

Sara Chiong

From: Ellie Cannon <[REDACTED]>
Sent: 19 September 2024 16:29
To: Local Plan
Cc: [REDACTED]
Subject: Representations to Reg 19 Local Plan - Holiday Inn Express, Canning Town
Attachments: Reg 19 Representations - Holiday Inn Express Canning Town FINAL.pdf; Canning Town HIX - LBN Site Location Plan.pdf; 19.09.24 - Completed Response Form.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Planning Policy Team,

On behalf of our client, Redefine Hotels Portfolio IV Ltd, please find enclosed representations in response to the Council's consultation on the Draft Submission Local Plan (Regulation 19). This submission is primarily concerned with the Holiday Inn Express, 1 Silvertown Way, Newham, as outlined in red on the enclosed Site Location Plan, for which our client holds the freehold interest.

To support this submission, please find enclosed the following documents:

- Letter of Representations, prepared by Savills on behalf of Redefine Hotels Portfolio IV Ltd;
- Site Location Plan; and
- Completed Response Form.

We trust the attached provides everything required for consideration at this stage. However, please do not hesitate to contact me if you require any further details. We would be grateful if you could please confirm safe receipt by return?

We look forward to continuing to engage on the preparation of the emerging Newham Local Plan.

Kind regards
Ellie


Ellie Cannon MRTPI (She/Her)
Senior Planner
Planning

Savills, 33 Margaret Street, London, W1G 0JD

Tel: [REDACTED]
Email: [REDACTED]
Website: [savills.co.uk](https://www.savills.co.uk)



Response Form for Regulation 19 Consultation.

	<p>Local Plan Publication Stage Response Form</p>	<p>Ref:</p> <p>(For official use only)</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.

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

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" value="C/O Agent"/>	<input type="text" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Eleanor"/>
Last Name	<input type="text"/>	<input type="text" value="Cannon"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation (where relevant)	<input type="text" value="Redefine Hotels Portfolio IV Ltd"/>	<input type="text" value="Savills"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text" value="REDACTED"/>

Part B – Please use a separate sheet for each representation

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	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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.

We think that the emerging local plan can be made sound through the amendments suggested in our submitted letter.

(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.

See Submitted Letter for Comments

(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, 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:

Our client has a freehold interest in a significant site in Canning Town District Centre that requires collaboration with other landowners that may also be attending the hearing.

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 6th September 2024

19 September 2024



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

By email: localplan@newham.gov.uk

Neil Rowley
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Dear Sir or Madam,

NEWHAM LOCAL PLAN REVIEW: DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) FOR CONSULTATION (SEPTEMBER 2024)

REPRESENTATION ON BEHALF OF REDEFINE HOTELS PORTFOLIO IV LTD

HOLIDAY INN EXPRESS, 1 SILVERTOWN WAY, NEWHAM, E16 1EA

We write on behalf of our client, Redefine Hotels Portfolio IV Ltd, in response to the Council's consultation on the Draft Submission Local Plan (Regulation 19). This letter is primarily concerned with the Holiday Inn Express, 1 Silvertown Way, Newham (hereafter 'the Site'), as outlined in red on the enclosed Site Location Plan, for which our client holds the freehold interest.

This Site falls within the western portion of the emerging site allocation N5.SA3 'Canning Town Holiday Inn'. We provide detailed commentary on the key relevant policies, with proposed amendments to the policy wording provided in the table on pages 9-10.

The Site and Surroundings

The Site is located along the A1011 at Canning Town, Newham and comprises a 5-storey Holiday Inn Express Hotel with a car park to the rear and additional disabled parking to the front.

The Site benefits from excellent public transport accessibility, with the majority of the Site having a Public Transport Accessibility Level ("PTAL") of 6a and a portion to the south having a PTAL of 4. The PTAL is forecast to improve to a PTAL of part 6a, part 5 by 2031. George Street bus stop is located on the A1011 directly outside the site, and Canning Town underground station approx. 300m north. The Site is approx. 170m to the west of an area of public open space 'Keir Hardie Recreation Ground.'

