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5th November 2025

**P08705 - Beckton Retail Park, Alpine Way, London E6 6LA
Newham Local Plan Examination Written Statement**

Rolfe Judd Planning have been appointed by LAMIT c/ CCLA Investment Management Ltd to advise on planning matters relating to their property at Beckton Retail Park.

We understand that LB Newham are undertaking the examination of the local plan between 2nd December 2025 and 5th February 2026. We have previously submitted representations to the Regulation 18 consultation in February 2023, the Regulation 19 consultation September 2024 and the call for sites consultation in November 2024.

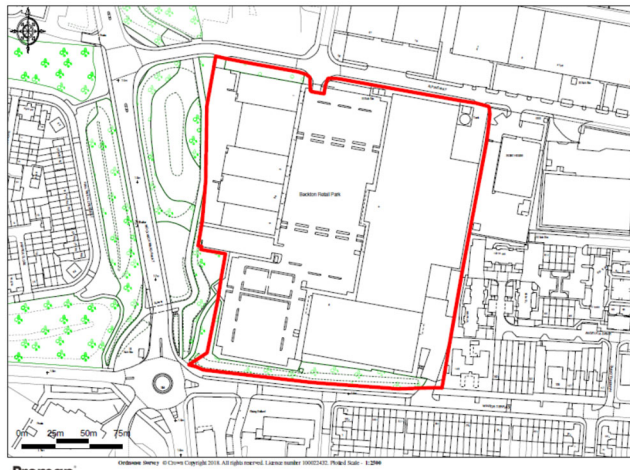
We are now writing in response to the scheduled examination and have also registered to speak at the following hearing sessions:

1. Wednesday 3rd December to discuss Policy D4: TBZ4 Beckton Tall Building Zone
2. Thursday 11 December 2025 to discuss Policy N11.SA3 Alpine Way

Background

Site Location

Beckton Retail Park is located in the south-east of Newham Borough, to the south of Alpine way, east of Woolwich Manor Way and north of Windsor Terrace.



Draft Development Proposals

The site was the subject of detailed discussions with London Borough of Newham in 2018 and early part of 2019 regarding a mixed-use development for commercial, employment and residential uses. Whilst the scheme design was not fully developed, the principles of the scheme were supported by Newham and the GLA. This support came partly from the site allocation S02 for the site for mixed use development as set out in the 2018 Local Plan. Due to the economic conditions at the time, a number of long dated occupational leases and then Covid, the scheme was not progressed any further.

A subsequent pre-application meeting was held with LB Newham on 2nd August 2024 with an updated proposal in response to the proposed re-insertion of the Alpine Way site allocation and market conditions improving. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the site in 2028.

The previous scheme prepared by Rolfe Judd Architecture (RJA) allows for the southern side of the site to be developed as Phase 1, and then the western side to be developed as Phase 2 and whilst this is occurring, the eastern side will remain trading as retail until lease expiry. This approach would allow for a phased delivery programme, with Phase 1 and 2 delivering approximately c.650 residential units over a 5 to 6 year build out programme. This would then allow for the implementation of the eastern Phase 3 and 4 delivering a further c.450 residential units and commercial/light industrial space.

The response to these proposals was generally positive, with the principles of a mixed-use scheme being considered acceptable on the basis that they accounted for the site allocation and draft local plan. The overall massing and layout were also considered appropriate for the site but the approach to providing a buffer between the proposed residential to the south of the site and SIL to the north and east would need to be carefully considered as the designs progress.

The outline proposals and feedback have been set in more detail below where relevant to the emerging policies in the Local Plan.

Representations

We would like to submit the following written statement to the examination in response to the following draft policies:

1. Support N11.SA3 Alpine Way, with proposals for updates and clarifications.
2. Support 'D4: TBZ4 Beckton Tall building zone' and the inclusion of the south-western corner of the Alpine Way site allocation within the 40m zone, but request that opportunities for additional height are explored on the site to maximise housing delivery.
3. Support Draft Policy N11: Beckton and clarify the range of uses acceptable under a mixed-use redevelopment proposal.

N11.SA3 Alpine Way

Draft Policy N11.SA3 (Alpine Way) promotes designates the site for development including residential and employment uses, as well as the provision of new open space. LAMIT c/ CCLA Investment Management Ltd support the re-insertion of the site allocation in the emerging Local Plan and have the following comments on the specifics of the allocation:

Quantum of Development

The draft site allocation does not specify any quantum of development, but the design work completed by RJA builds upon the work undertaken in 2018 to give an indication of the site capacity.

