

Planning Committee Report

London Thames Gateway Development Corporation

Emerging Planning Policy in the Lower Lea Valley: Newham Core Strategy – Submission Document

Report of the Director of Planning

1. Purpose of this report

- 1.1 This report sets out the proposed LTGDC response to the London Borough of Newham's Core Strategy Proposed Submission Draft which has been published for consultation. It is available to view on the Newham website:
<http://www.newham.gov.uk/Planning/LocalDevelopmentFramework/CoreStrategy.htm>
- 1.2 As the LTGDC does not have policy or plan making powers, it is essential that the interests of the Corporation are reflected wherever possible in emerging planning policy of constituent boroughs to assist in the delivery of the Development Corporation's objectives.
- 1.3 The LTGDC Planning Committee has responsibility for considering policy documents and providing LTGDC's formal response. The Core Strategy submission draft has not been reported to LTGDC's Board because there has not been an appropriate Board meeting to report to within the short six week consultation period.
- 1.4 A draft response to the consultation is attached at Appendix 1.

2. Recommendation

- 2.1 That the Committee **Agree** that the Director of Planning respond to the consultation with comments as set out in Appendix 1 and any additional comments made by members at the meeting.

3. Background

- 3.1 A 'Choices for the Core Strategy' document was published for consultation in November 2010. Members considered a report on the Choices document and agreed an LTGDC response at their meeting on 9th December 2010.

- 3.2 This formal consultation stage, on the proposed submission draft is part of the preparation for the Core Strategy to be submitted for independent examination. The Examination in Public is likely to take place in Autumn 2011. Examination is undertaken on the basis of matters of soundness and legal compliance - broadly this means that the plan must be justified and effective, as well as having followed due process. Given this, Newham have asked that representations focus on these matters, and have structured the online response form accordingly.
- 3.3 Newham ask that consultees state whether they support or object to particular policies (including their reasoned justification, implementation details etc) and other sections (e.g. monitoring), and if they object, state on what grounds, and suggest amendments to address this. An explanation of the tests of soundness and legal compliance can be found in Planning Policy Statement 12: Local Spatial Planning.
- 3.4 This report explains how the Newham Core Strategy submission draft is structured and the main principles it follows.
- 3.5 This report then considers how the Newham Core Strategy submission draft reflects the comments made by LTGDC on the 'Choices' document in December 2010. It also considers whether there are any issues of legal compliance or soundness that LTGDC need to take further and object to.

4. Newham Core Strategy Proposed Submission Draft: structure and main principles

- 4.1 The document is essentially divided into two sections. Section A - Newham Today, sets out the role of the Core Strategy, a spatial portrait of Newham in 2011, Challenges and Opportunities, and the Context for Newham's Spatial Development. It is considered that section A overall provides a good summary of the Borough.
- 4.2 Section B Newham 2027 sets out a Spatial Vision for Newham. Spatial Policies S1 – S6 are then set out. These are S1 Spatial Strategy, S2 Stratford and West Ham, S3 Royal Docks, S4 Canning Town and Custom House, S5 Beckton and S6 Urban Newham. These policies all have an objective, policy and reasoned justification. The objective of S1 Spatial Strategy is to focus major development opportunities in the Arc of Opportunity, which covers the Lower Lea Valley and Royal Docks. Policies S1, S2, S3 and S4 are of most relevance for LTGDC. Strategic sites are designated as part of policy S1. Policies S2-S6 set out the objectives and policy for each of the areas, with useful plans that show the main policy designations applying in each area.
- 4.3 After the Spatial Policies are core policies for Successful Places, Jobs Business and Skills, Homes, Sustainability and Climate Change, Infrastructure .
- 4.4 There are 5 appendices to the document. The main ones of importance for LTGDC are AP1 Strategic Site Schedule and Designations (a table that

should be read alongside the Spatial Policies) and AP3 the Infrastructure Delivery Plan.