The Site is not within a conservation area and does not include any statutorily or locally listed buildings.

The Site is situated within Flood Zone 3 but benefits from local flood defences.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

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The Site is immediately adjacent to business and industrial premises to the east; a car wash to the south and new-build high-rise residential blocks to the north and west, which each contain commercial uses at the ground floor, including retail and restaurants. The immediate area is undergoing significant redevelopment and identified in the Draft Local Plan within the designated Canning Town District Centre.

The current use of the Site has been somewhat 'left behind' by the pace and character of new development in the immediate surrounding area. The hotel is on a different scale to other buildings on Silvertown Way. The design and single use of the building has become rather drab and uninspiring now it is surrounded by multi storey, mixed use and high quality new buildings.

It has therefore been identified by our client as appropriate for development in the form of the retention, extension and re-cladding of the existing hotel. The existing hotel is often functioning at maximum capacity and our client wishes to deliver additional visitor accommodation to support the local economy. They are also seeking to improve the external appearance of the hotel and enhance the public realm through extensive landscaping to better respond to the prevailing local context and deliver high-quality design. We are currently discussing the emerging proposals with Officers through pre-application engagement and ongoing discussions with the Design Review Panel.

Background and Context

In April 2022, as part of the Local Plan Review, we completed and submitted the Council's Land Availability Questionnaire in relation to the Site. This confirmed that the Site is available and could provide an opportunity for redevelopment, to include the delivery of much-needed new homes within 5-10 years; thereby well within the new Plan period up to 2038.

In June 2022, following confirmation from the Council that the Site had been identified as potentially available, suitable and deliverable as part of the Local Plan review, we provided Policy Officers with some initial design feasibility work to support the capacity testing exercise. This set out our client's early vision for the Site. In January 2023, this early vision had been further developed and we submitted proposals for the comprehensive redevelopment of the Site to Officers, which comprised a mix of commercial uses (Class E) and residential uses (Class C3) in buildings of up to 28-storeys. The Council's pre-application feedback challenged building heights and density, such that our client determined that the mixed-use scheme (to include housing) would not be viable in the immediate term. Instead, our client has focused on exploring the retention, extension and re-cladding of the existing hotel asset. Since then, we have been discussing the emerging proposals with Officers through pre-application engagement, a Design Review Panel and Members Briefing.

The publication and approval of the Draft Local Plan by Cabinet in December 2022 confirmed the draft allocation of the Site for redevelopment as part of ref. N5.SA3 'Canning Town Holiday Inn', and we submitted representations in broad support of this allocation in February 2023. Whilst our client's aspirations for the site have progressed since our first round of our comments, we continue to support the broad principles set out in the draft site allocation and our detailed comments can be found below.

It is important to note that whilst our client's aspirations for the site in the immediate term comprise the implementation of a hotel extension scheme (subject to securing planning permission), there remains the potential for an alternative approach (to potentially include housing) to be taken on the site should wider market, economic and lifestyle changes dictate such. This is not expected to be within the new Local Plan period, noting this is likely to be less than 15 years and therefore there will be a further review within five years of adoption. We note the draft allocation for the site indicates delivery of development during the medium-term (e.g. year seven) by which point we would expect a review of the Local Plan to be underway and any change in the site-specific circumstances would be promoted on behalf of our client accordingly.

Planning Commentary on the Draft Local Plan

Draft Site Allocation N5.SA3 'Canning Town Holiday Inn'

a) Development Principles (Land Uses)

The draft site allocation N5.SA3 'Canning Town Holiday Inn' covers the area of land between Silvertown Way, Shirley Street and Brunel Street, as shown in Figure 1 below. As shown in the enclosed Site Location Plan, our client has an interest in the land to the west of the allocation, which is currently used as a Holiday Inn Express hotel.

