

Sara Chiong

From: Landsberg, Paul @ London <[REDACTED]>
Sent: 20 September 2024 13:11
To: Local Plan
Cc: [REDACTED]
Subject: DRAFT SUBMISSION LOCAL PLAN (REGULATION 19) June 2024
Attachments: East Ham Primark - Reg 19 Reps.pdf; Response_form__Final (East Ham Primark).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Planning Policy Team,

Please see the attached Regulation 19 representations made on behalf of my client Primark Stores Ltd.

I look forward to hearing about the next stages of the emerging Local Plan.

Kind regards,

Paul

Paul Landsberg (MRTPI)
Director
CBRE | UK Development - Planning
London
T [REDACTED]



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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:**

Draft Submission Local Plan (regulation 19) June 2024

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.

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Know your rights

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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" value="Primark Stores Ltd"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Paul"/>
Last Name	<input type="text"/>	<input type="text" value="Landsberg"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text"/>	<input type="text" value="CBRE"/>
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
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"/>
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4.(2) Sound	Yes	<input type="text" value="x"/>	No	<input type="text"/>
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4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>
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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.

n/a

(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 attached CBRE letter dated 20 September 2024

(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:

In order to represent my client at the Public Examination in order to bring forward the Local Plan amendments referred to in the CBRE letter dated 20 September 2024

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

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20 September 2024

Submitted via email only: localplan@newham.gov.uk

Representations to Newham Draft Submission Local Plan (Regulation 19)

Introduction

CBRE act for Primark Stores Ltd ('Primark'), who are owners of the Primark site in East Ham.

The East Ham neighbourhood is located in the east of the borough. It is bounded by Woodgrange Park Cemetery and the railway line to the north and the North Circular Road to the east. The railway line that runs east to west and High Street North which runs north to south cut across the neighbourhood.

Barking Road runs east to west in the south of the neighbourhood, intersecting with High Street North and High Street South. The neighbourhood is predominantly residential in character, consisting of terraced housing along gridded streets. East Ham is a Major Town Centre and is the third largest town centre in Newham. The East Ham Major Centre runs north to south along High Street North and eastwards from the junction with Barking Road. The major centre provides well known national retail chains along with a market and independent and specialised shops and food and drink offer. It also has a strong representation of financial and business services but there remains an extremely high number of betting shops and hot food takeaways.

High Street North provides a local retail offer as does Katherine Road. The neighbourhood has 43 community facilities, including a number of civic buildings, higher education facilities, community centres and 28 places of worship. The neighbourhood's provision of community facilities is above the Newham average number of community facilities per km2.

The East Ham Primark site is located towards the southern end of High Street North, on the corner with Pilgrims Way. The 'L-shaped' site (0.5 ha) extends to northwards alongside the Ron Leighton Way car park, with a three-storey terrace of buildings to the east, consisting of commercial units to ground floor and mixed uses on upper floors. The area is generally low-rise and residential in nature, but includes High Street North and other parts of the East Ham Town Centre, with a number of tall buildings extending up to 15-storeys in the immediate vicinity.

The East Ham Primark store consists of a large two-storey retail unit fronting onto High Street North, wrapping along Pilgrims Way, with ancillary storage and servicing off Ron Leighton Way. The site address is 51 High Street North, London, E6 1HZ (the 'Site').

Vision and Objectives

Primark support London Borough of Newham's ('LBN') Vision and Objectives for the Borough, including the changes proposed within East Ham, for example, East Ham being identified as a Transform Area. Primark seek to work proactively with LBN to help transform the Site in the future.



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Draft Policy BFN1: Spatial Strategy

Draft Policy BNF1 states that:

“Development will be directed to all of Newham’s 17 neighbourhoods to distribute the benefits of growth, achieve Community Wealth Building outcomes and create a network of successful and well-connected neighbourhoods. This will be achieved through...

supporting incremental change in...East Ham...neighbourhood through the enhancement of each neighbourhoods’ character and the delivery of site allocations.

...Development will meet the retail and leisure needs of residents, workers and visitors by...directing main town centre uses to the borough’s network of Metropolitan, Major, District and Local Centres and supporting their diversification and in some cases expansion....”

