

Thameside West

**Addendum Planning, Density Management &
Employment Re-Provision Statement**

May 2020



PREAMBLE

Silvertown Homes Limited (SHL) and Greater London Authority Land and Property (GLAP) have submitted a hybrid planning application to the London Borough of Newham (LBN) for the redevelopment of the Thameside West site, accessed off Dock Road in Newham (the Site).

SHL is a property development company and joint land owners of the Site. SHL has over 65 years combined experience at delivering high quality regeneration projects across London. GLAP is a subsidiary corporation of the Greater London Authority (GLA) and took over assets and liabilities from the London Development Agency (LDA) in 2012. GLAP is primarily focused on delivering genuinely affordable homes and jobs for London.

The proposal is to construct a new high-quality residential-led mixed-use development comprising new homes, new industrial floorspace, a new local centre, a new primary school and nursery school, new community facilities, a new public park (with associated outdoor play facilities), enhanced SINC and over 800m of new riverside walk along the River Thames with ecological / biodiversity enhancements. This development has been designed to focus its community hub around the delivery of a new Dockland Light Rail (DLR) station that is proposed to be constructed on the Site by Transport for London's (TfL) in 2023.

The proposals have been designed by Foster & Partners, John McAslan & Partners, Patel Taylor and the wider project team (listed, right) taking into account comments provided by local residents during summer and public exhibition events and comments provided during pre-application discussions with a variety of statutory and non-statutory interests, including LBN and its Design Review Panel (DRP), the Greater London Authority (GLA), Transport for London (TfL), Environment Agency (EA), Port of London Authority (PLA) and London City Airport (LCA).

This document is one of a suite of planning application documents submitted to LBN, including an Environmental Statement. The planning application is available to review at LBN's office or using LBN's online services:

Search for planning application reference number 18/03557/OUT at: <https://pa.newham.gov.uk/online-applications/search.do?action=simple>

The planning application can also be viewed on the GLA's website at: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings>

PROJECT TEAM

GREATERLONDONAUTHORITY

**BARTON
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ENGINEERING**

MEINHARDT

AnsteyHorne

SYSTRA

Aviaire WILDLIFE HAZARD
MANAGEMENT
CONSULTANTS
Improving safety from the ground up.

**Winckworth
Sherwood**

MOLA

JLL | *Achieve
Ambitions*

**LONDON
COMMUNICATIONS
AGENCY**

realm
virtually, anything is possible.

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Appendix 7: DCO / Waterside Studios Car Parking Information

Project Ref:	26299/A5
Status:	Final
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1.0 Introduction

1.1 A hybrid planning application (reference: 18/03557/OUT) was submitted to the London Borough of Newham (LBN) in December 2018 by Silvertown Homes Ltd (SHL) and Greater London Authority Land and Property Ltd (GLAP) (the "Applicants") in respect of the phased redevelopment of land off Dock Road and adjacent to the River Thames, known as Thameside West, as is illustrated in Figure 1 below (the "Site").

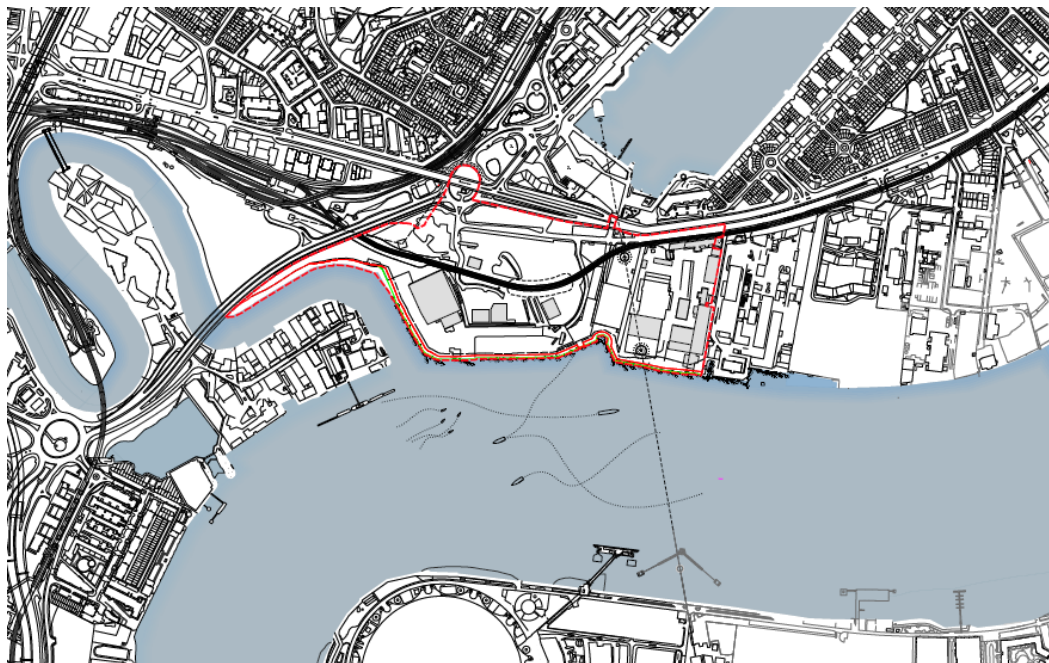


Figure 1 – The Site (delineated by the red line)

1.2 Phase 1 of the development is submitted in full detail and all other phases of the development, as well as a new river wall, are submitted in outline (with all matters reserved). The planning application was validated by LBN in January 2019 under reference 18/03557/OUT.

