

Sara Chiong

From: Dylan Chaplin <[REDACTED]>
Sent: 20 September 2024 14:28
To: Local Plan
Cc: [REDACTED]
Subject: Consultation on the Newham Draft Submission Local Plan (Regulation 19) - on behalf of abrdn
Attachments: abrdn Representations on Newham Draft Submission Local Plan (Regulation 19).pdf; Reg 19 Response Form.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,

On behalf of our client abrdn, please find attached a letter of representations on the Newham Draft Submission Local Plan (Regulation 19).

Also attached is a response form, however, please refer to the letter for our representations in detail.

I would be grateful if you could confirm receipt of this email and the attached representations.

Kind regards,
Dylan

DYLAN CHAPLIN
ASSISTANT PLANNER

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE

m: [REDACTED] e: [REDACTED]




This e-mail is intended solely for the person to whom it is addressed. It may contain confidential or privileged information. If you have received it in error, please notify the sender immediately and destroy the transmission. You must not copy, distribute or take any action in reliance on it.

BEWARE OF CYBER-CRIME: Our banking details will not change during the course of a transaction. Should you receive a notification which advises a change in our bank account details, it may be fraudulent and you should notify Montagu Evans who will advise you accordingly.

Montagu Evans LLP is a limited liability partnership registered in England and Wales. Registered number OC312072. A list of members' names is available for inspection at the registered office 70 St Mary Axe, London EC3A 8BE.

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="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Brian"/>	<input type="text" value="Dylan"/>
Last Name	<input type="text" value="Kelly"/>	<input type="text" value="Chaplin"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Planning Consultant"/>
Organisation (where relevant)	<input type="text" value="abrdr"/>	<input type="text" value="Montagu Evans"/>
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"/>
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" value="REDACTED"/>	<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

☐

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.

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 refer to the submitted letter of representations dated 20 September 2024, prepared by Montagu Evans LLP on behalf of abrdn.

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

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

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

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

☐

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

☐

YES

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

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

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

Please refer to the submitted letter of representations dated 20 September 2024, prepared by Montagu Evans LLP on behalf of abrdn. abrdn are a principal landowner at the adopted strategic site allocation S01 and emerging strategic site allocation N17.SA1 and therefore request to participate in any Local Plan hearing sessions.

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 20th September 2024

PD13651/JS/DC

Ellie Kuper Thomas
Planning Policy – Local Plan Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

20 September 2024

Dear Ellie

**PUBLIC CONSULTATION – NEWHAM DRAFT SUBMISSION LOCAL PLAN (REGULATION 19)
REPRESENTATIONS ON BEHALF OF ABRDN**

We write on behalf of our client abrdn as a key landowner at Gallions Reach / Beckton Riverside in response to the Newham Draft Submission Local Plan (Regulation 19) consultation. This letter has been submitted as part of the formal consultation process. All comments have also been submitted by Montagu Evans on behalf of abrdn using the Council's Regulation 19 Response Form.

The purpose of the consultation document is to set out the Council's vision, objectives, spatial strategy and planning policy framework which the Council will address the challenges and makes the most of opportunities which face Newham now and in the future. The Regulation 19 consultation document is informed by the responses received on the Issues and Options consultation held at the end of 2021, the Draft Local Plan (Regulation 18) consultation in early 2022, the evidence base documents, emerging Council and Regional Strategies and area specific guidance including the Royal Docks and Beckton Riverside Opportunity Area Planning Framework ("OAPF").

In the interest of ensuring the Local Plan realises the significant potential presented by Gallions Reach and Beckton Riverside, abrdn wishes to highlight a number of areas where the Regulation 19 Draft Submission Local Plan policy as drafted should be amended to provide the appropriate policy framework for development and investment to come forward. In particular, abrdn wants to reach agreement with the London Borough of Newham ("LBN") about how appropriate policy wording can be included in the plan for the asset management of the Gallions Reach Shopping Park ("GRSP") before significant development can take place.

abrdn requests to meet with the LB Newham Planning Policy team at the earliest opportunity to discuss the next steps for this critical Neighbourhood Policy allocation prior to the submission of the Draft Local Plan for examination.