5. Previous LTGDC comments and how they have been addressed

5.1 The following concerns were highlighted in the December 2010 committee report. How they have been addressed is discussed below.

5.2 Key Diagram

5.3 Mapping has improved since the 'choices' stage of the Core Strategy. The borough is now shown in the context of the boroughs around it. Utilities infrastructure is better shown. Transport infrastructure such as Crossrail and the Thames Crossings are better indicated. New rejuvenated communities, especially around the Crossrail Stations are better shown. It is noted that the Silvertown tunnel and the cable car are indicated as one proposal, T5. Neither Dagenham Dock DLR extension nor the Barking to Royal Docks transit, are shown well on the diagram. It would be more helpful if indicative routes for these were shown. This is because significant work has been done on both these proposals and preferred alignments have been identified and agreed with stakeholders. Both projects are also identified in the East London Transport Plan, recently published by TfL. Lea River Park is also not shown well on the Key Diagram. Twelvetreets Crescent Gas works has not been allocated as a new open space on the key diagram. Officers understand that a proposals map will be submitted alongside the Core Strategy, and it is anticipated that all of the above will be shown on the proposals map.

Infrastructure needs

5.4 The Strategy now includes 9 policies on Infrastructure in the Core Policies section and an Infrastructure Delivery Plan at Appendix 3. There are also references throughout the document to the need for development to ensure that infrastructure is provided as part of development proposals. There are also references to the forthcoming suite of documents including site allocations document and Supplementary Planning Documents for strategic sites which will provide more guidance on what infrastructure will be required as part of development.

Delivery and Planning Obligations or Community Infrastructure Levy

5.5 There is now an Infrastructure Delivery policy (INF9) in the document. Policy states that priorities for infrastructure will be set out in the infrastructure delivery plan, which will be updated annually. The text for the reasoned justification for INF9 notes that the LTGDC tariff will be operational in the borough until 2013. Newham are proposing to do more work on their CIL following confirmation of the Council's budget in March 2011.

Compulsory Purchase Powers

- 5.6 There is a brief reference to how the Council will make the best use of public assets by working with other public agencies including the use of Compulsory Purchase Powers and land assembly in the implementation section of policy S1 Spatial Strategy.

Regeneration and the Arc of Opportunity

- 5.7 The document is still more focussed on the 'Arc of Opportunity' rather than the regeneration of the Lower Lea Valley as a whole. There has been more text included, especially in Section A Newham Today which sets out what has already been achieved in the area in terms of ongoing regeneration. There is little in the document about the proposed Mayoral Development Corporation and the future role of LTGDC and LDA. There is more in this document than in the 'choices' document about the current roles of LTGDC and the LDA.

Priorities

- 5.8 There is little explicit about Priorities which picks up LTGDC's previous comment that development does not happen all at once, and that as the strategy now runs to 2027 priorities should be proposed for different time frames. However, it is implicit within many of the policies and within the site schedule and infrastructure delivery plan that development will happen over a long time frame, and that certain outcomes are dependent on resolution of other policy issues and development of other infrastructure. For example the proposed wharf consolidation policy, which is supported by LTGDC is partially dependent on the GLA review of protected wharves which is currently taking place, and this has implications for how much Strategic Industrial Land in Thameside West can be released at the current time. Similarly, the likelihood and programme for development of Thames Crossings at Silvertown and Beckton will impact on the regeneration of sites in Canning Town and Beckton where the impact on residential amenity of the new crossing may affect the suitability of sites for residential development.

Spatial Designations Schedule

- 5.9 Suggested comments on this are set out in Appendix 1.

6. General comments

- 6.1 The publication of this proposed submission draft Core Strategy document is welcomed, as it is an important milestone in development of Newham's LDF, which will set a clear planning policy for the borough. The document sets out relatively clearly a spatial portrait of Newham today (2011) and a vision for how it should be in 2027. The document also sets out a suitable policy framework for achieving that vision. Generally officers are supportive of the document as a whole, although there are a few specific policies which are worthy of comment as set out in appendix 1. It is not

considered that these are issues that affect the soundness or legal compliance of the document.