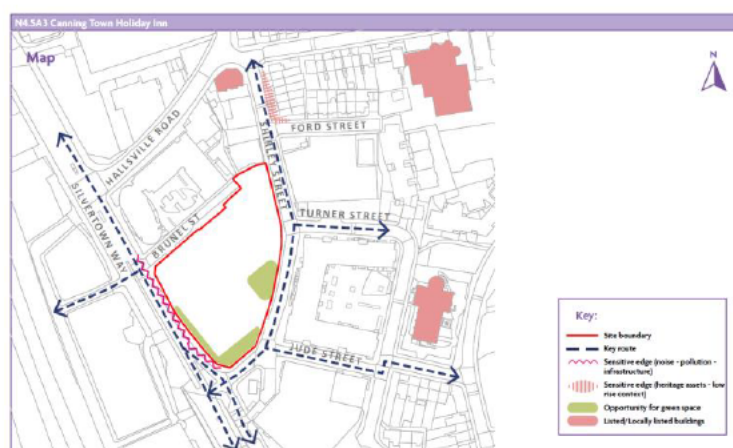


Figure 1: Draft Site Allocation N4.SA3 Canning Town Holiday Inn

The draft site allocation identifies the broader site for: *“residential development, employment uses, open space and main town centre uses and social infrastructure, including community facilities”*. It sets out that *“the type and quantity of main town centre uses should be consistent with a district centre designation and Local Plan Policy HS1”*.

Our client is in broad support of the draft site allocation, which covers their aspirations for redevelopment in the immediate term (hotel extension) and longer term (mixed-use regeneration, to

potentially include housing). The proposed residential, employment and main town centre uses are considered appropriate in principle and supported across the broader site. In particular, the provision of main town centre uses in this location is supported, to include hotels (as defined in the NPPF 2023), given the site's designation within Canning Town district centre and the existing hotel use on the site. We are of the opinion that there is scope to intensify the existing hotel use on the site, as the existing business is often functioning at maximum capacity, attracting demand from visitors to London City Airport, London Excel, the O2 arena etc, and will deliver an increased number of employment opportunities. Evidence of the demand for the hotel extension will be submitted to support any forthcoming planning application.

Alongside the main town centre uses, the draft site allocation seeks to secure *"employment uses"*. It states that *"the employment uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace and provide a range of employment spaces to support the growth of new economic sectors, within E(g) and B use classes"*. Local Plan Policy J1 sets out that *"developments will be expected to support diverse, inclusive and green economic growth and contribute to meeting the borough's office and industrial needs"* and that new employment floorspace should be directed to Strategic Industrial Locations ('SILs'), Local Industrial Locations ('LILs'); retail and leisure parks with good accessibility to the Strategic Road Network; and Local Mixed Use Areas ('LMUA').

The map of Newham's Employment Designations confirms that the site is not designated within a SIL, LIL or LMUA and on this basis we would advocate for the removal of any reference to typical B-class industrial uses within this site allocation. We are of the opinion that the site is unsuitable for B-class industrial uses given the proposed co-location of residential uses on the broader site allocation. Residential uses would be sensitive to the noise and emissions associated with industrial uses on the site, and therefore there would likely be a detrimental impact on neighbouring amenity. We therefore support the aspirations for industrial uses to be located in SILs, LILs and LMUA, in accordance with draft policy J1, rather than on draft site allocation N5.SA3.

We note the importance of securing mixed-use development to support the vitality and viability of Canning Town district centre, and we would advocate for the definition of 'employment uses' being expanded to incorporate main town centre uses. Town centre uses, including hotels, offer a broad range of employment opportunities for local people, including for example managerial positions, reception staff, back of house staff etc, which could also be expanded through the delivery of other main town centre uses on the broader site. These could include retail development; leisure and entertainment; offices, and arts and culture, as defined in the NPPF 2023, which would better complement the provision of any residential accommodation on the site. We therefore think that employment floorspace could be better secured through the provision of main town centre uses on the site, which also includes scope for offices, than typical B-class industrial land.

The draft site allocation also suggests that the site should provide *"social infrastructure, including community facilities"*. It references that *"development should address the need for community facilities in the area by delivering new community facilities in Canning District Centre, unless it can be demonstrated that the needs of the community have already been met. Development should consider all types of community facility, as set out in the Community Facilities Needs Assessment"*

(2022) evidence base. Any provision should meet the requirements of Local Plan Policies SI2 and SI3”.

The Community Facilities Needs Assessment (2022) indicates that there is a good provision of community facilities (community centres, public houses, gallery and places of worship) in relative proximity of the site (see Figure 2 below) and that there has been a gain in community facilities within Canning Town and Custom House through recent consents. It also confirms that the general distribution of community facilities is to the west of the borough, where the Site is located, and that Canning Town and Custom House have the second highest number and density of community facilities with 1.4 facilities per 1000 people.

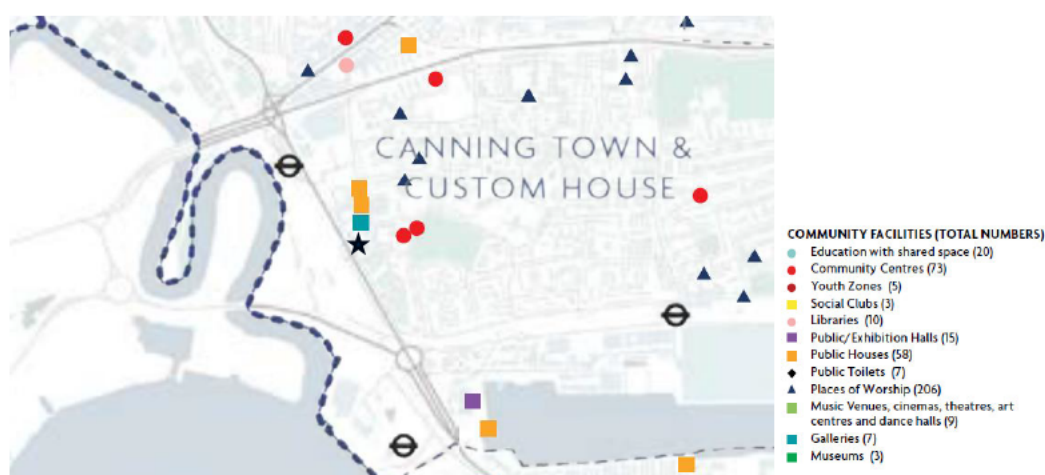


Figure 2: Excerpt of map showing location of Community Facilities in Canning Town & Custom House in Community Facilities Needs Assessment (2022). Approximate Location of Site shown by Star.

The evidence therefore indicates that there may not be a need for community facilities on the site allocation in the immediate future. Development proposals also cannot be expected to address existing deficiencies in the local area but should address any demand that arises from their proposals, in accordance with CIL Regulation 122. It is unlikely that the proposals for the retention, extension and re-cladding of the existing hotel will generate demand for community facilities, as visitors will only be staying at the hotel for a transitory period and will not introduce a new permanent population within Canning Town. It is more likely that any residential accommodation that comes forward on the site could generate demand, which could be addressed through the development management process in accordance with CIL Regulation 122.

The emerging proposals for the retention and extension of the hotel also seek to deliver a variety of facilities that will be open to the public and local community. This will include a new hotel bar and restaurant, conferencing facilities for local workers and a co-working space. These facilities will also be supplemented through the positive qualitative enhancement of the public realm along Silvertown Way to provide well-considered access points; integration with forthcoming plans for Silvertown Way; extensive green infrastructure; alongside the delivery of other benefits for the local neighbourhood, in accordance with draft Policy D2 (Public Realm Net Gain).

b) Design Principles (Masterplanning)

The draft site allocation sets out that *“the site should be designed and developed comprehensively in accordance with Local Plan Policy BFN2”*. Emerging policy BFN2 (Co-designed masterplanning) sets out that *“sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the [inter alia] site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure”*. It also sets out that *“all major applications and applications on site allocations must undertake co-designed masterplanning, through engagement with different stakeholders”*, which should consider the various criteria detailed in the draft policy.