The proposed scale and density of the scheme have increased since 2018. This is partly due to issues such as second stairs and increased sustainability credentials, but also in response to the renewed NPPF focus to make efficient use of brownfield land. Issues related to cost of inflation and other viability factors affecting the building industry also require greater density be delivered to support viability.

The proposed increased density on this site would deliver around 1,100 homes for the borough. Draft policy H1: Meeting housing needs, has been amended to reflect the December 2024 NPPF housing targets, increasing from between 51,425 and 53,784 in the Regulation 19 local plan to 53,194 and 54,976 between 2023 and 2038. The N11.SA3 Alpine Way site could deliver approximately one third of Newham's annual housing delivery target if the reasonable maximum density is realised.

All levels of planning policy seek to ensure the effective use of land in order to meet the urgent need for new homes and other uses. Policy places a priority on making as much use as possible of previously developed or brownfield land.

The Government has been clear in its objective to deliver 1.5 million new homes over the next parliamentary term as part of its Plan for Change. National, strategic and local levels of planning policy are all clear in their support for the redevelopment of brownfield sites such as Alpine Way. This was echoed by the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government in her first Ministerial Statement on 30th July 2024 which stated:

"The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes..."

This strong support for the redevelopment of brownfield sites was enshrined in the December 2024 revisions to the NPPF. Paragraph 125c states planning policies and decisions should:

“...give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”

We therefore request that the site capacity for allocation N11.SA3 is updated to reflect the level of housing that is deliverable in line with government policy and the London Plan.

Strategic Industrial Location Buffer Zone

The draft allocation states that industrial and employment floorspace should be located in the northeast of the site to provide a buffer to the Strategic Industrial Location (SIL). Non-residential, stacked industrial buildings are considered the most appropriate typology for this buffer. The site's design and layout should include public realm enhancements and avoid orienting habitable rooms and amenity spaces toward industrial uses.

The most recent proposals suggest integrating residential areas with industrial zones using a hybrid scheme, similar to a previous example from 2018. In that project, a single strip of workspace was placed above a large ground-floor and mezzanine retail unit to serve as a buffer, allowing residential development in the remaining parts of the block. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units were designed in small clusters. These units could either function as industrial spaces or be converted back to residential use, depending on future needs.

An alternative approach would involve replacing large retail units with townhouses or flats that back directly onto commercial B1 units. This would create a buffer where the commercial units face the industrial area, while the residential units face south toward the main site, forming a street and accommodating future residential phases. This approach has been applied elsewhere in London, including a site where flexible B1 and light industrial B1c units have been designed and built, with future residential units facing away with complete and successful separation of uses.

This flexibility would allow for residential development adjacent to industrial zones while maintaining compatibility with the industrial environment. It also maximizes residential use in a corner of the site without compromising the adjacent SIL area. As the project progresses, the design will evolve to address safety and dual-aspect requirements.

This aligns with the 'Agent of Change' principle set out by London Plan Policy D13, which aims to ensure that existing industrial operations are not disrupted by introducing new residential development.

Overall, we recognize the need to protect future residents' amenities while avoiding any compromise to the SIL's function, but there are several potentially acceptable solutions for introducing residential units into the industrial buffer zone, while maintaining compliance with London Plan Policy D13. We request that the site allocation be updated to acknowledge that residential uses within this buffer zone can be considered acceptable, provided that compliance with Policy D13 is achieved.

Building Heights

The draft allocation states that building heights should range between 9-21m (c.3-7 storeys) with taller buildings up to 32m (c.10 storeys) and 40m (c.13 storeys) to the west to add wayfinding and to mark the gateway to the site. Massing should step down towards the east-south of the site to sensitively integrate with the heritage assets.

The response to draft Policy D4: TBZ4 Beckton Tall Building Zone addresses building height on the Alpine Way site allocation.

Phasing and Implementation

New text has been introduced which states:

'Phasing of the site should take account of the likely requirement for water supply infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.'

We recognise that it will be necessary to ensure that any future development secures sufficient water supply infrastructure, however we object to the proposed wording which requires necessary infrastructure upgrades to be delivered ahead of the occupation of development. It may be the case that part of the development can be built and occupied prior to the water infrastructure upgrades being necessary. As worded the requirement is overly restrictive and may unnecessarily result in the delay of housing delivery.

