

Sara Chiong

From: Emilia Harrison <[REDACTED]>
Sent: 20 September 2024 16:44
To: Local Plan
Cc: [REDACTED]
Subject: Representation Submission to Newham Regulation 19
Attachments: 240920 - Representations to LB Newham.pdf; LB Newham Response Form.pdf; Design Document.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Planning Policy Team,

On behalf of our Client, please see attached representation to the Newham Regulation 19 Draft Local Plan.

Please can you confirm receipt that this has been received?

Thank you.

Kinds regards,
Emilia Harrison

Emilia Harrison
Planner, London Planning

mobile: [REDACTED]
email: [REDACTED]




Find Us : [Birmingham](#) | [Edinburgh](#) | [Glasgow](#) | [London](#) | [Manchester](#)

Follow us on : [Instagram](#) | [LinkedIn](#) | [Twitter](#) | [Vimeo](#) | [Ian's Blog](#)



The information transmitted, including attachments, is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender and destroy any copies of this information.

Response Form for Regulation 19 Consultation.

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

**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="Iceni Projects"/>	<input type="text" value="IDM Properties LLP"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>

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

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 supporting Cover Letter prepared by Icení Projects.

(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 supporting Cover Letter prepared by Iceni Projects.

(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:

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



Da Vinci House
44 Saffron Hill
London, EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Local Plan Team, London Borough of Newham
Development Control
First floor, West Wing
Newham Dockside
1000 Dockside Road
London
E16 2QU
(via email) localplan@newham.gov.uk

20th September 2024

REPRESENTATION ON LB NEWHAM'S EMERGING LOCAL PLAN

We write on behalf of our client, IDM Properties LLP (IDM), to submit a representation to the London Borough of Newham (LBN) in relation to their emerging Local Plan, which is at the final stages of Examination, with the Regulation 19 Consultation ending 20th September 2024.

The Site

The site is outlined in Figure 1 and is located within the west of LB Newham. A Site Location Plan is also enclosed with this submission. The site is to the west of Canning Road and forms a hard landscaped car park with both GTEC House and Channelsea House. Channelsea House is a former 1970s 6-storey office building, which was converted into residential use via prior approval in 2014, providing 72 residential units (LPA ref. 14/02907/PRECUJ). The surrounding area is mixed use in nature, with residential use to the east, industrial uses to the west, and vacant brownfield sites.

The site also contains two office units. These office units have been vacant and empty since the completion of the conversion works to Channelsea House in 2016. Active marketing has been carried out for an 8-year period by Alexander Reece Thomson, with no interest in this office space.

The site is not within a Conservation Area and there are no listed buildings on site, however is in proximity to the following nearby designated heritage assets within the setting of the following:

- Grade II Listed Engine House
- Grade II Listed West Ham Pumping Station

The site has very good transport links, benefiting from PTAL 6a. It is less than a 10 minute's walk to both West Ham and Abbey Lane station, and the Greenway lies adjacent to the site, providing pedestrian and cycle routes towards the Olympic Park and Stratford central.