We understand the need for holistic and comprehensive development across site allocations to ensure development works positively within their site constraints and delivers the design and development principles set out in the allocation. We are supportive of this aspiration, but note it is important to ensure site allocations are effective and deliverable, in accordance with NPPF Paragraph 36. Officers will be aware that there are various land owners across site allocation N5.SA3 ‘Canning Town Holiday Inn’, each working to different timescales. There are therefore challenges with delivering the North site on the same timeframes as development at the Holiday Inn Express, and this is outside of our client’s control.

Notwithstanding this, our client and the project team have been exchanging with the North site project team to coordinate the emerging proposals and ensure they do not prejudice each other. This includes consideration of the cumulative impact of the development process, which will be assessed by Officers through the development management process for both applications. Our project team are seeking to ensure that the north site remains futureproofed to allow development to come forward at a later stage (if this would be required). On this basis, we would advocate for the above policies to be amended to require a coordinated approach rather than schemes that are comprehensively co-designed. This will ensure the schemes respond positively to one another and the local context, whilst also ensuring they are not beholden to one another and the aspirations within the site allocation can be delivered in the immediate term.

As we have discussed with Officers, our client is simply seeking to retain and extend the existing hotel business in the immediate term. We are of the opinion that this does not warrant the same level of coordination as a comprehensive mixed-use redevelopment would (as was originally proposed). Our proposal is being carefully designed to ensure it does not prejudice the delivery of any future development to the north, should that come forward, with regard for the Council’s wider aspirations for the draft site allocation.

c) Design Principles (Height and Massing)

Regarding height, the draft site allocation sets out that *“building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 50m (ca. 16storeys) along Silvertown Way”*. It sets out that *“massing should step down towards the northern-eastern part of the site to sensitively*

integrate with the low-rise context". It is noted that the site also falls within a draft tall building zone that identifies a maximum height parameter of up to 50-metres.

We are broadly supportive of the heights proposed within the draft site allocation and the intention to focus taller buildings along Silvertown Way. Our emerging design / massing strategy has sought to respond to the prevailing heights in the immediate context, to include the Effra Gardens development that incorporates heights of up to 16-storeys directly adjacent to the site. Given the site's location in the draft tall building zone, we would advocate for the height parameters identified in the draft site allocation to be shown as 'indicative'. This would allow for flexibility in the design of the building to deliver the most efficient use of land in accordance with national and local policy, and could be managed through the development process with the application of draft policy D4 (Tall Buildings) and London Plan Policy D9, in collaboration with Officers. As per our previous representations, we would also advocate for the indicative height parameters to be stated in metres, rather than stating storeys. This is on the basis that as the Council will be aware, the GLA's standards require a minimum floor-to-ceiling height for residential at 2.5 metres and commercial and other town centre uses could feasibly achieve 3-metres. As such, the inclusion of storey references could be misleading and inaccurate, whereas an indicative maximum parameters on the basis of metres only would be sound and clear in providing robust guidelines for future application proposals.

It is also noted that draft policy D4 (Tall Buildings) provides a series of very detailed design criteria, which sets out that: 1) the footprint of tall building should help to define new green spaces and integrate the development with the existing urban pattern or establish new routes that reinstate historic urban grain; and 2) the base (shoulder height) of tall buildings should generally respect a 1:1 scale relative to the width of the street; and 3) articulation and set-backs should be used to emphasise the relationship between the horizontal (street context) and the vertical (tall building), and to contribute to securing positive amenity spaces and a suitable micro-climate around the building. Proposals for tall buildings will be subject to robust assessment through the application of London Plan Policy D9, to include addressing the visual, functional, environmental and cumulative impacts and therefore we would suggest that the above seems quite onerous for the policy wording. We would therefore advocate that the provision of such detail would be more suitable in supplementary guidance, if to be retained, rather than within the policy wording.

d) Infrastructure Requirements

The draft site allocation sets out that *"Development should address open space deficiencies by providing a pocket park. Community growing opportunities should be provided as part of the site's communal amenity space. In addition to the open space provision, development should provide publicly accessible play space, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm or provided as part of the pocket park"*.