The following representations are broken down into two parts focusing upon Gallions Reach / Beckton Riverside including Gallions Reach Shopping Park:

- Asset Management
- Redevelopment

Context

Gallions Reach is identified in the adopted Local Plan as part of a wider site allocation for a significant new urban development, which includes a new Major Town Centre around the existing Shopping Park (Strategic Site S01). The adopted Local Plan states (para 6.64) that any changes in floorspace should be comprehensively masterplanned as part of wider changes to retail, residential and other employment, transport and utilities development in the area.

In accordance with Policy S01 the new neighbourhood should include new Strategic Infrastructure including a new station and wider transport hub. That is entirely dependent on the delivery of the DLR extension from the existing Gallions Reach station to Beckton Riverside and thereafter to Thamesmead via a tunnel crossing.

abrdn is working with St William, TfL and LBN to prepare the Strategic Business Case for this extension of the DLR to Beckton Riverside and Thamesmead. A critical element of this case is to demonstrate that the planning framework is in place to enable development to come forward at the Site at the appropriate time to create the funding to deliver new infrastructure and ensure the community is there to support it. This is dual purpose because both obligations resulting from development support the funding case, as does the revenue stream resulting from development and the DLR. One of the key principles is that all developments in some way combine to support the business case for Central Government Funding

It is also important that the new Local Plan enables the existing GRSP to function, adapt and thrive whilst also providing an appropriate framework for new development, infrastructure and investment to come forward in a timely manner. The ongoing successful operation of the park supporting existing retailers, attracting new ones and also creating new stores and restaurants is essential to providing a platform for the moment when a new town centre can be delivered. Retailers and the general market will have more confidence committing to a new town centre where there is an existing established centre.

ASSET MANAGEMENT

Draft Policy HS1 requires development for the provision of main town centre uses within N17.SA1 Beckton Riverside to be accompanied by masterplanning of the new town centre.

Whilst abrdn are supportive of the new infrastructure intervention of an extended DLR; it must be acknowledged that uncertainty always surrounds the delivery of such major interventions, this also applies to the potential delivery of the DLR extension. The reality is that such transport infrastructure may never come forward, it is impractical to require all new development within the N17.SA1 site allocation to be accompanied and informed by masterplanning of the new town centre when the triggers (set out later in this letter) do not allow for the delivery of the new town centre until the DLR construction contract has been let or funding is secured for a similarly transformative public transport intervention. There are examples where Government funding for major infrastructure projects has been removed despite having significant costs already committed, the timing of confidence in delivery remains an ongoing risk. There are clear inconsistencies with this draft policy and the triggers for the town centre delivery in N17.SA1, we therefore consider that this part of Draft Policy is unsound.

It is essential to abrdn that the proposed new Local Plan incorporates a policy framework which is flexible and recognises the critical importance of maintaining the ongoing asset management of Gallions Reach Shopping Park, to secure its commercial viability and function until comprehensive development can come forward in an appropriate manner. There should not be an 'in principle' objection in policy to any asset management which does not prejudice the delivery of the new Town Centre.

Gallions Reach Shopping Park is the largest shopping park in East London offering a wide range of non-bulky shopping opportunities. It acts as both a strategic shopping destination as well as being one which serves the local resident population. Various asset management applications have been permitted which expressly consider the relationship between GRSP and the nearby established town and district centres in terms of both impact and sequential testing of sites. On both tests, LBN has agreed that Gallions Reach Shopping Park does not fail those tests. This reflects the character, role and capacity of those town and district centres.

abrdn would not wish to see any restriction on the mix of uses supported at the existing Shopping Park, which should include leisure and restaurant uses. It was permitted as an 'open' shopping park from the outset and is not a bulky park which has incrementally changed its character over time. These uses will maintain activity and support the ongoing function of the Site. abrdn considers that such acknowledgement is crucial in the Local Plan and wishes to engage in an open discussion with LBN about how this position can be recognised in policy

During the future transition and creation of a new Town Centre, mixed commercial uses will be a critical part of the new town centre to provide a sense of place, ground level activation and support the local community. The policy as drafted should be flexible to support mixed commercial uses.