- 6.2 Generally, officers are supportive of the Strategic Sites identified, most of the site allocations proposed, and the approach to retention and consolidation of Strategic Industrial Land and employment land set out in the document. Clarification would be helpful however in relation to sites S10 Abbey Mills and S11 Parcelforce, as set out in Appendix 1, and the extent of SIL designation in that area as maps on page 22 and page 82 show different designations.
- 6.3 Officers suggested specific comments on Core Policies, Strategic Policies and Appendix 1 Strategic Site Schedule and Designations are set out in Appendix 1 to this report. It should be noted that officers consider it is not necessary for LTGDC to comment on all the policies and designations.

7. Next Steps

- 7.1 The Committee is asked to agree that the Director of Planning respond to the consultation with comments as attached at Appendix 1 and any additional comments made by members at the meeting.

Appendix 1 Suggested LTGDC response to Newham Core Strategy Submission draft consultation

Appendix 2 Strategic Site S22 Minoco

Appendix 3 Map of Strategic Sites (page 22 of Core Strategy)

Appendix 4 Map of Employment Land release (page 82 of Core Strategy)

Date: 2 March 2011

APPENDIX 1

Suggested LTGDC response to Newham Core Strategy Submission draft consultation

General Comments (suggested LTGDC response in *italic*)

The publication of this proposed submission draft Core Strategy document is welcomed by LTGDC, as it is an important milestone in development of Newham's LDF, which will set a clear planning policy for the borough. The document sets out relatively clearly a spatial portrait of Newham today (2011) and a vision for how it should be in 2027. The document also sets out a suitable policy framework for achieving that vision. Generally LTGDC are supportive of the document as a whole, although there are a few specific policies which are worthy of comment as set out below. LTGDC do not consider that these are issues that affect the soundness or legal compliance of the document.

Generally, LTGDC are supportive of the Strategic Sites identified, most of the site allocations proposed, and the approach to retention and consolidation of Strategic Industrial Land and employment land set out in the submission document. Clarification would be helpful however in relation to sites S10 Abbey Mills and S11 Parcellforce, as set out in our comments on those sites. It is also noted that maps on page 22 and page 82 show different designations. LTGDC understand that the map on page 82 is the most up to date and support this position.

Comments on Core Policies

J2 Providing for Effective Use of Employment Land

Although LTGDC do not object to the principle of the policy on release of employment land, LTGDC consider that it could be phrased better and in particular include a reference to residential amenity if new uses such as residential are introduced into existing employment areas. The policy should consider prioritising areas for release and avoid piecemeal, isolated residential schemes. A cross reference to policy S1 and statements regarding creation of mixed and balanced communities and provision of supporting infrastructure would be helpful. Text within Reasoned Justification does refer to avoiding piecemeal development, it may be helpful if this formed part of the policy.

H2 Affordable Housing

This policy aims to ensure 50% of the number of all new homes built over the plan period are affordable. Although it would be difficult to achieve this level of affordable housing in today's funding environment LTGDC recognise that this is an appropriate level of affordable housing for the borough to seek as a whole, on the basis of the evidence base supporting the Core Strategy. The policy also recognises that the policy may be challenging to meet in the early years. The policy for Canning Town, reflecting high levels of existing social housing, is for 65% market housing and 35% affordable.

Overall, LTGDC support the approach set out in policy H2.

H4 Protecting and reshaping the existing housing stock.

LTGDC support protection of existing housing stock and resisting conversions of existing family housing.

SC4 Biodiversity

LTGDC support the proposed SINC at Twelvetreets Crescent indicated on the 'Biodiversity in Newham' plan on page 103.

INF1 Strategic Transport

LTGDC welcome this policy and the support given to projects such as International trains calling at Stratford Station, safeguarded river crossings at West Silvertown and Gallions Reach, Extensions to the DLR from Gallions Reach to Dagenham Dock, East London Transit bus link from Barking to Canning Town via Beckton and the Royal Docks. LTGDC will support the Council in resisting proposals that would prejudice the construction envelope for the DLR extension unless a satisfactory alternative alignment is provided. LTGDC consider that the Gallions Reach crossing can be supported in its own right, and is not dependent on funding commitment to DLR.

The LTGDC has supported a review of the wharves at Thameside West for some years. LTGDC look forward to being involved in the future study to clarify the future provision of wharves in the area which will help bring forward the aspirations for the Royal Docks as set out in the Core Strategy.

INF2 Sustainable Transport

The reference to the Lea Valley Fatwalk in bullet point 3 should be amended to Lea River Park (also in Legend for section on S4 and text at S18). Reference to this important LTGDC project is welcomed.

INF4 – Local Heat and Power Networks

LTGDC assume the reference to LTGDC's heat network should be the Thames Gateway Heat Network. LTGDC support the use of a Local Development Order to help bring it forward.

INF5 – Town Centre Hierarchy and Network

The Policy talks about the "longer term aspiration for Gallions Reach Shopping Park to become a Major Centre serving the eastern edge of Newham and wider growth area, through re-configuration of its floorspace to incorporate a more rounded offer, and improved local connections and public transport links". The shopping park isn't designated as a retail centre in this plan period, but the justification talks about improvements to the odour nuisance that are being made through improvements to the sewage works and possibly residential being brought forward in the longer term. LTGDC support this approach, although it needs to be recognised that the timescale

for change will be influenced by the type of development that takes place on other significant sites nearby e.g. Gallions (Albert Basin) and National Grid land.

The implementation section of this policy confirms that changes to the Canning Town Town Centre boundary are being changed through this Core Strategy. This change is supported by LTGDC.

INF6 – Green Infrastructure

Reference should be provided to the creation of the Lea River Park, perhaps in the second bullet. The diagram on page 126 doesn't show the new Lea River Park and this should be updated.

INF 7 – Blue Ribbon Network

LTGDC consider that reference should be made in this policy to the Lea River Park and the strategic aspiration to link the Lea Valley Regional Park to the Thames.

INF 8 –Community Facilities

LTGDC welcome the further details on education programme set out in this section. Clearer advice could be provided on where new education facilities will be sought alongside development.

INF9 – infrastructure Delivery

LTGDC welcome the reference on page 133 to the LTGDC tariff for planning obligations.

Comments on Spatial Policies and Strategic Sites

S01 Stratford North

LTGDC support the proposed designation.

S02 Stratford Waterfront

LTGDC support the proposed designation.

S03 Olympic Quarter

LTGDC support the proposed designation, recognising that the future is uncertain until an end user for the stadium is confirmed and associated proposals come forward.

S04 Chobham Village

LTGDC support the proposed designation.

S05 Stratford Central

LTGDC support the proposed land use designation.

S06 Carpenters District

LTGDC consider reference to the improved connection and southern entrance to the station could be stronger and more explicit as integral to the transformation of the Carpenters Estate. It is clear the residents of an extensively redeveloped Carpenters Estate and those in other new residential schemes along the High Street would benefit considerably from the new entrance to Stratford Station.

S07 Sugar House Lane and Three Mills

LTGDC support this designation. The table of strategic sites should refer to the land use and design brief for this area, not just to the Stratford Metropolitan Masterplan.

S09 Pudding Mill Lane

LTGDC's comments about the extent of the site available for development as much is safeguarded for Crossrail have not been incorporated. Support de-designation from SIL, but LTGDC considers development should be employment led mixed use, with residential coming forward only in those areas where amenity issues are not significant. . These issues vary significantly across the area e.g. proximity to Crossrail and A12.

S10 Abbey Mills

LTGDC considered that the proposed designation for this site, especially in the spatial designations table should be clearer. LTGDC understand that the outcome of the public inquiry into enforcement action against the use of the site as a mosque is awaited. LTGDC also understand that Newham see scope for different uses in different parts of the site, therefore the policy should more clearly set out the area allocated for employment, residential and community uses. The map shown on page 82 of the strategy marks sites S10 and S11 as "Proposed release of Other Employment Land Designation" – this would seem contradictory to the text in the spatial designations table. LTGDC support a new local centre in the vicinity of West Ham station. It is also noted that maps on page 22 and page 82 show different designations. This should be clarified.

S11 – Parcellforce

In the Strategic Sites designation it is stated that this site has been allocated for employment led mixed use linked with the Cody Road industrial area. It is not clear from the table whether mixed use includes residential – the further information section of the table indicates that residential would be difficult to support at the moment given significant constraints (transport, access, gas holders). LTGDC agree that residential will be difficult to achieve satisfactorily and that employment use is more appropriate across much of the site. LTGDC understand that Newham consider that residential may be acceptable on some parts of the site, but not all because of amenity considerations. This should be more clearly set out in the policy and spatial designations table. The map shown on page 82 of the strategy marks sites S10 and S11 as "Proposed release of Other Employment Land Designation" – this would seem contradictory to the text in the spatial designations table. It is also

noted that maps on page 22 and page 82 show different designations. This should be clarified.

S12 – Crown Wharf / Bidder Street

In the Choices document choices were presented for site S12 Crown Wharf /Bidder Street. This site is not allocated in the proposed submission document. LTGDC previously supported removal of this site from the town centre boundary. LTGDC also commented that it may be appropriate to release the southern part of the site for employment led mixed use, but that the northern part of the area should be retained for employment use. Employment led mixed use would be more appropriate nearer the station and public transport, while retained employment use would be more appropriate and have agglomeration benefit in the north of the area, given the close proximity of Cody Road and Prologis business parks. LTGDC note that the northern part of the site is now retained as SIL on the map on page 82. However, from discussion with officers at Newham, officers understand that the site is no longer allocated as a strategic site in the core strategy, and the policy presumption would therefore be that it is retained as employment land. The site is removed from the town centre boundary.

LTGDC support the dedesignation of this site as a strategic site, and its removal from the town centre boundary. However the extent of SIL designation in the area needs to be clarified as maps on page 22 and page 82 show different designations.

S13 Manor Road

LTGDC support the proposed removal from the town centre designation. The text does not clarify the point regarding moving Manor Road to run alongside the railway, which LTGDC understand is a long term aspiration which would enable a better residential environment to be created on the site. The phasing on the spatial designations table should be changed from “medium” to “long” term as LTGDC understand there are proposals to use the site for retail sheds in the medium term.

S14 Canning Town Central

LTGDC support the proposed land use designations.

S15 Canning Town East

LTGDC support the proposed land use designations.

S16 Silvertown Way East

The text has been updated to reflect LTGDC's concern about amenity implications of Silvertown Crossing. Elsewhere in the document Newham express support for Silvertown Crossing as a route for business, public transport and cyclists but not private cars. Given that the crossing it to be paid for by tolls excluding cars this would not be feasible. LTGDC understand that this is a drafting error which will be corrected in the next version of the strategy.

LTGDC support a new all modes crossing at Silvertown.

S17 Silvertown Way West

LTGDC understand that proposals for high density residential are coming forward on this site. It would appear that the existing and proposed land use designation column and the indicative housing typology are in contradiction to each other.

S18 Limmo

LTGDC support the proposed land use designations.

S08 Thames Wharf

LTGDC support the release from SIL and the new DLR station.

S19 Gallions and S20 Ivax

LTGDC previously said that student housing could be promoted in this area. The submission draft of the Core Strategy is now saying that this site should be residential, with supporting open space and community facilities, to the south, with residential coming forward in the longer term to the north if major transport improvements come forward. It is clear that planning issues in this area are complicated and development of this site is in the medium to long term. LTGDC support the updating of the Albert Basin SPG to help plan for change in this area. LTGDC still consider that planning for this site should exploit its location near the university. There should also be a cross reference to potential inter relationships with longer term planning at Gallions Shopping Centre.

S21 Silvertown Quays

In accordance with LTGDC's previous comments, reference is made to leisure uses, hospitality and green industries as well as housing. This change is welcomed

S22 – Minoco –

LTGDC previously commented that the area east of Peruvian Wharf should be released from SIL and allocated for residential led mixed use. Newham are proposing to release the land east of Lyle Park, as shown on map attached at Appendix 2 . It is considered that this is acceptable, given elsewhere in the submission draft there is clear support for consolidation of wharves, and if this consolidation goes ahead then there would be opportunity over the longer term for the land up to Peruvian Wharf to be released from SIL. The spatial designations table should be updated to include information on forthcoming proposals given an application is expected in May and the existing planning permission will not be implemented.

T4 – East London Transit (Phase 2)

LTGDC consider that more explicit support could be given for this as a bus corridor between Barking and the Royal Docks and reference made to the work carried out by LTGDC and TfL. As far as TfL are concerned ELT Phase 2 no longer exists as a concept, so the title should be changed. Although funding has not yet been committed, the Core Strategy could be one of the documents that adds support to

the proposal and helps make the case for funding. As suggested above, it would be helpful for the key diagram and transport connections figures to include an indicative alignment for the route. This is because significant work has been done on the proposal and a preferred alignment identified and agreed with stakeholders. Both projects are also identified in the East London Transport Plan, recently published by TfL. LTGDC understand that a proposals map will also be submitted with the Core Strategy and request that the preferred alignment for the Barking to Royal Docks bus corridor and the DLR to Dagenham Dock is marked on the proposals map.

T5 – a) Silver town Crossing safeguarding b) Cable car crossing

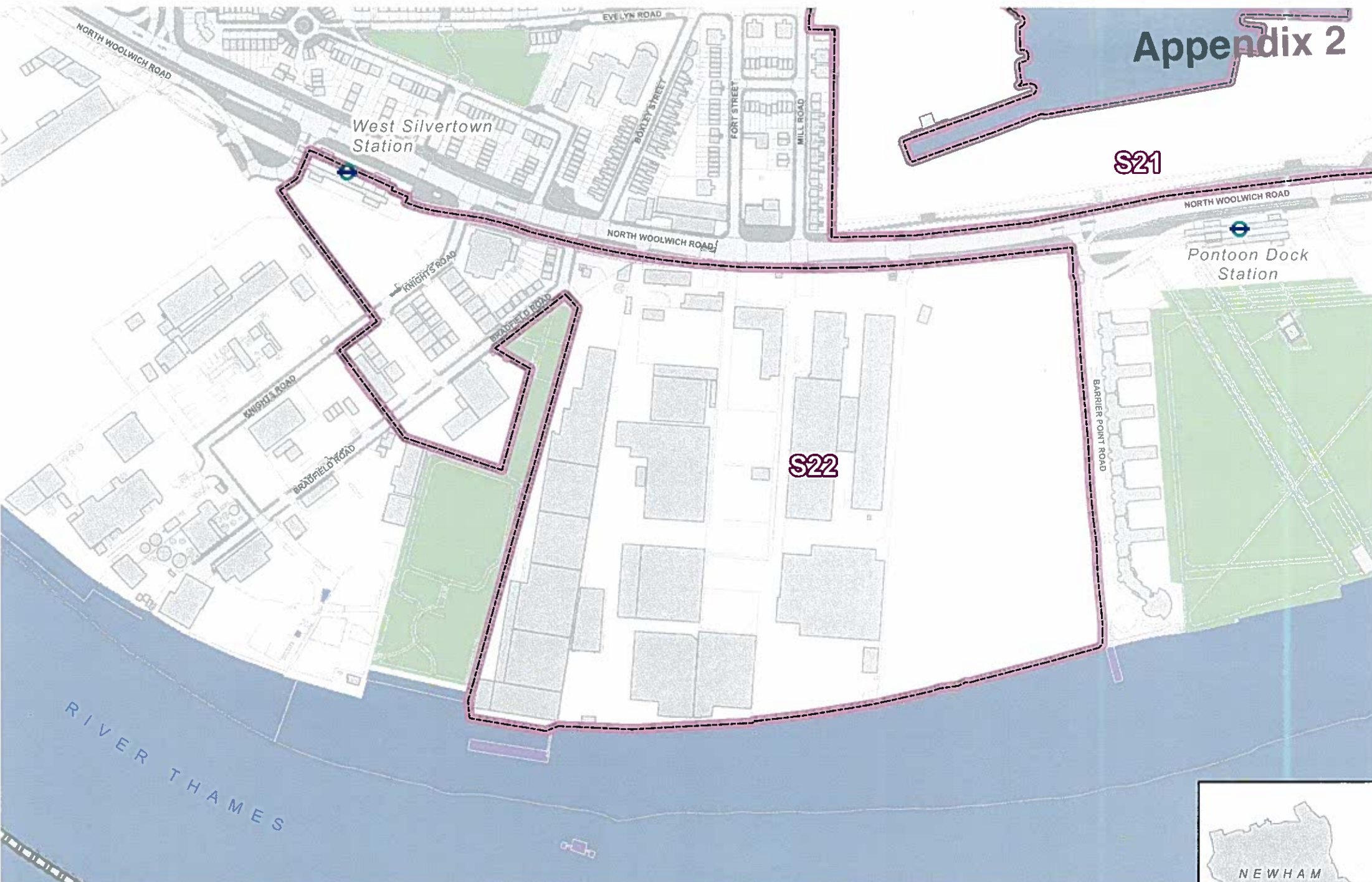
Text should be updated to say planning permission is expected to be granted shortly for the cable car.

T7 – DLR extension to Stratford International

Text should be updated to say now due to be operational by Summer 2011.

OS9 – Lea River Park

More information should be provided on the Lea River Park. Twelve Trees Crescent gasworks should be allocated as open space in the Core Strategy given that it is likely to be decommissioned by 2027. If residential development comes forward on sites S07, S08, S10 and S11 as part of mixed use development, the decommissioned gas works could help provide valuable new amenity space for the new residents. It is important that plans are provided in the core strategy of the park areas. There are new park areas not just enhanced park areas and so these should be listed in the New Open Spaces schedule. LTGDC understand that a proposals map will also be submitted with the Core Strategy and request that the Lea River Park is shown in detail on the proposals map.



Strategic Site S22

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Spatial Policies

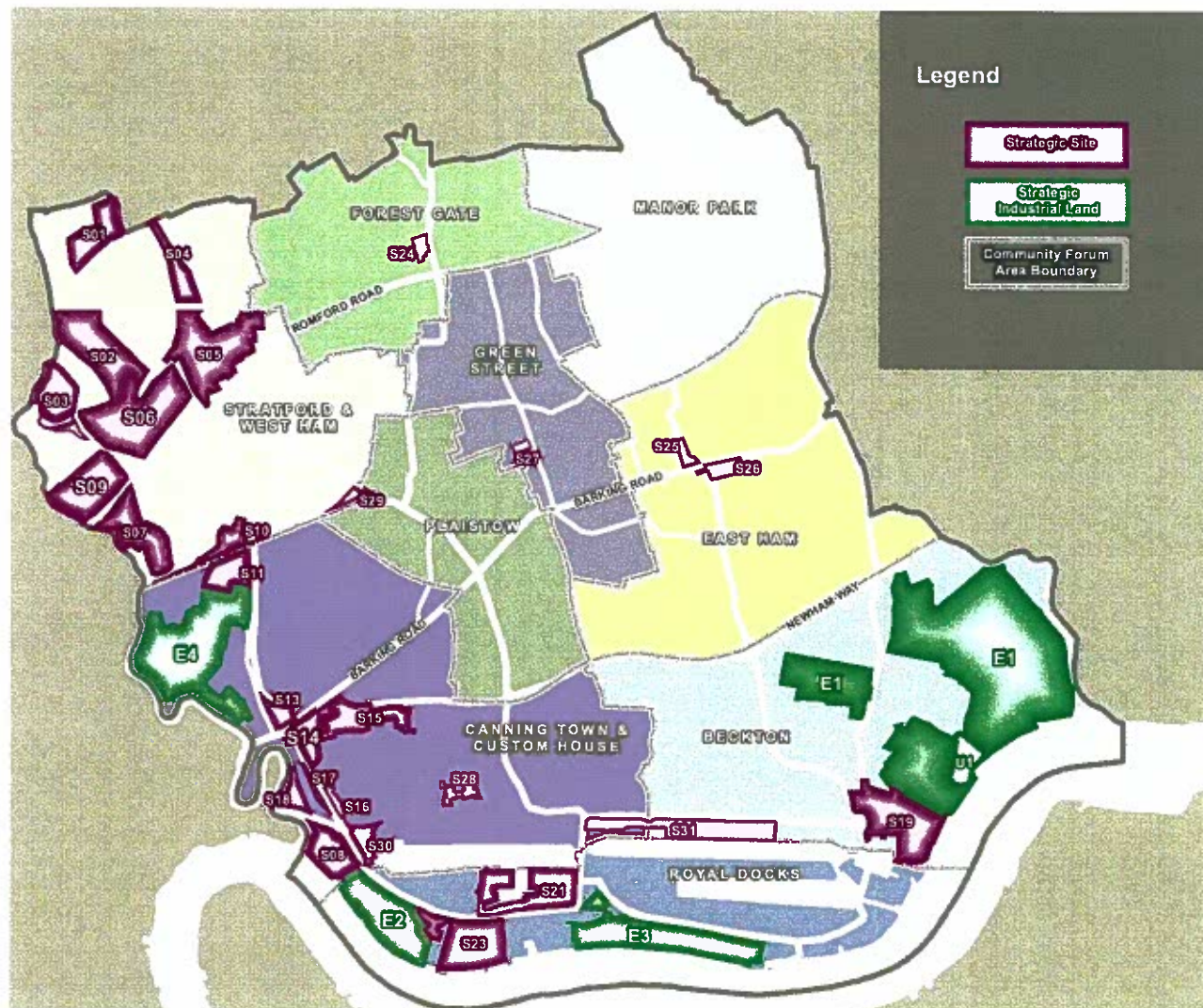
Strategic sites have been identified which will contribute to the delivery of these objectives. These are listed in Policies S2-6, and shown on the map opposite.

Reasoned Justification

The London Plan identifies two Opportunity Areas covering the 'Arc of Opportunity', stretching from Stratford and the Olympic Park, down the Lea Valley and east through the Royal Docks. The London Plan states that these areas can typically each accommodate at least 5,000 jobs and 2500 homes or a mix of the two.

Developing the extensive land available in the Arc of Opportunity provides the greatest scope to achieve transformational change in the lives of Newham's residents by providing high quality homes, employment and services and helping to achieve convergence with other neighbourhoods across London.

However this must take place in a comprehensive, rather than piecemeal manner, in order to ensure that new housing areas are not gated communities, isolated from the rest of the borough, and that new employment uses can sit comfortably alongside residential areas. Strategic Sites have therefore been proposed, setting out the mix of appropriate uses and key development principles for each, to



Core Policies

Appendix 4