The Newham Green and Water Infrastructure Strategy (2024) sets out there is generally a deficiency in publicly accessible green spaces across the Borough. It raises that Canning Town South, where our site is located is currently deficient relative to the Borough average, and population growth will only make the existing deficit more pronounced (see Paras 5.16 & 5.19). The document also notes

that the current and projected rates of allotment provision is below the standards recommended by the National Allotment Society and there are challenges in the current supply of play-space.

These deficiencies are noted, however development proposals cannot be expected to address existing deficiencies in the local area but should address any demand that arises from their proposals, in accordance with CIL Regulation 122. We would expect the requirements for the provision of open space, community allotments and playspace to be on a demand-basis, which is more likely to arise from the provision of conventional residential accommodation. It is unlikely that the proposals to retain and extend the existing hotel will generate this demand, and we would therefore request that this is clarified within the site allocation wording.

The emerging proposals for the retention and extension of the existing hotel also seek to include extensive green infrastructure along Silvertown Way, which will deliver benefits to the public realm in accordance with draft Policy D2 (Public Realm Net Gain). Whilst this doesn't directly provide a public open park, the size of the site and development principles for a variety of uses to be provided on site limit the potential for a conventional 'park' to be provided on site. We would therefore welcome scope for the provision of green infrastructure rather than a pocket park to be provided on site.

Policies on Visitor Accommodation

Draft Policy HS8 (Visitor Accommodation) sets out that *"hotels and other forms of visitor accommodation will be supported on sites in: a) town and local centres where the function of the primary shopping area is protected in line with Local Plan Policy HS2, and principally within centres in Stratford and Maryland; b) areas within 15 minutes walking distance to the ExCel conference centre"*. It sets out that *"the scale of development should be proportionate to the scale of the centre and/or the tourism or employment function of the area it services, as relevant to the site, justified by market demand testing and a Sequential Test if proposed in an out of centre location. The development should be supported by a Visitor Accommodation Management Plan outlining: a) how amenity and safety will be managed and maintained through the day and at night; b) a servicing plan"*.

We are supportive of the provision of hotels, as a main town centre use, in town centre locations, including Canning Town District Centre. We are also supportive of the provision of hotel accommodation being provided proportionate to the demand, and a hotel needs assessment will be submitted to support our forthcoming planning application. It is also noted that draft policy HS2 (Managing new and existing town and local centres) sets out that *"within town and local centres, redevelopment or refurbishment of sites will be supported where it contributes to the vitality and viability of the centre and optimises the use of the site"*. This aspiration is supported and our proposals accord with this.

It is also noted that draft policy HS8 (Visitor Accommodation) sets out that *"all visitor accommodation should meet the accessibility standards set by London Plan (2021) Policy E10"*. This is supported as it is aligned with the GLA's accessibility requirements for new hotel accommodation.