Unlike the nearby town centres, GRSP accommodates a significant number of retailers who would form the backbone of a future successful town centre. These retailers need to be supported because they are serving an important role for Newham's residents.

There needs to be a different approach in policy to provide a positive framework for successfully managing GRSP rather than the current approach of seeking to refuse every application for additional new build floorspace on the basis that asset management will in some way prejudice the policy objective to deliver a new town centre.

Supporting the asset management of GRSP is more likely to deliver that town centre because there will be an opportunity to work with existing and new retail businesses to accommodate them in that new place in a geography which they trade in and understand. That retail support is one of the key building blocks for abrdn delivering the new town centre.

REDEVELOPMENT OF BECKTON RIVERSIDE

Key principles in the Local Plan

1) 15-minute neighbourhood

abrdn continues to support the Council's proposed spatial strategy (BFN1), underpinned by the 15-minute neighbourhood concept, to provide an accessible and inclusive neighbourhood for all residents and to distribute the benefits of growth. This is consistent with the way GRSP currently trades – serving local residents as well as the strategic shopping role it also plays.

2) Consistent approach to masterplanning – not being applied

abrdn notes the requirements set out within the proposed spatial strategy (BFN2) for major applications and applications on site allocations to undertake co-designed site masterplanning, through engagement with different stakeholders. This supports the aspirations of the adopted Newham Local Plan, in particular Spatial Policy S1 for the comprehensive development and masterplanning of strategic sites.

We are aware of pre-application discussions for the proposed redevelopment of approximately 12 hectares of land comprising the eastern portion of the former Beckton Gasworks for substantial mixed-use development including 2,800 dwellings and 8,000 sqm of non-residential floorspace. A response to the EIA scoping request (ref. 23/02472/SCOPE) was issued on 9 April 2024, we understand that the submission of a planning application has followed (yet to be validated).

abrdn would like to put it on record that they were not involved with the masterplanning of or consulted upon as part of the emerging proposals set out above. We consider that this is contrary to Policy S1 of the Newham Local Plan and draft policy BFN2 of the Draft Submission Local Plan given that abrdn are considered to be a major landowner of the Strategic Site N17.SA1 along with the applicant St William. In contrast, this was one of the principal reasons for the refusal of application reference 23/00319/FUL because LBN considered the proposals in that case failed to demonstrate that the provision of new floorspace would not prejudice the aspirations of the site allocation in part due to a lack of justification of appropriate masterplanning in the context of the wider redevelopment aspirations of the strategic site. In that case, the proposals were considered to fail in meeting the expectations of adopted Policy S1 (the aspirations of which are retained in draft Policy BFN2) and Policy INF5 because they did not appropriately demonstrate through coordination with private and stakeholders and comprehensive development design that the proposals had been considered as part of the indicative wider comprehensive masterplan.

In light of the above, abrdn questions whether the application of adopted Policy S1 and draft Policy BFN2 is being applied consistently by LBN and if not whether it should continue to be part of policy going forward. If this policy is applied, then LBN should not have engaged in the pre-application process because there would have been an in-principle conflict with this requirement for joint masterplanning which has not been applied.

The proposed core policies in respect of design, tall buildings, high street and community uses, night-time economy, open space and connectivity are all supported and would be applied at Gallions Reach / Beckton Riverside (N17.SA1). abrdn proposes that these core policies provide a sufficient and appropriate framework to ensure that LBN's objectives for the development of Beckton Riverside are met.

This is because there has been a material change in circumstances compared with previous versions of the plan. That change is the future location of Beckton Riverside DLR station is now essentially fixed with a single preferred option agreed upon. This is because the alignment of the DLR, where the crossing under the Thames will be located and the geometry of the tracks is now essentially fixed through the engineering feasibility work that has been undertaken by the jointly commissioned team. With this fix on the station location and track alignment there can be no uncertainty that development on GRSP would prejudice the delivery of that key component. We propose that the N17.SA1 Beckton Riverside site allocation explicitly references that the location of the new proposed future DLR station and track alignment has now been fixed within the 'Development Principles' section at pages 593-596.

The future location of the station makes it clear that the southern end of GRSP closest to Armada Way will be closest to the new transport node if delivered. It is helpful that Armada Way also provides bus access to aid public transport accessibility and a future interchange.

abrdn supports the Council's assessment of the scale and type of centre designation in the Town Centres hierarchy. The Site has been identified as a location for a new Town Centre (in line with the London Plan Policy SD7 (2021)).

abrdn is also supportive of the inclusion of Gallions Reach as a strategic Neighbourhood Policy. abrdn notes that the Regulation 19 Plan and its Policies Map provides further clarity on the height parameters at the various parts of the Beckton Riverside site and welcomes that at the northern part of the site (including Gallions Reach Shopping Park) building heights

should range between 21-32m (7-10 storeys) with taller elements up to 50m (16 storeys) in locations near the new town centre and DLR station now its location is known.

Further clarification should be provided within the draft policy in respect of potential quantum of development (in terms of unit numbers), retail floorspace, housing mix and the more detailed distribution of land uses most notably the inconsistencies between the Draft Submission Local Plan and OAPF relating to the provision of green space and industrial buffering at GRSP. It is unclear how these Regulation 19 Neighbourhood Policies will be used to maximise the development potential of the site without delaying delivery through layers of policy, masterplanning and phasing.

Policy N17: Gallions Reach - Site Allocation N17.SA1 (Beckton Riverside)

The policy as currently drafted identifies a broad vision for the site, with 21 separate vision principles. There are two indicative development maps and three pages of policy which set out the Council's thoughts on development principles, design principles, infrastructure requirements and phasing for the site.

Subject to viability (please also refer to representations on Green Space and Industrial Buffering at the end of this letter), abrdn supports the overall vision to transform Gallions Reach into a new neighbourhood community with a new DLR line and station at the heart of the Town Centre, homes, employment, public transport, green space, community and cultural facilities. We do not comment upon all 21 of the vision principles, however abrdn supports the principle of integrating and protecting heritage assets, improving Armada Way, enhancing walking, cycling and public transport and public access to green and blue spaces. The vision as identified should be flexible to enable the development to come forward through appropriate masterplanning following detailed assessment of the site opportunities and constraints.

1) No significant development

abrdn notes that the wording of the trigger preventing transformative development and the associated development principles at the northern section of the site has been amended to remove reference to funding for a new DLR station, instead stating:

"Until the DLR construction contract is let or a similarly transformative (as confirmed by Transport for London) public transport intervention has confirmed funding"

The draft policy goes on to state that:

"...transformative development should only occur at the southern section of the site within easy walking distance of Gallions Reach DLR station", and that:

"...significant development and redesign of Gallions Reach Retail Park should not occur". (our emphasis)

Once the DLR construction contract is let or a similarly transformative public transport intervention has confirmed funding, the draft policy states that:

"...transformative development activity on the remainder of the site can commence, of a scale which reflects the improved transport access" and that:

"a new town centre should be delivered, consistent with a district centre designation"

2) Criteria for non-significant development

If *'significant development and redesign of Gallions Reach Shopping Park should not occur'* there should be a clear statement in policy – positively – of what can be categorised as non-significant development. This serves the purpose of agreeing what can and cannot be brought forward and provides some exemptions allowing non-significant development which is not required to adhere to the need for joint masterplanning.

Our suggestion is that a set of criteria should be inserted as part of the wording of N17.SA1 Beckton Riverside site allocation, at the 'Phasing and implementation' section on page 596. It should include a set of criteria which defines non-significant development in relation to GRSP including the Phase 2 land to the immediate southeast of the existing Shopping Park, as follows:

- Any retail or other asset management within the envelope of the existing terraces and pods;
- Mezzanine applications/ reconfiguring dividing walls etc which will be subject to the usual retail and leisure policy tests;
- Ancillary restaurant/pod applications which will be subject to the usual retail and leisure policy tests; and
- Applications for new retail warehouse stores driven by occupier demand via relocations or new retail businesses seeking to be accommodated at GRSP (once again subject to usual retail and leisure policy tests).

Any new retail warehousing would follow the operation of the existing retail terraces and as such would not prejudice the redevelopment of the strategic site should it come forward. As set out above and below, it is essential that the asset management of the Shopping Park and abrdn's landownership is not blighted by the potential for a major transport intervention to be delivered, the delivery of which remains an ongoing risk and will do so until construction works near completion.

abrdn's view is that 'significant' could also be given a definition in the context of the N17.SA1 Beckton Riverside site allocation. For example, abrdn's view is that significant could include an application for residential above retail which by its nature would be more difficult and less sustainable to redevelop as part of a 'transformative' development of the park. abrdn would like to discuss with LBN how this can be defined.

This approach would avoid the untenable position at present where any asset management application for new floorspace in a new building is by its nature unacceptable.

3) DLR project trigger

If and when the DLR construction contract is let (as is currently drafted) then the presumption against significant development and redesign would fall away.

abrdn request further clarification as to what constitutes a *"similarly transformative (as confirmed by Transport for London) public transport intervention"*, including what this might look like, any associated timescales for delivery and why this has now been included within the draft policy.

4) Criteria for significant development if DLR does not progress

What has become clear with the DLR extension project is that there is no firm timetable and no certainty about funding to its completion.

In these circumstances, abrdn requests that criteria are agreed and set in policy which would trigger discussions for significant development of GRSP, but which would be of a smaller scale than the 'transformative' scale sought to be captured by the current drafting and at appropriate locations. This would be a 'medium term' position.

These criteria would cover:

- the construction contract not being let;
- Funding being withdrawn/ being insufficient to allow the DLR feasibility to progress;
- Withdrawal of political support from the GLA/TfL or LBN;
- The DLR business case showing that the DLR scheme is unfundable;
- Other criteria to be defined.

It is essential that any future Local Plan policy enables some development to come forward at the northern part of the site in advance of a DLR construction contract being let or funding is secured for a similarly transformative public transport intervention. The DLR Business Case is strengthened substantially by the ability for early delivery on the site(s) of all major landowners before the DLR proceeds. abrdn is aware that having a supportive planning policy and outline planning permission in place will demonstrate commitment of the Council and developers as discussions relating to the DLR extension continue to progress. It is essential to the current business case that housing is delivered and functional at the point the DLR opens – the prevention of developing coming forward at the northern part of the strategic site until the DLR construction contract is let poses a significant risk to the business case. The policy should therefore be amended to reflect joint working and allow for an early phase of delivery before any DLR construction contract is let or funding is secured for a similarly transformative public transport intervention.

The development of this site should be seen in phases, to maximise the chance of delivery, viability of appropriate infrastructure and funding support. This would comprise an 'early phase' delivery which is not predicated on a DLR construction contract being let, and then a broader masterplan which is likely to split across multiple phases but enables development before the DLR construction is complete, and final phases once the infrastructure is in place.

Height and Design Principles

abrdn is supportive of the Gallions Reach Tall Building Zone (Draft Policy D4), including that Gallions Reach Shopping Park and the parcel of land to its southeast has been designated as being able to accommodate maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys).

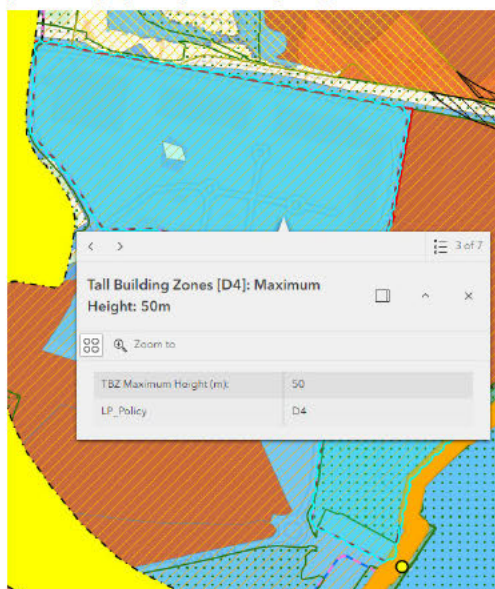


Figure 1: GRSP Tall Building Zone (Up to 50m)

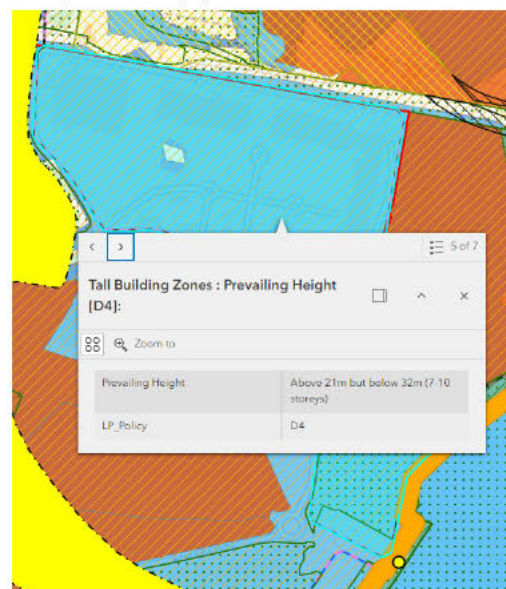


Figure 2: GRSP Tall Building Zone (Prevailing heights of 21m-32m)

As currently drafted, the proposed design principles set out a range of indicative building heights which are dependent upon the DLR construction being let or until a similarly transformative public transport intervention has confirmed funding. Whilst abrdn is supportive of the Tall Building Zone designation, as set out above, the trigger for allowing development of this scale cannot be predicated upon the DLR construction being let or until a similarly transformative public transport intervention has confirmed funding. Should there be any delays on the DLR decision making process and therefore the construction contract not being let for any reason (or other transport intervention) the policy as currently drafted does not allow for any phases of development to proceed at the northern part of the site and in such an instance no range of indicative building heights are applied. abrdn consider that there is the opportunity to identify a suitable area for early 'significant' but not 'transformative' development at a suitable location which would contribute towards the funding and appetite for the DLR extension project. This 'suitable area' (likely to be near to the proposed town centre / DLR station) would allow some development of increased density. abrdn would like to discuss with LBN how this could be defined in plan form.

The proposed vision for N17 includes a number of design principles to encourage improved connectivity between sites, improved cycling and walking and active access to green space and the River Thames. abrdn supports these principles in the vision, to be developed through appropriate masterplanning and design guidance but this should be clarified as to only be required with significant or transformative development. In particular, improvements to Armada Way are critical to the success of the proposed new community. abrdn wish to reiterate these improvements to Armada Way should not restrict the continued function of the existing Shopping Park.

The policy identifies a requirement for a new community development to provide bicycle parking and e-bike charging as well as improvements to bus services. Similarly, we would support the principle of reducing car parking across the site in combination with these other sustainable public transport initiatives. However, any such requirements should be appropriately phased for the masterplan area as a whole, to ensure the continued and co-existing operation of GRSP (an assumption of the DLR business case) which given its wider catchment area when compared to other nearby town centres will continue in part to be used by car borne customers as it does not have the highly localised catchments of other new town, district and local centres.

New Town Centre

The development of a new Town Centre – to meet District level as defined in the London Plan is important and should be carefully planned subject to demand at the appropriate time. abrdn supports the District level town centre designation, which subject to demand could expand to a Major centre designation in the future and notes that this designation suggests that emerging policy recognises the risk of no DLR (or a similarly transformative public transport intervention) coming forward. As above, this should therefore be reflected in policy to allow the ongoing unhindered asset management of GRSP in such an instance that the public transport infrastructure is not delivered.

The new Town Centre should encourage a mix of uses, to meet local catchment needs for retail, leisure, services and community uses. Beckton Riverside is currently identified as a 'Future Major Town Centre' in the London Plan Town Centre Network Table A1.1. This reflects that Gallions Reach Shopping Park operates as a strategic shopping destination overlapping the catchment areas of both district and local centres in the Borough, as reflected in the Policy. The Shopping Park retains that unique ability to serve other Newham communities. The London Plan should be the appropriate way of changing the designation of centres in the town centre hierarchy, not the Local Plan which should be consistent with it.

abrdn would like further clarity on the exact location of the proposed new town centre. When considering the maps found within both the Draft Submission Local Plan and the Royal Docks and Beckton Riverside OAPF, due to inconsistencies

across both documents it is currently unclear as to the proposed location of the new town centre. For the avoidance of doubt, the new town centre should be appropriately positioned for the new public transport infrastructure. This should be in the southern part of GRSP closest to Armada Way as is indicated on figures 1.23 and 2.29 of the OAPF – the indicative location shown on Figure 3 below (Newham Draft Submission Local Plan Interactive Policies Map) and at Figure 4 below should be repositioned to the northeast on abrdn owned land to ensure the appropriate delivery of the town centre.

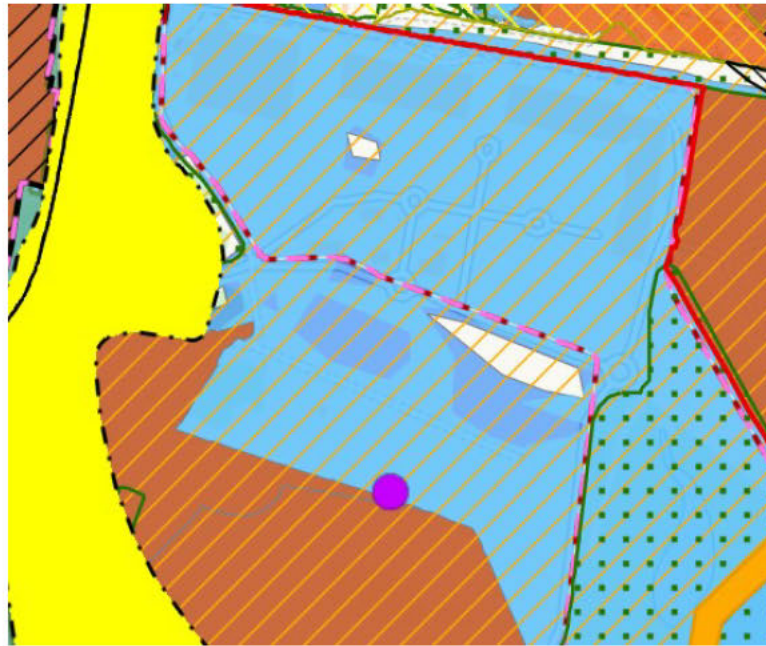


Figure 3: Indicative location of new town centre (purple dot) in Interactive Policies Map of Draft Submission Local Plan

As set out above, the delivery of the New Town should recognise the critical importance of maintaining the ongoing asset management of Gallions Reach Shopping Park, to secure its commercial viability and function until comprehensive development comes forward in an appropriate manner. Given the realities and timescales associated with bringing forward large scale transformative development such as this there should not be an 'in principle' objection in policy to asset management which does not prejudice the delivery of the new Town Centre.

Green Space and Industrial Buffering

abrdn supports the principle of providing opportunities for green space and industrial buffering, as shown at Figure 4 below. However, abrdn consider that the extent of the proposed opportunity for green space and industrial is too large, most notably at GRSP.

abrdn notes this area encompasses a significant portion of the Tall Building Zone (maximum building heights of 50m (16 storeys) and prevailing heights of above 21m but below 32m (7-10 storeys)) and that the extent of green space and industrial buffering currently proposed would severely impact the quantum of development at the strategic development. This development is key to funding the DLR extension.

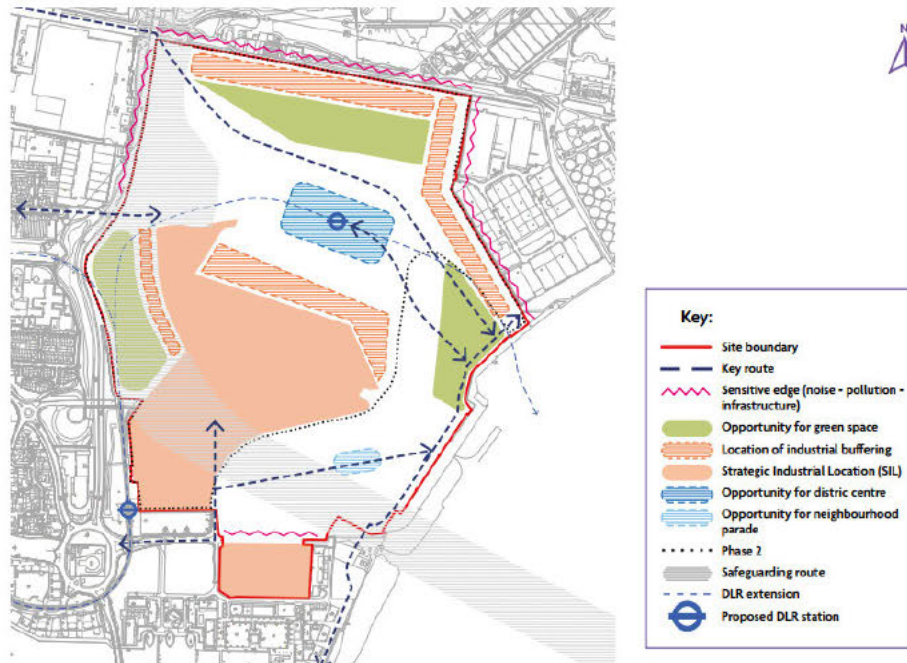


Figure 4: N17.SA1 Beckton Riverside indicative proposals map

In light of this, abrdn proposes that the extent of the opportunity for industrial buffering and green space is reduced – especially given that any plots that come forward will each be required to meet their own environmental and biodiversity net gain requirements. An area of land for the purposes of industrial buffering and green space to the extent currently proposed within the Draft Submission Local Plan would have a major impact on housing numbers, result in a severely limited development footprint and a potentially unviable masterplanned scheme at GRSP – thus potentially compromising the DLR business case. The extent and scale of opportunity for green space and industrial buffering should be more consistent with that proposed within the adopted Royal Docks and Beckton Riverside OAPF (Figure 2.29 of the OAPF), this is shown below at Figure 5.



Figure 5: Strategic Vision - Royal Docks and Beckton Riverside Beckton Riverside OAPF

SUMMARY

abrdn supports Neighbourhood Policy N17 and the inclusion of Site Allocation N17.SA1 within the Regulation 19 consultation document. As set out within these representations, there are a number of errors and further clarification required in the draft policy as currently prepared. In particular, the proposed approach to the phasing of development and the reliance upon the outcome of the DLR decision making process is not an appropriate or viable approach to the development of the strategic site.

It is also essential that emerging planning policy more explicitly supports the asset management of the existing Gallions Reach Shopping Park and provides a positive framework for its successful management so that it can continue to serve its important role to residents in Newham.

We consider that it is necessary to meet with the LBN Planning Policy team, we therefore strongly request a meeting at your earliest convenience to discuss this matter in further detail. abrdn also request to participate in any Local Plan hearing sessions at such a time the Draft Submission Local Plan is submitted for Examination.

Yours sincerely,

JULIAN STEPHENSON

PARTNER