1.3 The Applicants submitted amendments to the Proposals and supporting planning application material to LBN on 17th May 2019, which included:

- Amendments to the external appearance of the Phase 1 development (Buildings A & B);
- Altering the phasing of the Proposals to bring forward the industrial phase of the development into Phase 3;

- Altering the description of development in relation to the industrial use classes proposed;
- Updating the traffic modelling;
- Updating the noise and air quality assessments to include the scenario of the retention of the Thames Wharf Safeguarded Wharf and other neighbouring wharves;
- Updating the Chapters of the Environmental Statement (ES) to take account of the comments received by statutory consultees; and
- Other minor amendments.

1.4 Following further discussions with LBN, the Applicants submitted a second set of amendments to the Proposals and supporting planning application material, which included:

- Reducing the massing of Buildings E and F and increasing the massing of the lower elements of Buildings Q, R, S, T and U;
- Undertake amendments to the elevation treatment of Buildings A and B (but no massing changes);
- Marginally increasing the height of Building V;
- Alterations to the ancillary uses proposed at podium level in Buildings A and B; and
- Alterations to the podium level and ground level landscaping within Phase 1.

1.5 LBN 'resolved to refuse' the planning permission on 12th November 2019 for 15 reasons, subject to referral to the Mayor of London (MOL). On 2nd December 2019 the MOL 'directed' that the planning application is determined by the Greater London Authority (GLA) as the new determining planning authority. The GLA's Planning, Design and Viability Teams have undertaken further discussions with the Applicants, with LBN observing, resulting in further amendments to the Proposals. These amendments have result in massing changes to the schemes which has adjusted the amount of residential units and non-residential floorspace being delivered in each phase of the development.

1.6 A third set of amendments has now (May 2020) been submitted by the Applicants in relation to the Proposals and associated planning application material. The amendments comprise:

- A significant reduction in the massing of Building A;
- Decreasing the overall height of Building B;

- Internal and external amendments to the Buildings A and B;
- Amendments to the landscape proposals and a reduction in amount of car and cycle parking proposed for Buildings A & B;
- Decreasing the overall height of Building C;
- Reducing the massing of Building D (focusing on the wings adjacent to the Allnex site) to form a stepping down in massing and the massing redistributed to Buildings N, M and J;
- Adjusting the heights of Buildings E & F and the position of the lower podium to improve proximity between the buildings and to improve the outlook of residential units;
- Increasing the separation distances in between Buildings H, K, L and P (Thameside Crescent) to ensure separation distances between habitable rooms for single aspect units achieve a minimum of 18m;
- Buildings S and T have increased in height;
- Increasing the separation distance in between Buildings Q and U to improve views and access from the Station Square to the riverside walkway; and
- Reducing the height of the lower parts of Buildings Q & U to increase separation distances.

1.7 The purpose of this Revised Addendum Planning, Density Management & Employment Re-Provision Statement (May 2020) ("Addendum PDM&ERS (May 2020)") is to support the hybrid planning application alongside the original Planning Statement (December 2018), Density Management Plan (December 2018) and Employment Re-Provision Statement (December 2018) submitted to LBN in December 2018. It specifically provides background details on the amendments to the redevelopment Proposals for the Site since the planning application was submitted to LBN in December 2018 and explains that the conclusions of the abovementioned original Planning Statement, Density Management Plan and Employment Re-Provision Statement remain unchanged despite the amendments to the Proposals.

1.8 For the sake of clarity, this Addendum PDM&ERS (May 2020) replaces the Addendum PDM&ERS (May 2019) and the Addendum PDM&ERS (June 2019) which have previously been submitted to LBN and the GLA.

1.9 Section 4 of this Addendum PDM&ERS (May 2020) provides further detail on the amendments to the Proposals made since December 2018 (as submitted to LBN in May and June 2019 and now in May 2020) in order to respond to comments received from the GLA's Planning, Design and Viability Teams, LBN's Planning and Design

Teams, LBN's Design Review Panel (DRP) and other consultees. The abovementioned amendments to the Proposals require the need to update the reports and drawings previously submitted to LBN in December 2018, May 2019 and June 2019.

- 1.10 Section 4 of this Addendum PDM&ERS (May 2020) also explains why the fifteen reasons for refusal, as set out in LBN's Planning Committee report (dated 12th November 2019) are unsound in strategic planning terms. This explanation should be documented in the planning application documents, hence there is another reason to update the original Planning Statement (December 2018) through this Addendum PDM&ERS (May 2020) and other planning application documents.

Application Documents

- 1.11 Section 1 of the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) submitted with the planning application include a list of technical documents which were prepared and submitted as part of the planning application.
- 1.12 Following the completion of three sets of amendments to the Proposals, this Addendum PDM&ERS (May 2020) explains which original and Addendum technical documents and 'letters of comfort' should now be considered in the determination of the planning application, as listed in Table A, overleaf. It should be noted that the documents that have been "struck-through" have been superseded.

Environmental Statement

- 1.13 The planning application is supported by an Environmental Statement (ES) which was submitted to LBN in December 2018. Section 1 of the original Planning Statement (December 2018) submitted with the planning application includes a list of chapters contained within the ES.
- 1.14 On 3rd May 2019, LBN issued a request under Regulation 25(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) to provide further information in respect of the ES submitted in support of the planning application. The first set of amendments were supported by an ES Addendum (May 2019).