We therefore request that the wording is updated as follows:

*'Phasing of the site should take account of the likely requirement for water supply infrastructure upgrades, through early engagement with Thames Water in order to ensure that any necessary infrastructure upgrades are delivered **at an appropriate point in the phased occupation of the proposed** ~~ahead of the occupation of~~ development.'*

Street Hierarchy

The draft allocation states that the design and layout of the site should establish a connected network of streets and spaces that connects to the existing street network and should create a street hierarchy, enhancing walking and cycling links north to south to Beckton Alp and enhancing pedestrian connectivity to East Beckton Town Centre and residential uses across Woolwich Manor Road to its west and Winsor Terrace to its south. The layout should also future proof east/west routes knitting to the urban fabric to the east of the site. Development should reinforce the legibility of the street hierarchy through appropriate scale and massing on primary and secondary streets, framing a central public space.

We recognize the importance of any future development on the Alpine Way site enhancing connectivity and reinforcing the existing street network. However, we are still in the early stages of developing a masterplan and have not yet determined the location of blocks within the site. Therefore, we request that the key for the site allocation is amended to read, 'Key site access points and indicative key routes'.

Development Delivery Timescale

The draft allocation states that scheme is likely to be delivered in the medium to long term. There is currently a mix of occupancy, and following a strategy of regearing of leases there is an ability to develop the site in 2028.

In summary, we support draft Policy N11.SA3, but request the following amendments:

1. Recognize that the site allocation has significant capacity to contribute to the Boroughs housing target through increasing density on a brown field site.
2. Allow for residential development within the buffer zone on the basis that London Plan Policy D13 Agent of Change is fully complied with.
3. The requirement to deliver sufficient water supply infrastructure is linked to an appropriate point in the occupation of the development rather than upon first occupation.
4. The key on page 544 of the draft Local Plan be amended to read, '*Key site access points and indicative key routes*'.

D4: TBZ4 Beckton Tall Building Zone

In our response to the Regulation 18 Local Plan consultation we proposed amending the policy map to extend the 40m zone of TBZ4 to include the south-western corner of Beckton Retail Park.

Draft Policy D4.TBZ4: (Tall buildings - Beckton Tall Building Zone) allows for limited taller building elements up to 32 meters (around 10 storeys) to mark key areas, such as the centre of the town. There is also provision for buildings up to 40 meters (approximately 13 storeys) near the Beckton DLR station, which includes the south-western corner of the Alpine Way site. LAMIT c/ CCLA Investment Management Ltd support the extension of the 40m zone to include Alpine Way.

We suggest that the Council is more ambitious in regard to the maximum height allocation. The design work carried out in 2018/2019 established that across the majority of the site articulated blocks between 4 and 10 storeys (c.32m) would be appropriate, however taller elements of between 12 and 15 storeys (c.46m) would be appropriate along the western boundary with Woolwich Manor Way, with a taller 15 to 18 storey (c.55m) cluster in the south-western corner of the site, adjacent to the Woolwich Manor Way/Winsor Terrace/Tollgate Road roundabout.

This approach to density and height is consistent with the London Plan. London Plan Policy GG2 (Making the best use of land) requires development proposals to prioritize the efficient use of land by enabling the development of brownfield sites. Proposals should explore the potential to intensify land use to support additional homes and workspaces, promoting higher density developments in locations accessible by public transport, walking, and cycling. A design-led approach should be applied to determine the optimal development capacity of sites, considering local context and community value.

The London Plan expands on these objectives to develop underutilised brownfield sites. Policy H1 'Increasing Housing Supply' requires Boroughs to '*optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity*'.

Policy D3 of the London Plan states that:

A - All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the Site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth...

B - Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

We therefore consider a height of around 20+ storeys to be appropriate for the south-west corner of the Alpine Way site. This increase would contribute to addressing the shortfall in housing and represent a suitable clustering of taller buildings, aligning with the N11.SA1 East Beckton Town Centre allocation. We strongly encourage the Council to consider increasing the height limit within the 40m zone and extending this along the western boundary of the site.

N11 Beckton

This policy sets out the neighbourhood profile and sets out a vision for Beckton.

Part 8 of the policy supports the intensification of existing retail and leisure parks for industrial, logistics and distribution and related functions as part of mixed-use development. We support the principle of introducing mixed-use development on existing retail parts, but request that this wording is adjusted to acknowledge that mixed-use development can include residential, retail and commercial elements, in addition to the industrial, logistics and distribution uses referenced by policy.

Conclusions

In conclusion, LAMIT c/ CCLA Investment Management Ltd welcome the inclusion of Site Allocation N11.SA3 (Alpine Way), designated for development including residential and employment uses, as well as the provision of new open space. We consider there to be significant capacity to deliver around 1,100 homes on this brownfield site to contribute to Borough housing targets. Given the encouragement in national planning guidance and through the London Plan we consider there to be an opportunity for a series of taller buildings than previously proposed and we encourage the Council to take a more ambitious in regard to the maximum height allocation.

We look forward to participating in the examination hearings.

Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited