor evening and night-time economy at Silvertown is an important component to justly accommodate these functions and this should be recognised in policy.</p> <p>Part 3: The restriction of 'no more than a quarter of all units' in Local Centres to be for visitor and night-time uses would confine the range of uses in centres, particularly as Table 5 defines a number of uses under evening and night-time economy uses (inter alia restaurants, cafes, pubs and bars, food markets, gyms and indoor leisure, museums, art galleries, cinema and theatres). Therefore, this requirement should be deleted.</p> <p>Table 5: With regards to Table 5, this directs different uses towards specific areas (e.g. inside or outside of primary shopping areas), and therefore further limits the flexibility between the uses. In directing restaurants and cafes towards primary shopping areas for example, this unduly prevents these uses to also be located outside these areas, which would be contrary to the aim of the 15-minute neighbourhood principles. Therefore, this requirement should be deleted.</p>



<b>HS6: Health and wellbeing on the High Street</b>	The principle of supporting health and wellbeing through land use control is supported. However, with reference to hot food takeaways there is some concern regarding a 'one size fits all approach' in relation to the location and concentration of such uses. While it is expected that the proposals for Silvertown would generally comply with this draft policy, a small hot food takeaway allowance (500sqm) is sought, and it is considered to contribute to the placemaking strategy for the site. Hot food takeaways are not automatically unhealthy, and Silvertown may attract hot food takeaway businesses offering healthy food in line with the Healthy Catering Commitment (or similar accreditation). The policy wording should be updated to support a small provision of hot food takeaways on appropriate strategic sites.
<b>HS7: Delivery-led business</b>	The HPA proposals for Silvertown include an allowance for commercial kitchen and delivery centre use (referred to as 'dark kitchens' in the policy text) and/or storage and distribution micro-fulfilment-type uses towards the east in the area referred to as Silverworks. Parts 1 and 2 of the policy should include reference to such uses being acceptable in "suitable locations within strategic sites", given there is agreement that Silvertown could host industrial uses (as referred to in the draft site allocation).
<b>HS8: Visitor accommodation</b>	The HPA proposals for Silvertown include an allowance for a hotel on the site, which is consistent with the support for main town centre uses in the draft site allocation. The locational requirements should account for the appropriateness of hotels within proximity of City Airport as well as the ExCeL centre. Visitor accommodation can provide an important function to the operation of City Airport.
<b>SI2: New and re-provided community facilities and health facilities</b>	The principle of this policy is largely supported. Especially Part 1 of the policy which confirms that the delivery of new community facilities on identified site allocations should be based on need. It is considered that the requirement for a "needs based assessment" should only relate to community facility uses for which it is possible to establish a 'need', such as school and healthcare places. Many community facilities do not attract a need in a quantifiable sense.
<b>S14: Education and childcare facilities</b>	The supporting table within this policy which sets out that TSP will be providing land for a Primary School is supported. While the HPA proposals include early years child care provision, it is considered that there should be flexibility in terms of whether this is provided as part of or separately to the Primary School, and the wording of the policy should not require that the uses are combined.
<b>J1: Employment and growth</b>	<p>Part 1: TSP supports that developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough's office and industrial needs.</p> <p>Part 2: TSP support the inclusion of wording in Part 2 which confirms that mixed use site allocations are an important contributor to employment generation.</p> <p>Part 3: TSP has concerns in relation to the requirement for all employment floorspace proposals to submit an Economic Strategy, including those in areas in locations identified as suitable for employment floorspace. It is not clear whether the benefits of providing such a Strategy outweigh the impact reviewing it will have on LBN Development Management resourcing, with another submission document to consider, and the ability to determine planning applications in a timely manner aligned to statutory determination periods which is already routinely not achieved. LBN should be seeking to adopt a Local Plan which supports the Development Management team's ability to process planning applications for positive, sustainable development in a timely manner, rather than to burden the team with additional reports on top of the significant number that is already required. It is agreed that it may be appropriate for planning conditions to require the submission of Economic Strategies in certain circumstances. The draft wording should be updated accordingly.</p>
<b>J2: New employment floorspace</b>	<p>Part 4: TSP welcome the recognition that employment floorspace is an important factor in delivering the 15-minute neighbourhood.</p> <p>It is noted that in the HPA TSP has complied with the requirement for sequential testing of office developments as set out at Part 4.</p>
<b>J3: Protecting employment floorspace</b>	Silvertown includes existing industrial uses at Charles Street that are not considered to be relocatable on site. The stated requirement to support relocation of existing businesses should be refined to only apply in circumstances where the existing business is a small or medium sized business, where their relocation away from the site is as a direct consequence of the development proposal rather than their lease expiring, and where they are actively seeking relocation. Specifically in relation to Part 4, the proposed





	requirements should be clarified to not relate to site allocations, as the requirement to obtain marketing evidence and carry out 15-minute mapping could delay the delivery of strategically important regeneration.
<b>J4: Delivering Community Wealth Building and Inclusive Growth</b>	<p><b>Part 1:</b> the viability and deliverability impact of the proposed employment obligations, including contributions, requires a thorough assessment to ensure the approach will not negatively impact on the delivery of affordable housing over the plan period.</p> <p><b>Part 4:</b> there needs to be consideration of viability impact of potential Affordable Workspace requirements. This is especially important for strategic sites allocated for mixed-use development in regeneration areas such as Silvertown. The appropriateness of the principle seeking affordable workspace in such locations, where workspace would be inherently affordable in a London context and its success would foster community wealth building, is questioned and should be considered.</p>
<b>H1: Meeting housing needs</b>	The wording of this policy should be expanded to support increased housing delivery in the borough particularly with greater need for housing set out by the Government in the 2024 National Planning Policy Framework (NPPF) consultation. To meet the housing targets and assessed demand, the Local Plan policies should be less restrictive, flexibility should be introduced to these policies to support optimising housing delivery to meet housing targets on highly accessible sites. However, TSP does support a focus on housing delivery on site allocations and that site capacities should be optimised through a design-led approach.
<b>H3: Affordable housing</b>	<p>TSP has reviewed the newly revised wording for Policy H3. The proposed increase in the proportion of social rent homes raises significant concerns from a viability perspective. To require residential development on individual sites with the capacity to deliver ten dwellinghouses or more to provide 50% of the total residential units as social rent housing and 10% of the total residential units as affordable home ownership housing is well in excess of the London Plan requirement. The move from 'low cost rent' to social rent only is also not supported. This wording should revert to alignment with the Regulation 18 draft, which was aligned to the London Plan. Likewise, affordable housing should be measured by habitable room, for alignment with the London Plan. Finally, from the wording of the policy it is hard to decipher the tenure split requirements and it is considered that it is better to set out a tenure split within an overall affordable housing percentage, which is the commonplace approach).</p> <p>Accounting for our representations in relation to draft Policy H3, we propose the following revised wording, which is generally aligned to the Regulation 18 draft version, albeit with some amendments to further improve alignment to the London Plan:</p> <ol style="list-style-type: none"> <li>1. <i>Newham's strategic target is for 50 per cent of all new homes delivered across the Plan period to be affordable housing. This will be achieved through:</i> <ol style="list-style-type: none"> <li>a. <i>the significant areas of Council and Greater London Authority land ownership within the borough where affordable housing will be prioritised; and</i></li> <li>b. <i>delivering affordable housing through the threshold approach set out in the London Plan (2021); and</i></li> <li>c. <i>delivering Newham's estate regeneration and affordable homes programmes; and</i></li> <li>d. <i>supporting Registered Providers to deliver affordable homes.</i></li> </ol> </li> <li>2. <i>New residential developments on individual sites with the capacity for ten units or more should provide:</i> <ol style="list-style-type: none"> <li>a. <i>the percentage of affordable housing required through the threshold approach as set out within Policy H5 of the London Plan (2021); and</i></li> <li>b. <i>an affordable housing tenure mix by habitable room of 65 per cent low cost rent housing and 35 per cent intermediate homes.</i></li> </ol> <p><i>Developments that do not meet these requirements cannot follow the fast track route.</i></p> </li> <li>3. <i>New residential developments with the capacity for ten units or more should provide affordable housing on site. Where the Council considers that on site provision is inappropriate or undeliverable with regard to site conditions, the scale of the site or local context (including tenure mix), Newham may accept off site provision of affordable housing or exceptionally a</i></li> </ol>



	<p>payment in lieu of affordable housing provided that it would result in the ability to secure a higher level of affordable housing provision than the 50 per cent strategic target sought by part 1 above.</p> <p>4. <i>New residential developments which seek to provide additional housing units either through an amendment to a current permission or an application to extend an existing development on the same or an adjoining site (where the extension is reliant on the existing permission or development to function or to meet policy requirements or standards required elsewhere in the plan), will be assessed against the requirements of Policy H3 based on the combined number of units of both the existing site or permission and the proposed new units.</i></p>
<b>H4: Housing mix</b>	<p>The proposed increase in family (3+ bedroom) housing from 39% under the existing Local Plan to 40% may appear to be minor but when coupled with the new requirement for a minimum of 5% 4-bedroom affordable units and a very restrictive cap on one bedroom units raises several concerns, as follows:</p> <p>For the market housing, there is a significant concern about the viability of a high concentration of family homes and a limited concentration of 1-bedroom units. It is acknowledged that developments seldom achieve the current targets for this reason and therefore the benefit of seeking a further concentrated supply of family units is questioned.</p> <p>In addition to testing the viability of the unit mix sought, LBN should also satisfy itself that the unit mix is deliverable in the context of the resultant significant child yield and the knock-on implications for operators of affordable housing and demand in terms of playspace.</p> <p>TSP considers that the requirements for 40% family housing (3+) should be deleted from the policy, or at most, stated to apply as targets to social rented homes only, with the opportunity for exceptions to apply where justified with evidence. Likewise, requirements for 4+ bedroom housing should be removed, there should be no maximum allowance of one bedroom two person units. The 5% studio allowance should be retained.</p> <p>Overall, we propose that the wording of Policy H4 is amended as follows:</p> <ol style="list-style-type: none"> <li><i>All new residential developments should deliver a mix and balance of residential types and sizes. The appropriate mix of residential sizes, types and tenures will be determined through:</i> <ol style="list-style-type: none"> <li><i>the need to secure mixed and inclusive communities; and</i></li> <li><i>evidence of housing need as set out in Newham's latest Strategic Housing Market Assessment; and</i></li> <li><i>development viability; and</i></li> <li><i>the existing and pipeline mix of residential units in the area; and</i></li> <li><i>the individual circumstances of the site in terms of site conditions, local context and site features, particularly on sites delivering below ten dwellinghouses (C3).</i></li> </ol> </li> <li><i>New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver <del>40</del> 39 per cent of the number of new <b>low cost rent</b> residential units as family dwellinghouses (C3) with three or more bedrooms. <del>Developments that do not meet these requirements on site and the delivery of the required level of affordable housing under Local Plan Policy H3.1 will not be supported unless and accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</del></i></li> <li><del><i>New residential developments on site allocations should provide a minimum of five per cent of the proposed residential units as four or more bed affordable family dwellinghouses (C3).</i></del></li> <li><del><i>New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 15 per cent of the number of new residential units as one bedroom, two person dwellinghouses (C3).</i></del></li> </ol>



	<p>5. <i>New residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver no more than 5 per cent of the number of new residential units as studio or one-bedroom, one person dwellinghouses (C3).</i></p> <p>6. <i>In exceptional circumstances, a portfolio approach to the delivery of affordable housing and/or family dwellinghouses (C3) may be accepted, subject to developments not resulting in an unacceptable impact on the mix and balance of residential types and sizes in an area. Developments within a portfolio delivering additional affordable housing and/or family dwellinghouses (C3) should be located in Newham, and completed and ready for occupation prior to the developments within the portfolio that deliver affordable housing and/or family dwellinghouses (C3) below the policy target set out in H3.1 and H4.2.</i></p>
<b>H5: Build to Rent housing</b>	It is considered that this policy is not required as its requirements largely replicate those of Policy H11 of the London Plan, and therefore it should be deleted.