Table A:			
DOCUMENTS AND DRAWINGS SUBMITTED – DECEMBER 2018	DOCUMENTS AND DRAWINGS SUBMITTED – MAY 2019	DOCUMENTS AND DRAWINGS SUBMITTED – JUNE 2019	ANTICIPATED DRAWINGS AND DOCUMENTS TO BE SUBMITTED – MAY 2020
Covering letter – December 2018	Cover letter – May 2019	Cover letter – June 2019	Cover letter – May 2020
Planning Application Forms (including Certificate of Ownership & Additional CIL Information Forms)	Updated Planning Application Forms (including Certificate of Ownership & Additional CIL Information Forms) – May 2019	Updated Planning Application Forms (including Certificate of Ownership & Updated CIL Information Forms) – June 2019	Updated Planning Application Forms (including Certificate of Ownership & Updated CIL Information Forms) – May 2020
OS Site Location Plan A-LO-011-XX-01 Rev 00	-	-	-
Existing drawings			
Site Levels A-EXSL-001-00-01 Rev 00	-	-	-
Site Sections 30.11.2018 REV F	-	-	-
Site Plan and Roof Heights A-EXSL-011-XX-01 Rev 00	-	-	-
Proposed drawings and Parameter Plans (Outline), including:			
Proposed Demolition Plan A-DEM-001-XX-01 Rev 00	-	-	-
Phasing Plan A-SL-011-xx-13 Rev-00	Phasing Plan A-SL-011-xx-13 Rev-01	-	Phasing Plan A-SL-011-xx-13 Rev 04
Parameter Plan 01: Extent of Outline and Full/Detailed Areas A-SL-011-XX-01 Rev 00	-	-	-
Parameter Plan 02: Development Zones A-SL-011-XX-02 Rev 00	-	-	Parameter Plan 02: Development Zones A-SL-011-XX-01 Rev 01
Parameter Plan 03: Horizontal Deviation Limit A-SL-011-XX-03 Rev 00	-	-	Parameter Plan 03: Horizontal Deviation Limit A-SL-011-XX-03 Rev 02
Parameter Plan 04: Maximum Height Limit A-SL-011-XX-04 Rev 00	-	Parameter Plan 04: Maximum Height Limit A-SL-011-XX-04 Rev-01	Parameter Plan 04: Maximum Height Limit A-SL-011-XX-04 Rev 03
Parameter Plan 05: Access and Circulation Plan A-SL-011-XX-05 Rev 00	-	-	Parameter Plan 05: Access and Circulation Plan A-SL-011-XX-05 Rev 03
Parameter Plan 05a: Vehicular Access A-SL-011-XX-05A Rev 00	-	-	Parameter Plan 05a: Vehicular Access A-SL-011-XX-05A Rev 02
Parameter Plan 05b: Pedestrian and Cycle Access A-SL-011-XX-05B Rev 00	-	-	Parameter Plan 05b: Pedestrian and Cycle Access A-SL-011-XX-05B Rev 01
Parameter Plan 06: Landscape Treatment Plan A-SL-011-XX-06 Rev 00	-	-	Parameter Plan 06: Landscape Treatment Plan A-SL-011-XX-06 Rev 02
Parameter Plan 07: Proposed Site Levels A-SL-011-XX-07 Rev 00	-	-	Parameter Plan 07: Proposed Site Levels A-SL-011-XX-07 Rev 01

Parameter Plan 08: Proposed Site Lower Ground Levels & Horizontal Deviation Limit A-SL-011-XX-08 Rev 00	-	-	Parameter Plan 08: Proposed Site Lower Ground Levels & Horizontal Deviation Limit A-SL-011-XX-08 Rev 03
Parameter Plan 09: Principle Uses at Entry Level A-SL-011-XX-09 Rev 00	Parameter Plan 09: Principle Uses at Entry Level A-SL-011-XX-09 Rev 01	-	Parameter Plan 09: Principle Uses at Entry Level A-SL-011-XX-09 Rev 03
Parameter Plan 10: Principle Uses at First Floor Level A-SL-011-XX-10 Rev 00	Parameter Plan 10: Principle Uses at First Floor Level A-SL-011-XX-10 Rev 01	-	Parameter Plan 10: Principle Uses at First Floor Level A-SL-011-XX-10 Rev 02
Parameter Plan 11: Principle Uses at Typical Upper Floor Level A-SL-011-XX-11 Rev 00	-	-	Parameter Plan 11: Principle Uses at Typical Upper Floor Level A-SL-011-XX-11 Rev 01
Proposed drawings (Detail – Phase 1), including:			
Site Location Plan 2018-JMP-P1-XX-DR-A-0001 Rev P01	-	-	Site Location Plan 2018-JMP-P1-XX-DR-A-0001 Rev P04
Proposed Site Plan 2018-JMP-P1-XX-DR-A-0010 Rev P01	-	-	Phase 1 Site Plan 2018-JMP-P1-XX-DR-A-0010 Rev P04
Proposed Ground Floor Plan (temporary condition) 2018-JMP-P1-GF-DR-A-3000 Rev P01	Proposed Ground Floor Plan (temporary condition) 2018-JMP-P1-GF-DR-A-3000 Rev P02	Proposed Ground Floor Plan (temporary condition) 2018-JMP-P1-GF-DR-A-3000 Rev P03	Proposed Ground Floor Plan (temporary condition) 2018-JMP-P1-GF-DR-A-3000 Rev P06
Proposed Ground Floor Plan (emerging masterplan context) 2018-JMP-P1-GF-DR-A-3010 Rev P01	Proposed Ground Floor Plan (emerging masterplan context) 2018-JMP-P1-GF-DR-A-3010 Rev P02	Proposed Ground Floor Plan (emerging masterplan context) 2018-JMP-P1-GF-DR-A-3010 Rev P03	Proposed Ground Floor Plan (emerging masterplan context) 2018-JMP-P1-GF-DR-A-3010 Rev P06
Proposed Mezzanine Floor Plan 2018-JMP-P1-M1-DR-A-3110 Rev P01	Proposed Mezzanine Floor Plan 2018-JMP-P1-M1-DR-A-3110 Rev P02	Proposed Mezzanine Floor Plan 2018-JMP-P1-M1-DR-A-3110 Rev P03	Proposed Mezzanine Floor Plan 2018-JMP-P1-M1-DR-A-3110 Rev P06
Proposed First Floor Plan 2018-JMP-P1-01-DR-A-3210 Rev P01	Proposed First Floor Plan 2018-JMP-P1-01-DR-A-3210 Rev P02	Proposed First Floor Plan 2018-JMP-P1-01-DR-A-3210 Rev P03	Proposed First Floor Plan 2018-JMP-P1-01-DR-A-3210 Rev P06
Proposed 2nd to 13th Floor Plan 2018-JMP-P1-02-DR-A-3300 Rev P01	-	-	Proposed 2nd to 11th Floor Plan 2018-JMP-P1-02-DR-A-3300 Rev P02
-	-	-	Proposed 12th and 13th Floor Plan 2018-JMP-P1-14-DR-A-3400 Rev P01
Proposed 14th and 15th Floor Plan 2018-JMP-P1-14-DR-A-3500 Rev P01	-	-	Proposed 14th Floor Plan 2018-JMP-P1-14-DR-A-3500 Rev P03
-	-	-	Proposed 15th Floor Plan 2018-JMP-P1-14-DR-A-3510 Rev P1
Proposed 16th and 17th Floor Plan 2018-JMP-P1-16-DR-A-3600 Rev P01	-	-	Proposed 16th and 17th Floor Plan 2018-JMP-P1-16-DR-A-3600 Rev P03
Proposed 18th Floor Plan 2018-JMP-P1-18-DR-A-3700 Rev P01	-	-	Proposed 18th Floor Plan 2018-JMP-P1-18-DR-A-3700 Rev P03
Proposed 19th Floor Plan 2018-JMP-P1-19-DR-A-3800 Rev P01	-	-	Proposed 19th Floor Plan 2018-JMP-P1-19-DR-A-3800 Rev P03
Proposed Roof Plan 2018-JMP-P1-RF-DR-A-3900 Rev P01	-	-	Proposed Roof Plan 2018-JMP-P1-RF-DR-A-3900 Rev P03