Proposed Amendment(s) to Key Policies

Policy	Draft Policy Wording and Savills Recommendations in red
N4.SA3 Canning Town Holiday Inn - Development Principles	<p>Residential development, employment-generating uses, open-space green infrastructure (to include public realm and landscaping improvements) and main town centre uses and social infrastructure (subject to an identified demand). including community facilities.</p> <p>The type and quantity of main town centre uses should be consistent with a district centre designation and Local Plan Policy HS1.</p> <p>Demand-generating development (such as residential) should address the need for community facilities in the area by delivering new community facilities in Canning District Centre where this is identified and directly related to a development proposal, unless it can be demonstrated that there is sufficient community facilities to meet the identified need from a development proposal 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.</p> <p>The employment-generating uses should be consistent with Local Plan Policy J1 and prioritise industrial floorspace and provide a range of employment spaces opportunities through main town centre uses to support the site's location in Canning Town District Centre, and the growth of new economic sectors, within E(g) use class and B-use classes.</p>
N4.SA3 Canning Town Holiday Inn - Design Principles	<p>The various site parcels under different land ownership should be designed in a coordinated manner and developed comprehensively ensure they do not prejudice the delivery of other parcels in the site allocation, in accordance with Local Plan Policy BFN2.</p> <p>Indicatively, building heights should range between 21-32m (ea. 7-10 storeys) with taller buildings up to 50m (ea. 16 storeys) along Silvertown Way. Massing should step down towards the northern-eastern part of the site to sensitively integrate with the low rise context.</p>
N4.SA3 Canning Town Holiday Inn -	<p>Development should address provide green infrastructure (to include public realm and landscaping improvements) open-space deficiencies by providing a pocket park. Community growing opportunities should be provided as part of the site's communal amenity space, where there is an identified demand associated with residential accommodation. In addition to the open-space</p>

Infrastructure requirements	green infrastructure provision, demand-generating development (e.g. residential) should provide publicly accessible play space to meet the needs of the development, in accordance with Local Plan Policy GWS5, in the form of a Local Area for Play, which should be playable public realm or provided as part of the pocket park.
Policy J1 (Employment and Growth)	<p>New employment floorspace should be directed to, and delivered in accordance with the following spatial strategy and functional requirements and the design and delivery principles outlined in Local Plan Policy J2:</p> <p>The development of a range of employment-generating floorspace (office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g)(iii)), general industrial (B2) and storage or distribution (B8) and main town centre uses) to support the growth of new economic sectors, is supported on site allocations identified for mixed-use or employment-led development, where the delivered floorspace is in conformity with the development principles set out in the site allocations.</p>
Policy J1 - Table 10 Town Centres	An additional bullet should be added in relation to Major and District Centres to state: "Employment-generating main town centre uses (as defined by the NPPF), the type and quantity consistent with the town centre designation set out under Policies HS1 and HS2".
Policy BFN 2	<p>2. All major applications and applications on site allocations must take a coordinated approach to the delivery of development undertake co-designed site masterplanning, through engagement with different stakeholders. This masterplanning must consider all of the following:</p> <p>a. how the required land uses and infrastructure provision on the site will be delivered; b. relevant neighbourhood and/or site allocation design principles; c. integration of the scheme with its wider surroundings, including any effects on the historic environment; d. delivery of key walking and cycling connections within the site and to and from key local facilities; e. layout of the site to ensure neighbourliness; and f. how Biodiversity Net Gain will be delivered on site, natural features will be incorporated and appropriate mitigation for environmental harm made.</p>

Conclusion

The allocation of the Site within the Draft Local Plan for redevelopment is welcomed and supported. It is noted that our client only has control over a portion of the draft site allocation, within which we feel there is an opportunity to deliver additional visitor accommodation through the retention, extension and re-cladding of the existing hotel. This will help to: secure employment opportunities for the local area; deliver extensive green infrastructure and an enhanced public realm along

Silvertown Way; ensure an efficient use of the site; and contribute to the delivery of high quality design within the first 5-10 years of the new Local Plan period.

Our comments above incorporate proposed amendments to the wording of the draft site allocation and other relevant policies to ensure that the emerging local plan remains effective and deliverable in accordance with tests of soundness set out in NPPF 35.

We would be grateful for confirmation that this letter of representation has been received, and that it will be taken into account. We will look forward to continuing to engage with the remaining stages of the preparation of the emerging Newham Local Plan and would like to reserve the right, on behalf of our client, to comment on any future consultation stages.

Should you have any questions regarding its contents please do not hesitate to contact me at this office.

Yours faithfully

Neil Rowley
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Savills Planning

Canning Town Holiday Inn