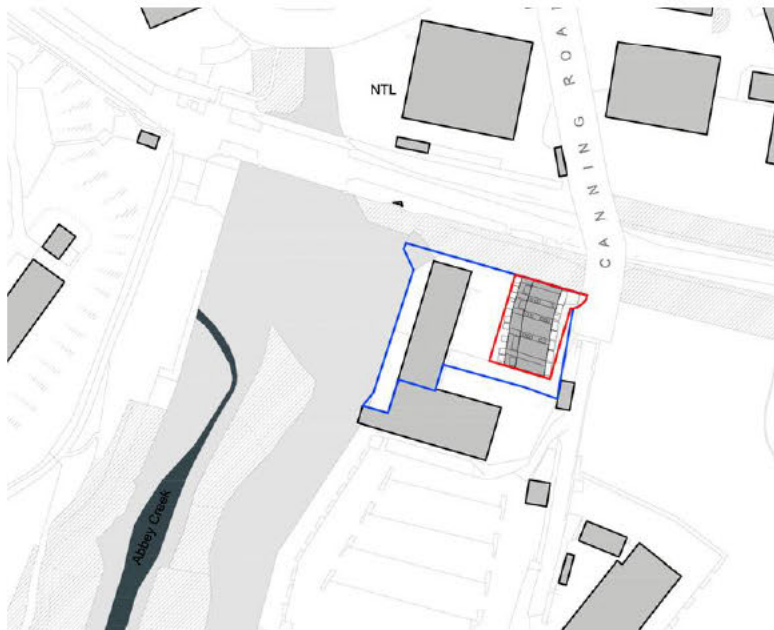


Figure 1: The Site, Newham Employment Land Review 2022, Canning Road LMUA

The following Planning History is relevant to these Representations:

Application ref.	Description	Status
14/01858/PRECUJ	Prior Approval for a change of use of existing Class B1 (Office) part basement, part ground, and entire first, second, third, fourth and fifth floors of Channelsea House to Class C3(residential) to create 51 residential units (20 x studios and 31 x 1bed units)	Application granted 01.05.14
14/02527/PRECUJ	Prior Approval for a change of use of existing Class B1 (Office) part basement, part ground, and entire first, second, third, fourth and fifth floors of Channelsea House to Class C3(residential) to create 51 residential units.	Application granted 19.12.14
14/02571/PRECUJ	Prior Approval for a change of use of existing Class B1 (Office) part basement, and entire ground, first, second, third, fourth and fifth floors of Channelsea House to Class C3(residential) to create 71 residential units.	Application granted 19.12.14
14/02907/PRECUJ	Prior Approval for a change of use of existing Class B1 (Office) part basement and entire ground, first, second, third, fourth, and fifth floors of Channelsea house to Class C3 (residential) to create 72 residential units.	Application granted 26.01.15
17/02614/FUL	Redevelopment of site to provide commercial units across 616 Sqm (B1), 28 residential units (12 x 1 Bed, 8 x 2 bed, and 8 x 3 bed) within the same six (6) storey building envelope previously proposed. (This application is affecting the setting of listed buildings). (Note: Reason for refusal 1, relating to the employment-led development within the LMUA allocation, is of relevance to these Representations)	Application refused 19.12.17 and dismissed at appeal 03.04.19

Summary of Representations

Noting the importance of paragraph 35 of the NPPF, the emerging Local Plan raises a number of concerns, and modifications are proposed to 'Policy J1 – *Employment and Growth*'. Of relevance to the site, and at a high level we understand:

- Policy J1 (1) – identifies the need to deliver and support diverse, inclusive and green economic growth within Newham, noting the need for 10,000 new jobs, 335,000 sqm industrial floorspace and a minimum of 90,000 sqm of office floorspace over the Plan period.
- Part J1 (2c) – identifies Local Mixed-Use Areas (LMUA), which is an employment-led allocation, protecting and promoting uses for office (E(g)(i)), research and development (E(g)(ii)), light industrial (E(g) (iii)) and storage or distribution (B8).
- LMUA9 – identifies the LMUA allocation for Canning Road West. The priority uses are noted to be light industrial, small-scale office and flexible workspaces, and SMEs, manufacturing and production. The design and delivery principles are employment led co-location, with residential supported.
- Part J1.2 identifies the implementation strategy of the LMUA allocation, noting that employment-led development is a priority to meet employment needs with other uses, such as residential, secondary. Co-design and market engagement exercises are recommended to establish optimum quantity and format of employment space to meet market demand on the site.

Response to Draft Local Plan

The Canning Road West LMUA Designation

The site is within the Canning Road West LMUA, and therefore any future development on this site would have to be employment-led to align with draft Policy J1.2.