Primark support the objectives of the Spatial Strategy, in particular the enhancement of the East Ham neighbourhood, and the delivery of site allocations, and meeting the retail needs of the Borough and its residents, workers and visitors.

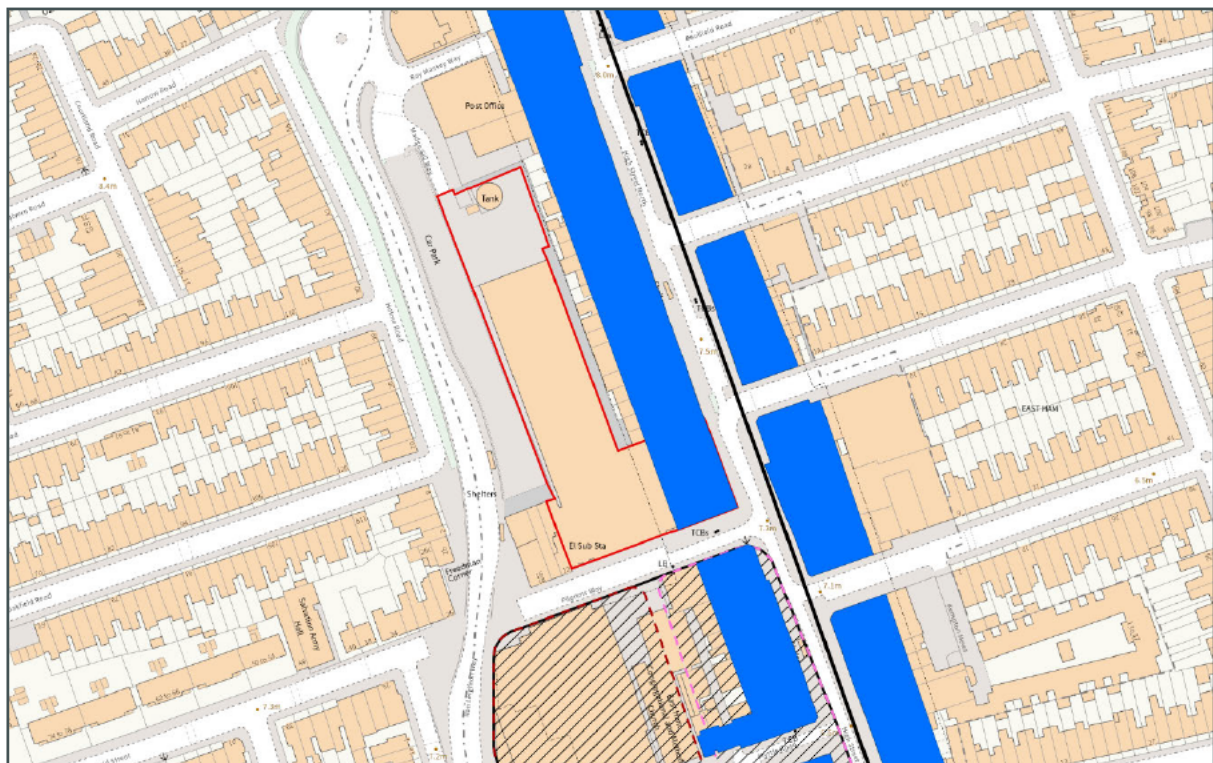














FIGURE 1 - EXTRACT OF EMERGING POLICIES MAP SHOWING SITE ALLOCATION & PRIMARY SHOPPING FRONTAGE

Primary Shopping Frontages [HS1]  Site Allocations 	Town Centres [HS1]  District Centre [HS1]  Major Centre [HS1]  Metropolitan Centre [HS1]	Tall Building Zones [D4]:  32  40  50  60  100	Tall Building Zones : Prevailing Height [D4]:  Above 21m but below 32m (7-10 storeys)  Above 9m but below 21m (3-7 storeys)
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BFN2: Co-designed masterplanning

Draft Policy BNF2 states that:

“1. Sites should be designed and developed comprehensively. Piecemeal delivery will be resisted, particularly where it would prejudice the realisation of the relevant neighbourhood vision, neighbourhood policy, site allocation development principles and/or site allocation design principles or where the timing of delivery would be unsupported by infrastructure.

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2. All major applications and applications on site allocations must undertake co-designed site masterplanning, through engagement with different stakeholders. This masterplanning must consider all of the following:

- 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.*

3. All masterplans should demonstrate how the site will support the delivery of all of the following objectives:

- a. increased opportunities for social interaction.*
- b. mixed, inclusive and stable communities.*
- c. environments which support good physical and mental health.*
- d. spaces young people can thrive in.*
- e. zero carbon, climate resilient neighbourhoods.*
- f. Inclusive design, with buildings and public spaces whose use and design reflects and meets the needs of Newham’s diverse population; and*
- g. Community Wealth Building.*

4. All phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how vacant and underused plots will be activated.

5. All developments on site allocations are expected to undertake post occupancy surveys and share the results with the Council”.

Primark support LBN’s objectives for co-designed masterplanning of sites.

BFN3: Social Value and Health Impact Assessment - delivering social value, health and wellbeing

Draft Policy BFN3 states that:

“All developments in Newham should maximise social value and to make a positive contribution to the health and wellbeing of our communities....”.

Primark support LBN's objectives of maximising social value for the East Ham neighbourhood and wider community.

Draft Policy HS1: Newham's Town Centres and Draft Policy HS2: Managing new and existing town and local centres

Primark support the key functions of East Ham Town Centre, which is a Major Town Centre in scale. This includes meeting the retail, leisure, civic and services needs of all Newham residents, meeting local community use and post-16 education hub needs. Primark also supports LBN's implementation strategy, which seeks to ensure that main town centre uses at or above 2,500 sqm within Stratford Town Centre do not detrimentally impact the viability and vitality of East Ham Town Centre.

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Primark agree with LBN's support for redevelopment and refurbishment of sites within town centres, and the objective of residential use as part of mixed-use redevelopments, which is strongly supported by LBN.

Draft Policy D3: Design-led site capacity optimisation

Draft Policy D3 states that:

"All new-build (including mixed use) developments should apply the design-led approach, as set out in London Plan (2021) Policy D3, the relevant Local Plan Neighbourhood policies, and any relevant design guidance or code...."

All new development and extensions should integrate with the wider neighbourhood grain, scale and massing. Density and height increases may be appropriate where it would respect local character and in line with Local Plan Policy D4...

In areas identified as suitable for transformation of character, all developments should remain attentive to the character of their neighbourhood and wider area and help create fully integrated neighbourhoods..."

Primark strongly support the objective of optimizing site capacity through design, and allow for the opportunity of appropriate height and massing through appropriate justification, and delivery of wider public benefits.

Draft Policy D4: Tall buildings

Draft Policy D4 states that:

"Tall buildings in Newham are defined as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements).

Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1".

Table 1, on page 70 of the Draft Submission Local Plan (Regulation 19 – June 2024) provides a table of Tall Building Zones, and for Tall Building Zone 3, in reference to East Ham, it states that:

- "Height Range Maximum: 32m (ca. 10 storeys) with opportunity for one tall building element at 50m (ca. 16 storeys) in the defined area;
- Prevailing heights should be between 9m and 21m (ca. 3-7 storeys);

- Opportunity to include tall building elements up to 32m (ca. 10 storeys);
- Limited opportunity in the far north east corner to include a tall building element up to 50m (ca. 16 storeys) in the defined area;
- Tall building elements should be limited in number and height, scale and massing should be assessed to avoid harm to the significance of relevant heritage assets; and
- Development should be mindful of height transitions when delivering higher densities”.

Draft Policy D4 states further that:

“All tall buildings should be of high quality design and environmental standards, and...

achieve exemplary architectural quality and make a positive contribution to the townscape through volumetric form and proportion of the mass and through architectural expression of the three main parts of the building: a top, middle and base...”.

The Draft Submission Local Plan (Regulation 19 – June 2024) document includes a map of Newham’s tall building zones, which is shown below:

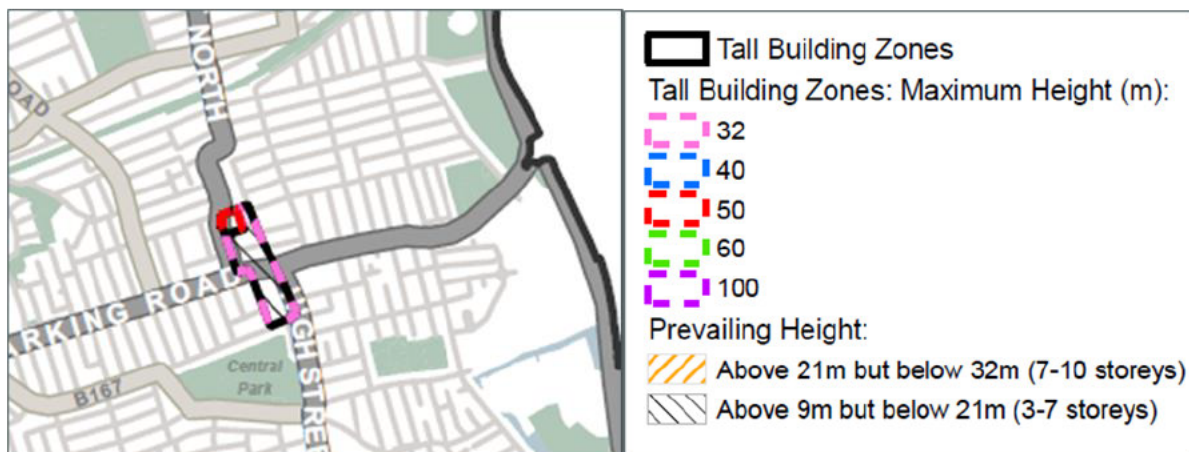


FIGURE 2 – MAP OF NEWHAM’S TALL BUILDING ZONE – EXTRACT FOR EAST HAM

The definition of tall buildings in Newham is in line with the definition of the London Plan 2021. A tall building in Newham is any building over 21m measured from the ground to the top of the highest storey of the buildings (excluding any required and appropriately designed parapets, roof plants, equipment or other elements). Recognising that using storeys provides a simple way to illustrate height, an indicative estimation of number of storeys, which could be achieved, is provided for explanatory purposes only, with the assumption of a typical residential floor-to-floor level of 3m. As it is recognised that storey heights vary between land uses and constructions methods, the tall buildings definition covers all buildings of 21m, irrespective of use and related floor-to-floor height.

Designated Tall Buildings Zones are identified in the Policies Map. The Tall Building Zones Map identifies the maximum permissible heights and where the prevailing height of new developments could be between 9m and 21m and where the prevailing height can exceed 21m, but should be below 32m. The varying heights across Tall Building Zones allow for transitioning heights to surrounding context and sensitive areas.

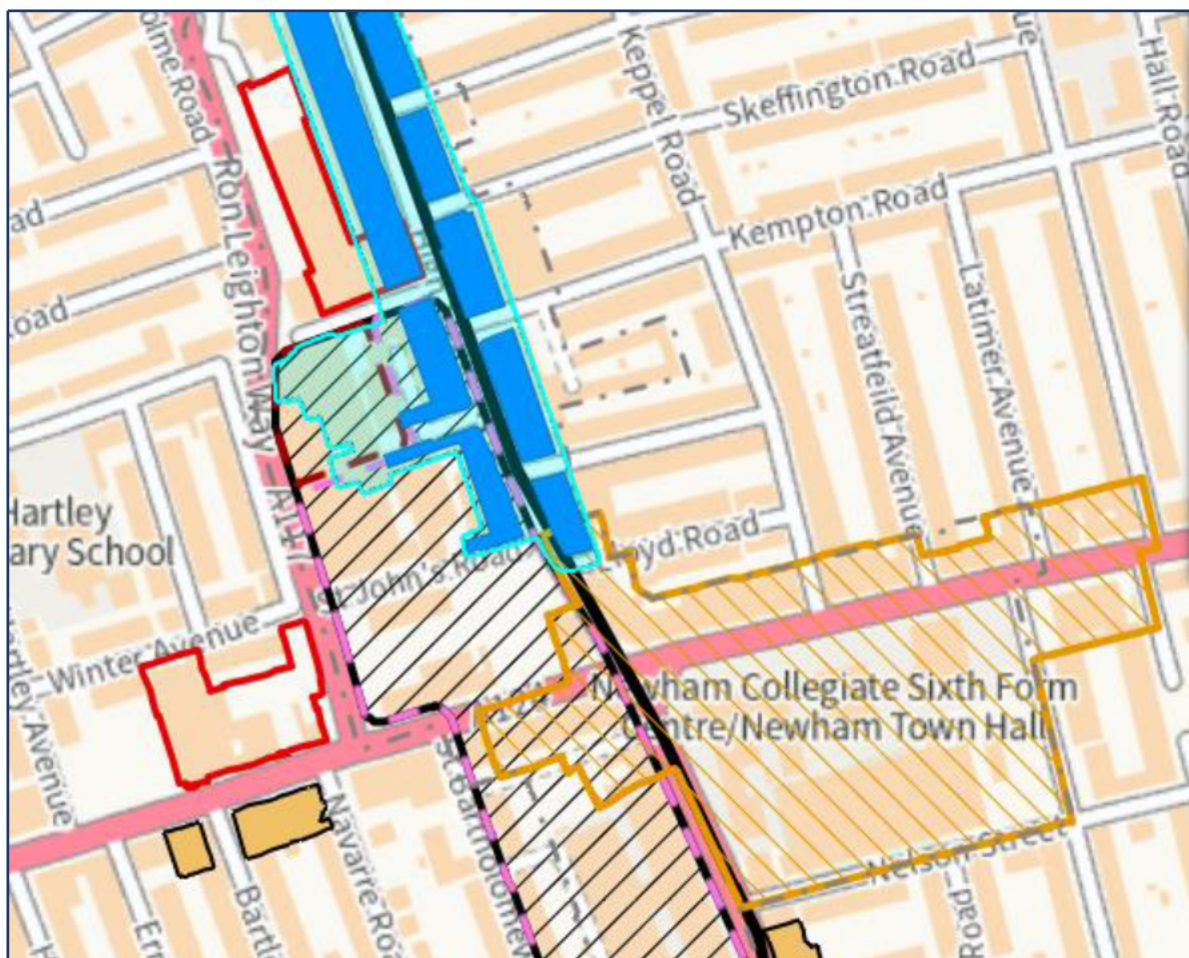


FIGURE 3 – TALL BUILDINGS ZONE – EXTRACT OF NEWHAM'S POLICIES MAP

While the Map of Newham's Tall Building Zone in Figure 2 above appears to indicate that the Site falls within a Tall Building Zone, when you undertake a further analysis of the draft Policies Map, it is clear that the Site is outside the Tall Buildings Zone for East Ham.

It is acknowledged that the Site has a “sensitive edge (heritage assets – low rise context)” due to its relationship with the three-storey terrace on its eastern boundary, however it is considered that southern portion of the Site could accommodate a tall building. Through design-led site capacity optimisation, in line with draft Policy D3, and subject to high quality design, and townscape and visual impact analysis, it is considered that a tall building could respond to the prevailing context created by the New Market Place (up to 15-storeys) and the Brick Yard (up to 11-storeys) developments. As shown above in Figure 3, draft Policy D4 allows for a tall building of up to 50m in height directly opposite the Site, therefore it is considered that a tall building on the Primark site could be easily accommodated in this existing and emerging context.

Primark does not support the designation boundaries of the Tall Building Zone in East Ham, and requests that the boundary of the Tall Building Zone is amended to include the southern rectangular-shaped part of the Site.

Draft Site Allocation N13.SA2 East Ham Primark

The development principles within the draft site allocation for the Site identifies the potential future uses on site as residential, retail and social infrastructure including community facilities. The draft site allocation also seeks the delivery of social infrastructure/community facilities, which has been introduced since the Regulation 18 consultation.

In terms of design principles, the draft site allocation seeks for the Site to be designed and developed comprehensively in accordance with draft Policy BFN2 (Co-designed masterplanning), and that the opportunity to include the adjacent car park as part of the comprehensive development of the site should be explored.