<b>H11: Housing design quality</b>	<p>The proposed Housing Design Quality standards are generally supported, however, there are proposed requirements which are highly prescriptive and have the potential to restrict the design-led approach to achieving high-quality design. The level of detail far exceeds that typically found in a policy and is better suited to a supplementary planning guidance document, much of which is already contained in the GLA's Housing Design Standards. The following detailed representations are made:</p> <ul style="list-style-type: none"> <li>• Part 1(a) – clarity is required on what qualifies as irregular geometry that limits reconfiguration of internal layouts;</li> <li>• Part 2(b) – the requirement to reduce the number of outdoor amenity space of the bedroom is very specific. It is queried if this would be more appropriate to express in guidance.</li> <li>• Part 2(c) – there may be situations where street facing ground floor bedrooms are acceptable depending on the nature of the street and the extent of proposed setbacks.</li> <li>• Part 5 – while the proposals for Silvertown include shared amenity spaces, a prescriptive area-based requirement raises concerns and could have implications for the achievability of optimised high density development. A blanket approach is not considered to be correct given other factors such as the proximity to open spaces have a bearing on the amount of communal space that is appropriate.</li> </ul>
<b>GWS1: Green spaces</b>	The policy is generally supported and in alignment with the proposals for Silvertown. The reference in Part 5 to the transfer of open spaces to the Council is not supported as it is not considered that this will be necessary with the right controls in place. At Silvertown, open spaces will benefit strongly from being managed as part of the wider Estate. This aspect of the policy should be deleted
<b>GWS2: Water spaces</b>	As a key stakeholder in the Royal Docks TSP fully recognise the special characteristics of Royal Victoria Dock and Pontoon Dock and the important contribution of the water to the strength of the wider Royal Docks place making and visitor destination offer. Accordingly, TSP fully support the GLA's representations proposing a bespoke policy to promote the unique role of Royal Victoria Dock and Pontoon Dock and the opportunity for water-related activation and uses, to provide a much clearer policy framework within which proposals can come forwards and be assessed.
<b>GWS3: Biodiversity, urban greening, and access to nature</b>	This policy aligns with the legislative framework requiring biodiversity net gain and therefore it is generally supported by TSP. TSP also agrees with submitting ecological assessments to support major development.
<b>GWS4: Trees and hedgerows</b>	This policy confirms that development should protect and deliver a network of improved tree stock and canopy cover to increase a healthy and balanced tree population. TSP supports the principles of this policy and as part of the HPA, soft landscaping has been proposed to green the Site appropriately. In particular, the acceptance that tree removal can occur where adequately replaced (part 2) is strongly supported and reflected in the HPA proposals.



<b>GWS5: Play and informal recreation for all ages</b>	In principle, TSP agrees with the core objectives of the policy. However, clarity is sought in respect of Part 2a as to what the plan means when it says 'co-production' with local adults, children and young people, parents and carers on the design of new provision early on in the development of an application. Major applications run consultation with the local population and various stakeholders, pre submission and during the application on the design of the scheme. TSP questions the need for the potential additional workshops for this to take place.
<b>CE1: Environmental design and delivery</b>	TSP agrees that development should address the climate emergency through design, construction and lifespan of the buildings it proposes to erect.
<b>CE2: Zero Carbon development</b>	<p>The focus on net zero carbon development is supported, however, some detailed comments are provided. The space heating targets in Criteria 1 and 2 are onerous for certain types of building and a full assessment of the anticipated achievability of the targets should be provided.</p> <p>The inclusion of an absolute target for renewable energy generation as set out in Criterion 5 is not supported. The approach should be aligned to that in the London Plan in relation to maximising on site generation but supporting offsetting.</p>
<b>CE3: Embodied Carbon and the circular economy</b>	It is noted that the intent of this policy aligns with the London Plan and supporting guidance. However, Criterion 6 sets a target which does not align with the GLA's minimum benchmark, and therefore there should be justification of why higher targets are deemed to be achievable in Newham.
<b>CE4: Overheating</b>	The benefit of the inclusion of Criterion 3 is queried, given compliance with Part O is required to be demonstrated at Building Control stage. A qualitative assessment of overheating measures may be a more useful exercise.
<b>CE6: Air quality</b>	<p>Part 2 requires development along major roads or in other locations that experience poor quality that cannot be mitigated to improve the dispersal of pollutants. TSP queries the definition of major roads and examples of improving the dispersal of pollutants.</p> <p>Part 6 requires all masterplan development to consider how local air quality can be improved as part of an air quality approach. This has occurred in relation to Silvertown.</p>
<b>CE7: Managing flood risk</b>	The practicality of this policy is noted and is supported as it looks to safeguard residential uses so that they are positioned within sensible locations within the borough and above / on 1 <sup>st</sup> floor of developments.
<b>CE8: Sustainable drainage</b>	<p>In principle TSP agrees that development should be required to reduce the risk of surface water flooding, through separating foul and surface water flows and incorporating Sustainable Urban Drainage Systems that reduce surface water run-off.</p> <p>However, 2b sets out a specific approach and it states that N2 Royal Victoria site allocations will need to implement blue-green infrastructure runoff reduction interventions or Sustainable Urban Drainage systems on 50 per cent or more of their site area. TSP questions where this justification comes from due to the specific nature and cost implications associated with providing this and notes that this is not part of the HPA proposals nor has it been requested by technical consultees. It is proposed that this wording is deleted</p>
<b>T1: Strategic transport</b>	Development will be required to protect the transport network which TSP supports. There is also support for proposals for new strategic transport schemes which unlock growth and minimise social, economic and environmental impacts.
<b>T2: Local transport</b>	The policy wording is supported. However, as part of 2c, it states that major developments should provide an appropriate amount of car club parking bays. Further clarity on this point would be appreciated to understand what is an appropriate amount.



	In terms of the Legible London initiative, further information around how much funding would be required for developments is essential. Further information is required re how developments would integrate 'new transportation technology' which has been defined as drones, electric cars etc.
<b>T3: Transport behaviour change</b>	Car free development and development that provides sustainable transport storage is supported. However, the Transport Assessment thresholds set out in Table 15 seem to be low for certain development, especially for residential, medical services and hotels. Their levels should be revisited.
<b>T4: Servicing a development</b>	The wording of this policy is supported. Encouraging more environmentally friendly service vehicles is a must however, it is important to note that not all servicing will be achieved through electric vehicles.
<b>T5: Airport</b>	TSP agrees with Part 6 of the policy which states that development within close proximity of the airport needs to consider a range of factors including the agent of change principle, height and noise limitations. This has occurred in relation to Silvertown.
<b>W3: Waste management in developments</b>	The waste management policy is supported as it requires an appropriate level of information to be submitted alongside applications.
<b>N2.SA1 Silvertown Quays</b>	<p>The main representations address TSP's key strategic comments on the proposed site allocation. These result in the following proposed track changes to the development principles, design principles, infrastructure requirements and phasing and implementation text:</p> <p><u><i>Development principles</i></u></p> <p><i>Residential, employment uses, main town centre uses and social infrastructure, including community facilities, sports and recreation facilities, education, and open space.</i></p> <p><i>The employment uses should be consistent with Local Plan Policy J1 <del>and prioritise industrial floorspace in the form of workspace for cultural and creative production maker space and warehousing and distribution uses.</del></i></p> <p><i>The type and quantity of main town centre uses should extend and complement existing provision at Silvertown Local Centre, and should remain consistent with a local centre designation and Local Plan Policy HS1. The site should also provide a small to medium sized food store to meet local need, subject to passing the Impact Assessment.</i></p> <p><i>Development should address the need for community facilities in the area by delivering new community facilities <del>in Silvertown Local Centre</del>, unless it can be demonstrated that the needs of the community have already been met. Development should consider of all types of community facility, as set out in the Community Facilities Needs Assessment (2022) evidence base. Any provision of community facilities should meet the requirements of Local Plan Policies SI2 and SI3.</i></p> <p><i>Sports and recreation facilities <b>including</b> in the form of water-related and water-dependent activities will be supported. These uses may be supported by small-scale ancillary uses such as food and drink uses around the water.</i></p> <p><i>Development proposals should ensure that flood risk is minimised, mitigated and informed by a site specific Flood Risk Assessment, as per Local Plan Policy CE7 and informed by the Strategic Flood Risk Assessment Level 2 Site Assessment (2023).</i></p> <p><u><i>Design principles</i></u></p> <p><i>The site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2.</i></p>



	<p>Building heights should <b>generally</b> range between 21 – 32m (ca. 7-10 storeys) with taller buildings up to <del>50m</del> <b>55.9m AOD</b> (<del>ca. 16 storeys</del>). Massing should step down towards the south west of the site to sensitively integrate with the low rise context on Mill Road.</p> <p>The location of frontages and public realm as part of the extension to Silvertown Local Centre should help create a continuous centre by connecting to the existing designated Primary Shopping Area at Admiralty Avenue, via Pontoon Dock DLR Station and surrounding public realm on North Woolwich Road to the River Thames. Main town centre uses should be located towards <b>the west of the Site between Millennium Mills and North Woolwich Road</b> <del>with the industrial workspace for cultural and creative production maker space located towards Millennium Mills.</del></p> <p>Development should conserve and enhance the locally listed Millennium Mills and Grade II Silo D, which is on the Heritage at Risk Register, and their settings, in accordance with Local Plan Policy D9.</p> <p>The layout of the site should increase access to the water, create high quality, green public realm along the dock edge and maintain the open character of the water and protect the Site of Importance for Nature Conservation. Water-related and water-dependent activities should activate the water at Pontoon Dock.</p> <p>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. Routes through, and to and from, the site should improve access and connectivity across the dock, along the dock edge, to the DLR station and to Royal Wharf. Separate HGVs and pedestrian access should be designed to avoid conflicts between different uses, particularly where servicing the employment uses. Greenspace provision should enhance connectivity north to south and connect the site to Thames Barrier Park.</p> <p>Design measures should minimise exposure to poor air quality on North Woolwich Road and Connaught Bridge.</p> <p>The layout of the site should take account of the noise contours across the site, the Public Safety Zone and the Operational Limitation Surfaces from London City Airport and design measures should minimise exposure from the airport. The design and layout of the site should take into account the existing on-site sewer.</p> <p>The design and layout of the site should take account of risk of flooding from all sources and meet the requirements of Local Plan Policy CE7. Sustainable drainage should be considered from the outset and meet the requirements of Local Plan Policy CE8. Development should deliver the relevant site-specific integrated water management interventions outlined in section 1.3 of the Royal Docks and Beckton Integrated Water Management Strategy.</p> <p><u>Infrastructure requirements</u></p> <p>Development should address open space deficiency by providing <del>a consolidated local park</del> <b>publicly accessible open spaces</b> with a minimum <b>combined</b> area of 2 hectares to service nearby residential neighbourhoods. <del>The open space provision should prioritise community growing opportunities.</del></p> <p><del>In addition to</del> <b>As part of</b> the open space provision, development should provide publicly accessible play space <del>in the form of a Locally Equipped Area for Play as well as play space in the form of a Local Area for Play,</del> which should <del>be</del> <b>include</b> playable public realm. Play space should meet the requirements of Local Plan Policy GW5.</p> <p>Development should provide a new bridge connection across the dock to Custom House.</p> <p><del>Development should deliver an automated vacuum waste collection system to service all Local Authority Collected Waste generated by the development, in accordance with the requirements of Local Plan Policy W3.8.</del></p> <p>Development should provide <b>land for the delivery of</b> a primary school with early years childcare provision in accordance with Local Plan Policy SI4.</p>
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	<p><i>Development should contribute to active and public transport upgrades, including upgrades at Pontoon Dock Station, including upgrading escalators to improve access.</i></p> <p><u><i>Phasing and implementation</i></u></p> <p><i>Phasing of the site should take account of the likely requirement for water supply and wastewater infrastructure upgrades, which will need to reflect the cumulative impact of significant quantities of development in this location. This requires early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. Impact from the existing on-site sewer on design and layout should be taken into account at the preapplication stage through early engagement with Thames Water.</i></p> <p><i>Short to long term.</i></p> <p>In addition, the following detailed amendments are requested in relation to the factual tables (p.376):</p> <ul style="list-style-type: none"><li>• Site area – the site area should be amended to align with the area of the red line boundary for the current hybrid planning application, which is 28.8ha.</li><li>• Public transport accessibility level – per the Transport Assessment submitted with the hybrid planning application, the future PTAL for the site is expected to be 3-4 and therefore we would advocate the inclusion of “(projected increase to PTAL 3-4)” for context.</li></ul>
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