The Employment Land Review¹ outlines that LMUA9 allocation comprises 3 specific sites:

- The north west of the allocation is occupied by an industrial training facility, within the former engine room for the West Ham Pumping Station
- The eastern portion is occupied by plant services facilities and yard
- The south (the site) is a former office building which is now in residential use (Channelsea House), and the second block (GTEC House), which is in relatively poor condition

The LMUA9 is physically divided by the Greenway and is recognised as “*separate clusters*”² with each site “*relatively self-contained*”³. As can be seen within Figure 2, the southern part of the allocation is particularly separate from the other two sites, and due to its location sits as its own entity. Furthermore, in terms of land use, it is again an anomaly within this allocation, having minimal economic output or use, being predominately residential in nature.

The only commercial use within this cluster is GTEC House, which has a very low employment density and, as recognised in the Employment Land Review, is of poor quality. IDM therefore believe the wider site should be characterised as predominantly residential.

The Employment Land Review states that when considering sites for LMUA status, sites that were remote from other employment areas were not included. Since the southern portion of LMUA9 is both physically and economically isolated from the rest of the LMUA9, it is unclear why it has been included.

¹ July 2022, Appendix E, Land Audit LMUAs

² Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119

³ Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119

There is no viable existing commercial space on site that is worthy of protection, as per the definition of the LMUA, and there are no existing businesses co-locating or receiving mutual benefit across the wider area. Given the approach outlined in the Employment Land Review, its inclusion within the allocation is wholly inappropriate.

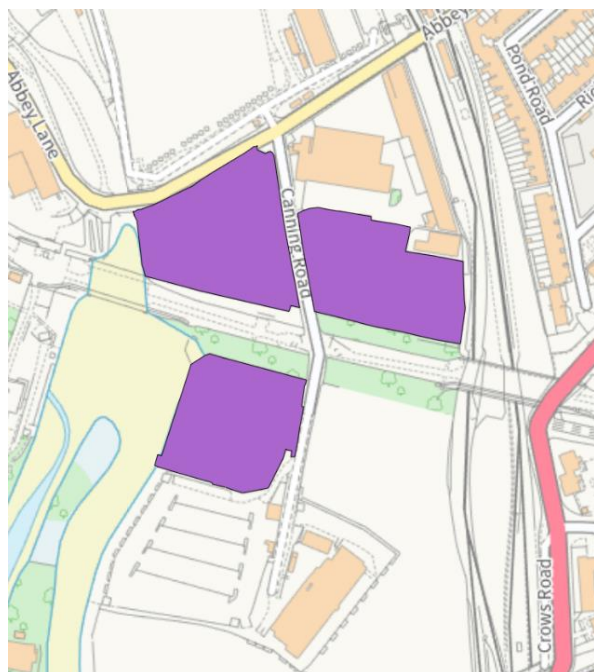


Figure 2: The Canning Road West LMUA, Newham Draft Policies Map

Implication of LMUA Designation

IDM consider that the existing hardstanding area to the front of Channelsea House has development potential for a building of circa six storeys in height. This is supported by a planning application (LPA ref. 17/02614/FUL where, although dismissed at appeal, the following planning considerations were agreed as acceptable by LB Newham⁴:

- Density and Height
- Design
- Impact on nearby Heritage Assets
- Impact to neighbouring amenity

Should IDM wish to progress development proposals for a similar project, the scheme would need be a commercially-led mixed use scheme to align with Draft Policy SJ1.2. This scheme would necessitate the provision of office floorspace alongside new residential floorspace, with this office floorspace needing to be the principal land use (i.e. more than 50% of total floorspace) for the scheme to be commercially-led.

There is no demand for office floorspace in this location. This is evident in the long-term vacancy of the existing office units within Channelsea House and also supported by evidence in the Council's Employment Land Review. The implication of the LMUA Designation means that no development shall

⁴ Committee Report LPA Ref: 17/02614/FUL, 18th December

come forward on site or, if it did come forward, the office space is likely to sit vacant for a significant period of time.

IDM wish to make the following points to justify this position:

- The Employment Land Review references the refusal of application reference 17/02614/FUL, in particular Reason for Refusal 1. Given the application was refused in 2019, the assessment that took place in relation to that application is now outdated, and the commercial market has experienced significant macro and microeconomic changes over the past five years.
- This does not go unrecognised within the Employment Land Review, stating that the “adopted Plan was underpinned by a 2017/18 Employment Land Review (ELR) study, and to support the new Plan a refresh of the ELR is needed. This is particularly so because of the recent impact of Brexit and Covid related macro-economic ‘shocks’, but also due to other changes - to national planning policy such as the introduction of Use Class E, the adoption of a new London Plan in 2021 and because planning responsibilities for the LLDC area will shortly return to the Borough Council”⁵. Given the evidence base does acknowledge the significant economic changes that have taken place over the last 5 years, these should be further considered when reviewing the sites inclusion within the LMUA9.
- The Employment Land review further notes that “Newham is not a major office location”, and any growth in floorspace is focused on the regeneration of Stratford and the Royal Albert Docks (which now benefits from Crossrail). The study concludes that the office market has a large supply that outstrips demand in Newham, and consequently any office space should be directed towards Stratford Town Centre.
- It is further acknowledged that there has been a shift in office demand from similar out-of-centre sites to town and city centres where there is access to local amenities, and whilst discussing the site, it is noted⁶ that the site has limited access to local convenience, facilities or shopping areas, with the nearest retail centre located 600m away at Church Street Local Centre. The site is therefore not favourable for employment-led development due to its location, and given these research findings, it should be questioned as to why the site has been included within the LMUA9.

Ultimately, the implication of the LMUA designation is that any employment-led development that is brought forward on this site would encounter significant viability challenges, with much of the floorspace remaining vacant, limiting its contribution to Newham’s economy and wider placemaking.

With the principle of development on the site agreed, it is important that this contributes positively to wider placemaking and good planning within LB Newham. The enclosed Design Document, prepared by IDM Developments and submitted as part of these representations, showcases the high-quality proposal that could come forward, delivering 35 homes. With the delivery of new homes a pressing need on all London Boroughs, allowing residential-led development on a very underutilised site would make an important contribution towards this. The site also offers a highly sustainable location for new residential use, and the proposed ‘Three Mills Neighbourhood’⁷ confirms the suitability of residential use within this location, and in addition to Channelsea House, would provide a suitable setting for further residential-led development.

Proposed Alterations

Based on the evidence presented above, the following alterations are suggested to the emerging Local Plan:

⁵ Employment Land Review July 2022, page vii

⁶ Employment Land Review July 2022, Appendix E, Land Audit LMUAs, page 119

⁷ Newham Emerging Local Plan, Policy N7

- The LMUA9 designation should be amended so that it this only includes the northern and eastern parts with the southern portion removed from this allocation. This should also be updated on the draft Policies Map, with the layer relating to LMUA amended so this only includes the northern and eastern portions.
- The emerging Local Plan should recognise the site as a sustainable location to bring forward residential-led mixed-use development, and the contribution it can make to the boroughs growing housing need. The site should therefore be allocated for either a residential or residential-led mixed use development.

Conclusion

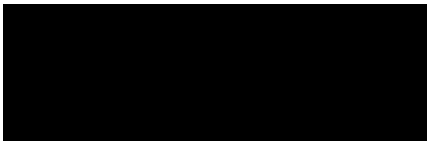
This representation has been made on behalf of IDM to the LB Newham in relation to their emerging Local Plan.

We reiterate our strong position that the LMUA9 designation needs to be reconsidered, specifically in relation to the southern part of this (the site). At present, this fails to understand the physical and economic separation of the site, as well as the lack of demand for office floorspace within this location.

It has been suggested that the LMUA9 allocation is amended to exclude the southern portion of the site, to enable residential-led development which would be a key to unlocking sustainable growth within Newham, promoting good placemaking.

Should you wish to discuss the contents of this letter, please do not hesitate to contact either Lewis Westhoff (lwesthoff@iceniprojects.com) or Emilia Harrison (eharrison@iceniprojects.com).

Yours faithfully,

A large black rectangular box redacting the signature of the sender.

ICENI PROJECTS LIMITED

Enc

Design Vision Document, prepared by IDM



DEVELOPMENT POTENTIAL AT LAND
TO THE FRONT OF CHANNELSEA HOUSE

Channelsea House, Canning Road,
London E15



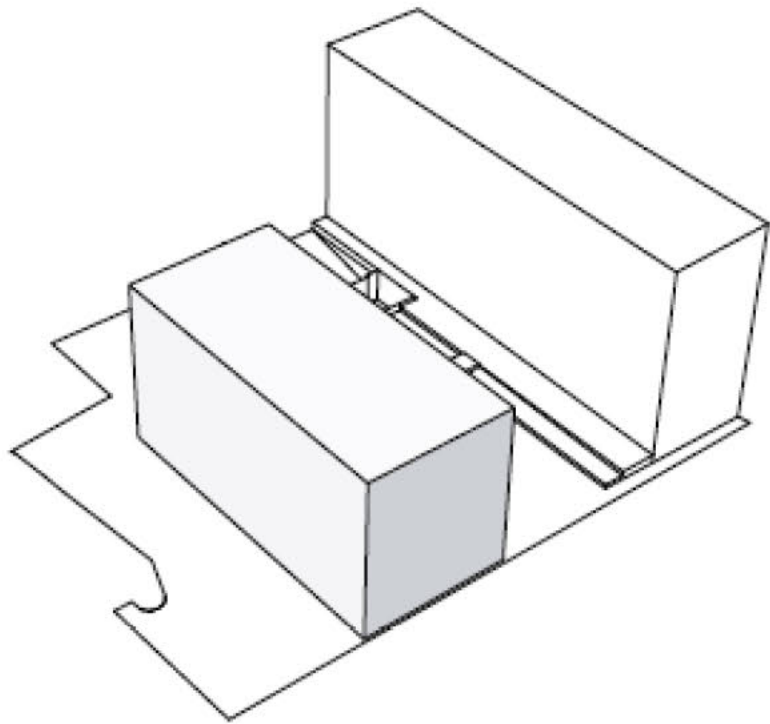
1.0 SITE LOCATION:

1.1 KEY VIEWS

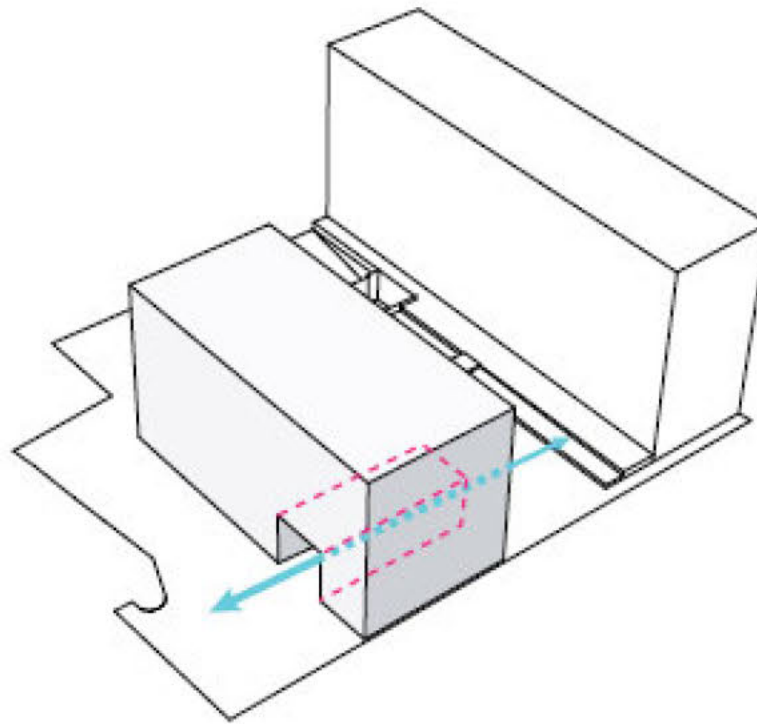


2.0 DESIGN PRINCIPLES:

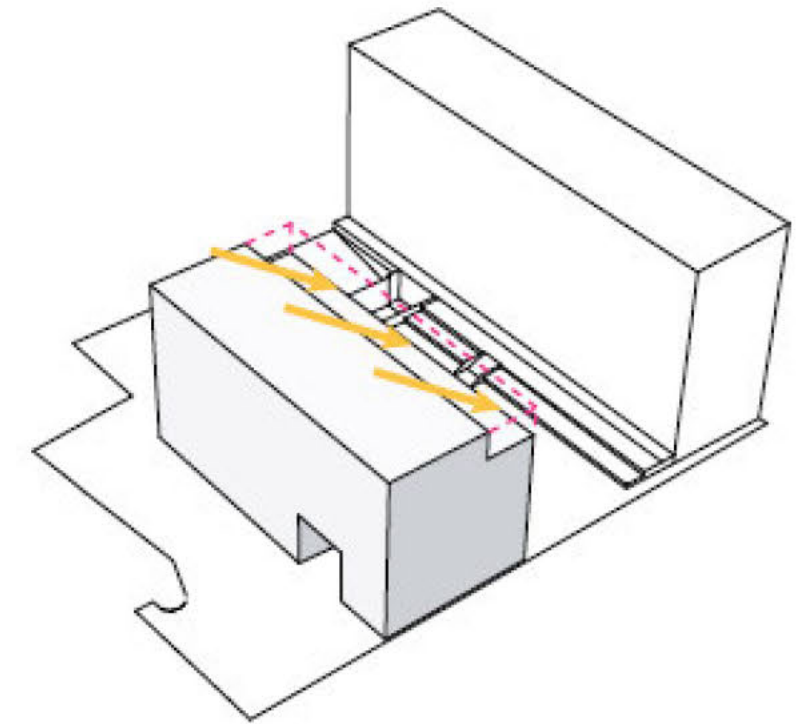
2.1 MASSING STRATEGY



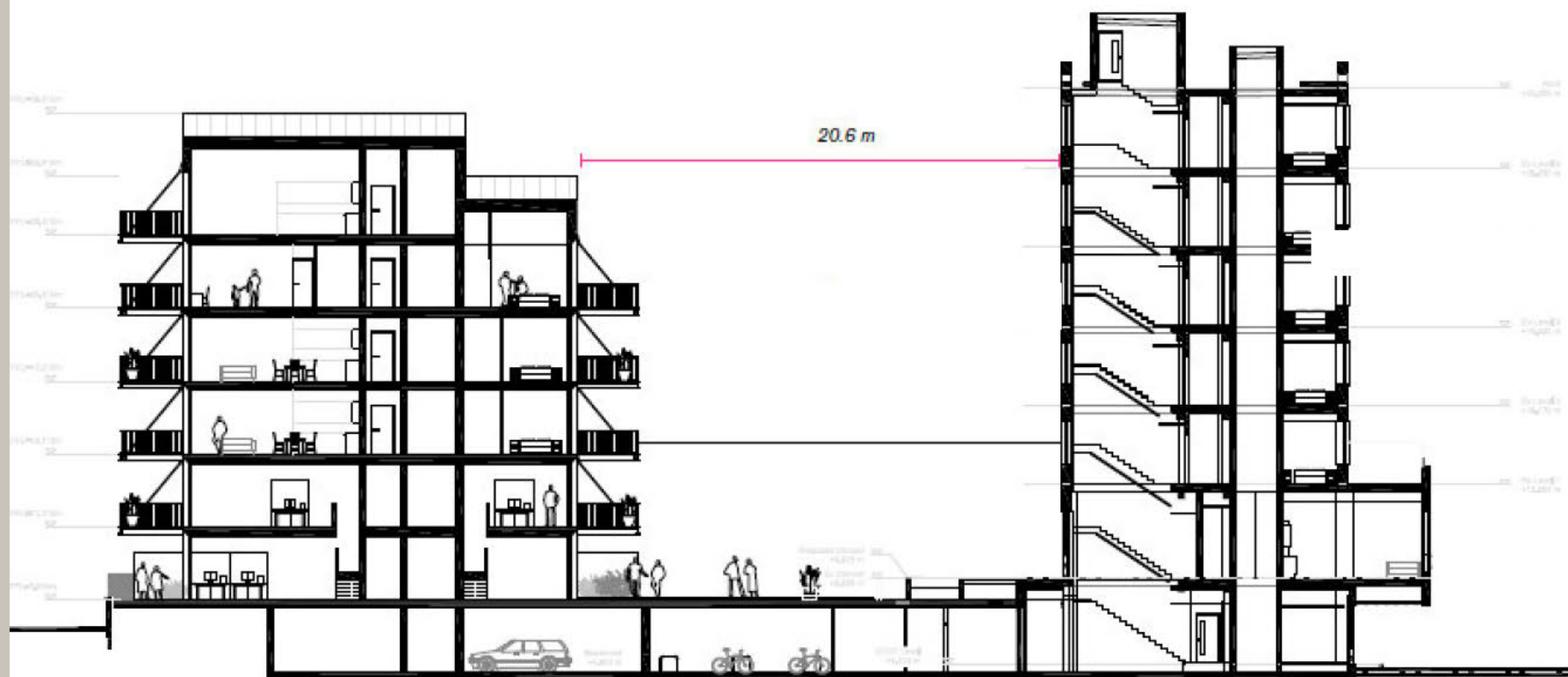
1.0 Initial block massing



2.0 Creating through access to the rear of the site



3.0 Reducing building mass on the top floor to allow suitable daylight/sunlight into the courtyard



4.0 Retain suitable distance between existing Channelsea House habitable rooms and proposed development

3.0 DEVELOPMENT POTENTIAL:

3.1 DESIGN PRINCIPLES



3.0 DEVELOPMENT POTENTIAL:

3.2 AREA SCHEDULE

Floor	Ref no	Beds	HR	GIA sqm	GIA sqft
Ground	1	3	4	104	1119
	2	3	4	102	1098
	3	3	4	84	904
	4	3	4	84	904
	5	3	4	84	904
	6	2	3	67.4	725
	7	3	4	90.9	978
First	8	1	2	54.2	583
	9	1	2	50.5	544
	10	2	3	70.5	759
Second	11	1	2	53.4	575
	12	2	3	64.3	692
	13	2	3	70.2	756
	14	1	2	50.1	539
	15	2	3	70.0	753
	16	1	2	53.2	573
	17	2	3	50.4	543
	18	2	3	70.2	756
Third	19	1	2	53.4	575
	20	2	3	64.3	692
	21	2	3	70.2	756
	22	1	2	50.1	539
	23	2	3	70.0	753
	24	1	2	53.2	573
	25	2	3	50.4	543
	26	2	3	70.2	756
Fourth	27	3	4	95.3	1026
	28	3	4	102.0	1098
	29	3	4	96.1	1034
	30	3	4	100.1	1077
	31	3	4	105	1130
Fifth	32	3	4	86.0	926
	33	2	3	70.0	753
	34	3	4	95.6	1029
	35	3	4	100.2	1079
Total			111	2605.4	28044

	1 Bed	2Bed	3 Bed	Total
Ground		1	6	7
First	2	1		3
Second	3	5		8
Third	3	5		8
Fourth			5	5
Fifth		1	3	4
Total Units	8	13	14	35
Total HR	16	39	56	111

SECRET
IDM
UNCLASSIFIED