The design principles also state that:

“Mid-rise residential buildings below 21 m (ca. 7 storeys) are the most appropriate form of development, which sensitively integrate with the scale and massing of the existing urban fabric. Development to the rear of the High Street North should be set back from existing buildings and should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, by following the existing building line on High Street North”.

The site allocation also seeks for the provision of a pocket park on Pilgrims Way to be explored, which is also a new introduction since the Regulation 18 consultation.

Primark supports the site allocation for the Site, and supports the development principles of residential and retail use, however, it requested that the requirements for social infrastructure and community facilities is removed, or sufficient flexibility is introduced into the wording for the site allocation.

LBN themselves recognise that there is already an above average number of community facilities in the East Ham neighbourhood (see page 550, paragraph 4.62), therefore, it is queried whether a community facility would be needed within the site allocation.

Paragraph 4.62 (page 550) of the Draft Submission local Plan (Regulation 19) document states:

“The neighbourhood has 43 community facilities, including a number of civic buildings, higher education facilities, community centres and 28 places of worship. The neighbourhood’s provision of community facilities is above the Newham average number of community facilities per km2”.

The development principles of social infrastructure and community facilities have been introduced into the site allocation since Regulation 18, and if adopted, would introduce a further viability challenge to the delivery of a redeveloped site. The Site is already expected to deliver housing, affordable housing, public realm improvements, open space and other public benefits, however, the design principles do not acknowledge these further challenges by allowing for a tall building on part of the Site. The impact of redevelopment of the Site on the trading of the Primark store should also be acknowledged and recognised in the draft site allocation, in terms of the potential viability challenges, to encourage the redevelopment of the Site.

While new ‘asks’ are being introduced to the site allocation since Regulation 18 stage, the height parameters within the site allocation have effectively remained the same. In the first instance, it is requested that flexibility is brought into the site allocation regarding the development principles with the wording amended as follows (new text in bold and deletions in ~~striketrough~~):

“Development principles

*Residential ; **and retail. Social infrastructure, including community facilities, **should be explored.****”*

Primark acknowledges the prevailing low-rise context across the majority of the East Ham neighbourhood, however, along High Street North and Ron Leighton Way, a new context is emerging with tall buildings, and the site directly opposite Pilgrims Way is designated for tall buildings, including one extending to 50m in height. Therefore, it is requested this context is recognised, and if the site allocation wording is not amended as detailed below, it is requested that sufficient flexibility is introduced into the wording to allow a tall building on the southern part of the Site through adequate justification i.e. high quality design, townscape and visual impact analysis, and ensuring there is no detrimental impact to surrounding residents and businesses. Primark supports the design principle of a sensitive scale of development to the rear of the existing buildings fronting onto High Street North.

In terms of the design principles, it is requested that wording of the site allocation is amended as follows (new text in bold and deletions in ~~strikethrough~~):

*“Mid-rise residential buildings below 21 m (ca. 7 storeys) are the most appropriate form of development, **with an opportunity for a tall building on the southern part of the site to be explored**, which sensitively integrates with the scale and massing of the existing urban fabric. Development to the rear of the High Street North should be set back from existing buildings and should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, by following the existing building line on High Street North*

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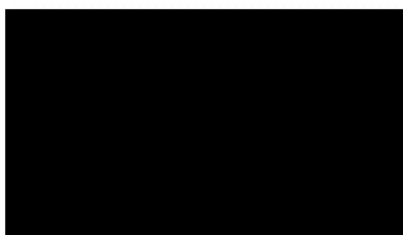
Any tall building should be designed and developed comprehensively in accordance with Local Plan Policies BFN2 and D4”.

General Comments

Overall, Primark support LBN’s vision and objectives for the Borough, and the transformation of the East Ham neighbourhood. However, it is requested that as described above, sufficient flexibility and amendments are introduced into Policy D4 (Tall buildings) and the East Ham Primark site allocation (N13.SA2).

Primark would welcome continued engagement on the emerging new Local Plan and continue to engage positively with LBN on their vision for the East Ham neighbourhood, and East Ham Primark site.

Yours sincerely,



Paul Landsberg
Director - Planning
CBRE Ltd.

FOR AND ON BEHALF OF PRIMARK STORES LTD.