Southwest Elevation 2018 JPM P1 SW DR A-4000 Rev P01	Southwest Elevation 2018 JPM P1 SW DR A-4000 Rev P02	Southwest Elevation 2018 JPM P1 SW DR A-4000 Rev P03	Southwest Elevation 2018-JPM-P1-SW-DR-A-4000 Rev P05
Northeast Elevation 2018 JPM P1 NE DR A-4200 Rev P01	Northeast Elevation 2018 JPM P1 NE DR A-4200 Rev P02	Northeast Elevation 2018 JPM P1 NE DR A-4200 Rev P03	Northeast Elevation 2018-JPM-P1-NE-DR-A-4200 Rev P05
Northwest Elevation 2018 JPM P1 NW DR A-4300 Rev P01	Northwest Elevation 2018 JPM P1 NW DR A-4300 Rev P02	Northwest Elevation 2018 JPM P1 NW DR A-4300 Rev P03	Northwest Elevation 2018-JPM-P1-NW-DR-A-4300 Rev P05
Southeast Elevation 2018 JPM P1 SE DR A-4400 Rev P01	Southeast Elevation 2018 JPM P1 SE DR A-4400 Rev P02	Southeast Elevation 2018 JPM P1 SE DR A-4400 Rev P03	Southeast Elevation 2018-JPM-P1-SE-DR-A-4400 Rev P05
Building A Northwest Elevation 2018 JPM 1A-NW DR A 4500 Rev P01	Building A Northwest Elevation 2018 JPM 1A-NW DR A 4500 Rev P02	Building A Northwest Elevation 2018-JPM 1A-NW DR A 4500 Rev P03	Building A Northwest Elevation 2018-JPM-1A-NW-DR-A-4500 Rev P05
Building B Southeast Elevation 2018 JPM 1B-SE DR A4600 Rev P01	Building B Southeast Elevation 2018 JPM 1B-SE DR A4600 Rev P02	Building B Southeast Elevation 2018-JPM 1B-SE DR A4600 Rev P02	Building B Southeast Elevation 2018-JPM-1B-SE-DR-A4600 Rev P05
Building A Cross Section AA 2018 JPM 1A-AA-DR A 5000 Rev P01	-	-	Building A Cross Section AA 2018-JPM-1A-AA-DR-A-5000 Rev P03
Building B Cross Section BB 2018 JPM 1B-BB-DR A 5100 Rev P01	-	-	Building B Cross Section BB 2018-JPM-1B-BB-DR-A-5100 Rev P03
Buildings A and B Long Section CC 2018 JPM-P1-CC-DR A 5200 P01	-	-	Buildings A and B Long Section CC 2018-JPM-P1-CC-DR-A-5200 P03
Building B Bay 01 Entrance 2018 JPM 1B-NW-DR A 6000 Rev P01	Building B Bay 01 Entrance 2018 JPM 1B-NW-DR A 6000 Rev P02	Building B Bay 01 Entrance 2018 JPM 1B-NW-DR A 6000 Rev P03	Building B Bay 01 Entrance 2018-JPM-1B-NW-DR-A-6000 Rev P04
Building B Bay 02 2018 JPM 1B-SW DR A-6100 Rev P01	Building B Bay 02 2018 JPM 1B-SW DR A-6100 Rev P02	Building B Bay 02 2018 JPM 1B-SW DR A-6100 Rev P03	Building B Bay 02 2018-JPM-1B-SW-DR-A-6100 Rev P04
Building B Bay 03 2018 JPM 1B-SW DR A-6200 Rev P01	Building B Bay 03 2018 JPM 1B-SW DR A-6200 Rev P02	Building B Bay 03 2018 JPM 1B-SW DR A-6200 Rev P03	Building B Bay 03 2018-JPM-1B-SW-DR-A-6200 Rev P04
			Building B Bay 05 2018-JPM-1B-SW-DR-A-6400 Rev -
			Building B Bay 06 2018-JPM-1B-SW-DR-A-6500 Rev -
Landscape drawings (Detail – Phase 1) For Approval, including:			
-	-	-	522-PT-MP-TYP-DR-L-PL-1011_ Rev PL1
-	-	-	522-PT-MP-TYP-DR-L-PL-1013_ Rev PL1
-	-	-	522-PT-MP-TYP-DR-L-PL-1001_ Rev PL1
-	-	-	522-PT-MP-TYP-DR-L-PL-1002_ Rev PL1
-	-	-	522-PT-MP-TYP-DR-L-PL-1991_ Rev PL1
Masterplan Landscape Drawings (For Information), including:			
-	-	-	522-PT-MP-TYP-DR-L-PL-1001_ Rev P21
-	-	-	522-PT-MP-TYP-DR-L-PL-1002_ Rev P08
-	-	-	522-PT-MP-TYP-DR-L-PL-1005_ Rev P09
-	-	-	522-PT-MP-TYP-DR-L-PL-1009_ Rev P10
-	-	-	522-PT-MP-TYP-DR-L-PL-1010_ Rev P06
-	-	-	522-PT-MP-TYP-DR-L-PL-1011_ Rev P08

-	-	-	522-PT-MP-TYP-DR-L-PL-1019_Rev P10
-	-	-	522-PT-MP-TYP-DR-L-PL-1021_Rev P06
-	-	-	522-PT-MP-TYP-DR-L-PL-1027_Rev P07
-	-	-	522-PT-MP-TYP-DR-L-PL-1028_Rev P07
-	-	-	522-PT-MP-TYP-DR-L-PL-1038_Rev P02
-	-	-	522-PT-MP-TYP-DR-L-PL-1039_Rev P02
Landscape GF/Mezzanine—Long Term 522-PT-MP-TYP-DR-L-PL-1013_Rev PL1	Landscape GF/Mezzanine—Long Term 522-PT-MP-TYP-DR-L-PL-1013_Rev PL2	Landscape GF/Mezzanine—Long Term 522-PT-MP-TYP-DR-L-PL-1013_Rev PL3	Landscape GF/Mezzanine – Long Term 522-PT-MP-TYP-DR-L-PL-1013_Rev P09
Landscape GF—Short Term 522-PT-MP-TYP-DR-L-PL-1014_Rev PL1	Landscape GF—Short Term 522-PT-MP-TYP-DR-L-PL-1014_Rev PL2	Landscape GF—Short Term 522-PT-MP-TYP-DR-L-PL-1014_Rev PL3	Landscape GF – Short Term 522-PT-MP-TYP-DR-L-PL-1014_Rev P10
Landscape 1st Floor—Podium level 522-PT-MP-TYP-DR-L-PL-1016_Rev PL1	Landscape 1st Floor—Podium level 522-PT-MP-TYP-DR-L-PL-1016_Rev PL2	Landscape 1st Floor—Podium level 522-PT-MP-TYP-DR-L-PL-1016_Rev PL3	Landscape 1st Floor – Podium level 522-PT-MP-TYP-DR-L-PL-1016_Rev P09
Landscape Roof Level 522-PT-MP-TYP-DR-L-PL-1017_Rev PL1	-	-	Landscape Roof Level 522-PT-MP-TYP-DR-L-PL-1017_Rev P07
-	Play Allocation 22-PT-MP-TYP-DR-L-PL-1031_Rev PL1	Play Allocation 22-PT-MP-TYP-DR-L-PL-1031_Rev PL2	Play Allocation 22-PT-MP-TYP-DR-L-PL-1031_Rev P08
-	-	-	Landscape Urban Greening Factor – 522-PT-MP-TYP-DR-L-PL-1006_Rev P15
-	-	-	Landscape SINC Areas - 522-PT-MP-TYP-DR-L-PL-1007_Rev P10
-	-	-	Landscape - 522-PT-MP-TYP-DR-L-PL-1008_Rev P10
-	-	-	Landscape Riverwall Strategy - 522-PT-MP-TYP-DR-L-PL-1025_Rev P08
-	-	-	Landscape Hardscape Strategy - 522-PT-MP-TYP-DR-L-PL-1018_Rev P07
-	-	-	Landscape Softplay Strategy - 522-PT-MP-TYP-DR-L-PL-1020_Rev P11
-	-	-	Landscape - 522-PT-MP-TYP-DR-L-PL-1030_Rev P10
Proposed River Wall drawings, including:			
Proposed Site Plan CW5210_Rev 00	-	-	Proposed Site Plan CW5210_Rev 01
Sections CW5211 to CW5223_Rev 00	-	-	-
Other Documents:			
Schedules of accommodation (December 2018)	-	Schedules of accommodation, dated 20 th June 2019	Schedules of accommodation – May 2020
Design and Access Statement (Volume 1: Outline) (December 2018)	Design and Access Statement (Volume 1: Outline) – May 2019	Design and Access Statement (Volume 1: Outline) – June 2019	Design and Access Statement (Volume 1: Outline) (May 2020)
Design and Access Statement (Volume 2: Phase 1) (December 2018)	Design and Access Statement (Volume 2: Phase 1) Addendum – May 2019	Design and Access Statement (Volume 2: Phase 1) Addendum – June 2019	Design and Access Statement (Volume 2: Phase 1) Addendum (May 2020)

Design and Access Statement (Volume 3: Design Codes) (December 2018)	Design and Access Statement (Volume 3: Design Codes) — May 2019	Design and Access Statement (Volume 3: Design Codes) — June 2019	Design and Access Statement (Volume 3: Design Codes) (May 2020)
-	Fosters + Partners Planning Revision Tracker (to explain edits to DAS Vol 1, DAS Vol 3, Tall Building Justification Report and Parameter Drawings) — May 2019	Fosters + Partners Planning Revision Tracker (to explain edits to DAS Vol 1, DAS Vol 3, Tall Building Justification Report and Parameter Drawings) — June 2019	Fosters + Partners Planning Revision Tracker (to explain edits to DAS Vol 1, DAS Vol 3 and Design Codes) – May 2020
Planning Statement (December 2018)	Addendum Planning, Density Management & Employment Re Provision Statement — May 2019	Revised Addendum Planning, Density Management & Employment Re Provision Statement — June 2019	Addendum Planning, Density Management & Employment Re Provision Statement – May 2020
Statement of Community Involvement	Update Letter – May 2019	-	-
-	-	-	Social Values Report – May 2020
Environmental Statement (Volume 1: Main Report) (December 2018)	Environmental Statement Addendum (Volume 1: Main Report) — May 2019	Environmental Statement Addendum (Volume 1: Main Report) — June 2019	Environmental Statement Addendum (Volume 1: Main Report) – May 2020
Environmental Statement (Volume 2: Part 1) (December 2018)	-	-	Environmental Statement Addendum (Volume 2: Part 1) – May 2020
Environmental Statement (Volume 2: Part 2) (December 2018)	Environmental Statement Addendum (Volume 2: Part 2) May 2019	Environmental Statement (Volume 2: Part 2) June 2019	Environmental Statement – Addendum (Volume 2: Part 2) – May 2020
Environmental Statement (Volume 3: Technical Appendices) (December 2018)	Environmental Statement Addendum (Volume 3: Technical Appendices) — May 2019	Environmental Statement Addendum (Volume 3: Technical Appendices) — June 2019	Environmental Statement Addendum (Volume 3: Technical Appendices) – May 2020
Environmental Statement Non-Technical Summary (NTS) (December 2018)	ES Addendum NTS — May 2019	ES Addendum NTS — June 2019	ES Addendum Non-Technical Summary (NTS) – May 2020
Tall Building Justification Statement (December 2018)	Tall Building Justification Statement – May 2019	-	-
Independent Tall Buildings Statement (December 2018)	Letter of conformity — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
Energy and Sustainability Statement (including BREEAM and Overheating Analysis) (December 2018)	Energy and Sustainability Statement Addendum — May 2019	Energy and Sustainability Statement Addendum — June 2019	Energy and Sustainability Statement Addendum – May 2020
Light Within Report (December 2018)	Letter of conformity (including updated results) — May 2019	Light Within Report Addendum — June 2019	Light Within Report Addendum – May 2020
Access Statement (December 2018)	Access Statement — May 2019	Access Statement — June 2019	Access Statement – May 2020
Population Modelling Report (December 2018)	Letter of conformity — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
Employment Floorspace Re-provision Statement (December 2018)	Addendum Planning, Density Management & Employment Re Provision Statement — May 2019	Addendum Planning, Density Management & Employment Re Provision Statement — June 2019	Addendum Planning, Density Management & Employment Re Provision Statement – May 2020
Economic Development Statement (December 2018)	Letter of conformity — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
Community Facilities Statement (December 2018)	Letter of conformity — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
River Wall Structural Survey (December 2018)	Letter of conformity — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
Safeguarded Wharf Report (December 2018)	Safeguarded Wharf Report — May 2019	Letter of conformity — June 2019	Letter of conformity – May 2020
Aviation Safeguarding Assessment (December 2018)	Aviation Safeguarding Assessment — May 2019	Aviation Safeguarding Assessment — June 2019	Aviation Safeguarding Assessment -May 2020

Aviation Safeguarding Assessment – Elevated Wildlife Hazard Risk Assessment (December 2018)	Letter of conformity – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Demolition Method Statement (December 2018)	Letter of conformity – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Piling Impact Assessment (December 2018)	Letter of conformity – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Code of Construction Practice (December 2018)	Letter of conformity – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Transport Assessment (December 2018)	Transport Assessment Addendum – May 2019	Transport Assessment Addendum – June 2019	Transport Assessment Addendum – May 2020
Construction Logistics Plan (December 2018)	Construction Logistics Plan Addendum – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Site Wide Delivery and Servicing Management Plan (December 2018)	-	Letter of conformity – June 2019	Site Wide Delivery and Servicing Management Plan Addendum – May 2020
Arboricultural Survey and Impact Assessment (December 2018)	Arboricultural Survey and Impact Assessment – May 2019	Letter of conformity – June 2019	Letter of conformity – May 2020
Below Ground Drainage Strategy Phase 1 (December 2018)	Below Ground Drainage Strategy Phase 1 – May 2019	Below Ground Drainage Strategy Phase 1 – May 2019	Letter of conformity – May 2020
Masterplan and Phase 1 Outline Fire Strategy (December 2018)	Letter of conformity – May 2019	Letter of conformity – June 2019	Letter of conformity (Masterplan) – May 2020 Phase 1 Fire Strategy (May 2020)
Density Management Plan (December 2018)	Addendum Planning, Density Management & Employment Re-Provision Statement – May 2019	Addendum Planning, Density Management & Employment Re-Provision Statement – June 2019	Addendum Planning, Density Management & Employment Re-Provision Statement – May 2020
-	-	Phase I Geoenvironmental & Geotechnical Assessment -June 2019	-
Affordable Housing Statement (January 2019)	-	Affordable Housing Statement Revised – June 2019	Affordable Housing Statement Addendum – May 2020
Independent Financial Viability Assessment (January 2019)	Viability Addendum Note – May 2019	Viability Addendum Note – June 2019	Viability Addendum Note – May 2020

- 1.15 On 12th and 20th June 2019, LBN issued their formal response to the ES Addendum and other supporting documents which included requests for clarification and / or requests for further information under Regulation 25(1) of the abovementioned regulations. The first and second set of amendments to the scheme were then supported by a new ES Addendum (June 2019).
- 1.16 The ES Addendum (May 2019) and ES Addendum (June 2019) have now been superseded by the ES Addendum (May 2020), which comprises the following contents:

Table 2: ES Addendum Submitted – MAY 2020
Volume I
Chapter 1: Introduction
Chapter 2: Addendum Methodology
Chapter 3: Planning Policy Context
Chapter 4: Amendments to the Proposed Development
Chapter 5: Traffic and Transportation
Chapter 6: Noise and Vibration
Chapter 7: Air Quality
Chapter 8: Water Resources and Flood Risk
Chapter 9: Ecology
Chapter 10: Waste Management
Chapter 11: Ground Conditions
Chapter 12: Wind Microclimate
Chapter 13: Daylight, Sunlight & Overshadowing
Chapter 14: Population and Human Health
Chapter 15: Built Heritage
Chapter 16: Townscape and Visual Amenity
Chapter 17: Greenhouse Gas Emissions
Chapter 18: Cumulative and Interactive Effects
Chapter 19: Residual effects and conclusions
Volume II
Part 1 – Townscape & Visual Baseline Condition
Part 2 - Verified Photomontages: Methodology and Supporting Evidence
Volume III
4-A Maximum Height Limits
4-B Horizontal Deviation Limits
4-C Development Zones
8-A Modelling Results
8-B Traffic Data
8-C Receptor Locations

8- A Masterplan Drainage Strategy Addendum
8- B Flood Risk Assessment Addendum
8-C Phase 1 Drainage Strategy Addendum
10-A Site Waste Management Plan (SWMP)
10-B Outline Waste Management Plan (OWMP)
12-A RWDI Technical Memo
13-A Sites Plans and 3D Views of the Current Baseline Conditions (2020)
13-B Sites Plans and 3D Views of the future Baseline Conditions (2022)
13-C Sites Plans and 3D Views of the Proposed Development Scenario (2031)
13-D VSC results of the current baseline (2020) vs proposed development scenario (2031)
13-E DD results of the current baseline (2020) vs proposed development scenario (2031)
13-F DD contours of the current baseline (2020) vs proposed development scenario (2031)
13-G APSH results of the current baseline (2020) vs proposed development scenario (2031)
13-H VSC results of the future baseline (2022) vs proposed development scenario (2031)
13-I DD results of the future baseline (2022) vs proposed development scenario (2031)
13-J DD contours of the future baseline (2022) vs proposed development scenario (2031)
13-K APSH results of the future baseline (2022) vs proposed development scenario (2031)
13-L ADF results of the future baseline condition (2022) vs proposed development scenario (2031)
13-M ADF drawings for proposed development scenario (2031)
13-N APSH results of the future baseline condition (2022) vs proposed development scenario (2031)
13-O VSC and APSH façade mapping results of the future baseline condition (2022) vs proposed development scenario (2031)
13-P VSC and APSH façade mapping renders for the proposed development scenario (2031)
14-A Health Impact Assessment (HIA)
15-A Historic Environment Assessment
15-B Heritage Statement
17-A General project inputs (table update)
ES Non-Technical Summary (NTS)

1.17 The ES Addendum (May 2020) does not replace the original ES (December 2018). Both of these documents are relevant in the determination of the planning application.

1.18 This Addendum PDM&ERS (May 2020) explains that the conclusions of the original reports (see Table A) and the ES Chapters (see Table B) have not changed as a result of the accumulation of the first (May 2019), second (June 2019) and third (May 2020) set of amendments to the Proposals.

Community Consultation

- 1.19 Section 1 of the original Planning Statement (December 2018) submitted with the planning application includes a summary of the extensive amount of community consultation undertaken by the Applicants prior to submitting the planning application, in accordance with guidance set out in the National Planning Policy Framework (NPPF).
- 1.20 Following the submission and validation of the planning application, LBN undertook its own statutory consultation exercise. This has resulted in a number of responses from statutory and non-statutory consultees and residents' groups.
- 1.21 The Proposals have also been the subject of a post-submission public meeting which took place in January 2019 (as explained in **Appendix 1**); discussions with LBN's Environmental Consultants (Temple); a Design Review Panel (DRP) presentation which took place in April 2019; and, meetings with LBN's officers.
- 1.22 The majority of the first and second set of amendments to the Proposals were direct responses to the consultation responses received from LBN's internal teams, the Greater London Authority (GLA), Transport for London (TfL), Port of London Authority (PLA), London City Airport (LCY), LBN's Environmental Consultants (Temple) and LBN's DRP up to June 2019. Details of the consultation responses and the Applicant's response is set out in **Appendix 2** of this Addendum PDM&ERS (May 2020). The Applicant's response to the GLA's Stage I Response can be found at **Appendix 3**.
- 1.23 Since June 2019 and following LBN's resolution to refuse the planning application in November 2019 and MOL's direction in December 2019 that the planning application is to be determined by the GLA, the GLA's Planning, Design and Viability Teams and TfL have undertaken further discussions with the Applicants (with LBN's Planning and Design Teams and the Chairperson of the DRP observing) resulting in further amendments to the Proposals. The design evolution of the Proposals which has resulted from the abovementioned discussions is outlined in Section 4 of Volume 1 of the DAS (May 2020). A summary of the amendments can be found at paragraphs 1.3 to 1.6 of this PDM&ERS (May 2020).
- 1.24 Following the submission of the third (May 2020) set of planning application material amendments, the Applicants understand that the GLA will undertake its own consultation exercise with local stakeholders and statutory consultees prior to determining the planning application later this year.

2.0 The Site & Surrounding Area

2.1 Section 2 of the Planning Statement (December 2018) and the Employment Re-Provision Statement (December 2018) and Section 5 of the Density Management Plan (December 2018) submitted with the original planning application describe:

- The Site and surrounding area;
- The Site's Safeguarded Wharf status;
- The Site's partial designation as a Site of Importance of Nature Conservation (SINC);
- The Site's heritage setting;
- The Site's proximity to London City Airport's (LCY) Obstacle Limitation Surface (OLS), Public Safety Zone (PSZ) and asset protection zones for the cable car stanchions and DLR tracks;
- The Site's accessibility and townscape context;
- The Site's commercial floorspace demand context; and
- The Site's regeneration area context.

2.2 These sections of the abovementioned documents remain largely unchanged.

2.3 The text set out below are further points of clarity on matters that were not made clear enough in the Planning Statement (December 2018)¹. These which contained within the Addendum PDM&ERS (June 2019) and which are still relevant.

Points of Clarity

Extent of Land Subject to the Silvertown Tunnel DCO

2.4 The Site is 18.79 hectares of previously developed land and comprises four main parts (see Figure 4a overleaf): 1) the Carlsberg Tetley site; 2) the Thames Wharf site; 3) the 'Island site'; and 4) land owned by TfL. This Addendum PDM&ERS (May 2020) explains that TfL will be undertaking works on the land indicatively delineated within the green line in Figure 4a, overleaf, as part of the Silvertown Tunnel works permitted by the Silvertown Tunnel Development Consent Order (DCO).

¹ These matters of clarity were also contained within the Addendum PDM&ERS (May 2019) and Addendum PDM&ERS (June 2019) and which are still relevant today.

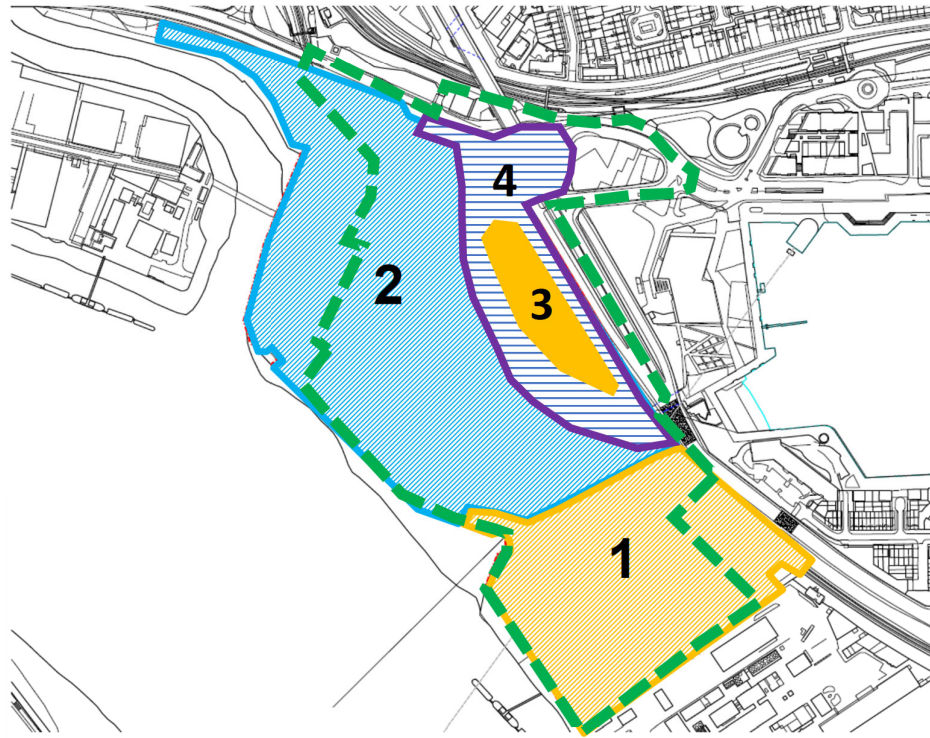


Figure 4a – Site Parts

Heritage

- 2.5 The original Planning Statement (December 2018) explains that whilst there are no conservation areas or listed buildings within the immediate setting of the Site that will constrain the scale of development on the Site (see Figure a) overleaf), the closest heritage assets are the light house which is located on Trinity Buoy Wharf located on the opposite side of the Bow Creek, a group of listed buildings fronting onto Royal Victoria Dock to the East and the setting of the River Thames. The impact of the Proposals on the setting of these heritage assets has been fully considered in the ES.
- 2.6 This Addendum PDM&ERS (May 2020) explains that Figure a) below has been adjusted in this Addendum PDM&ERS (May 2020) to identify the extent of the Site's boundary and the proximity of the Site to heritage assets.

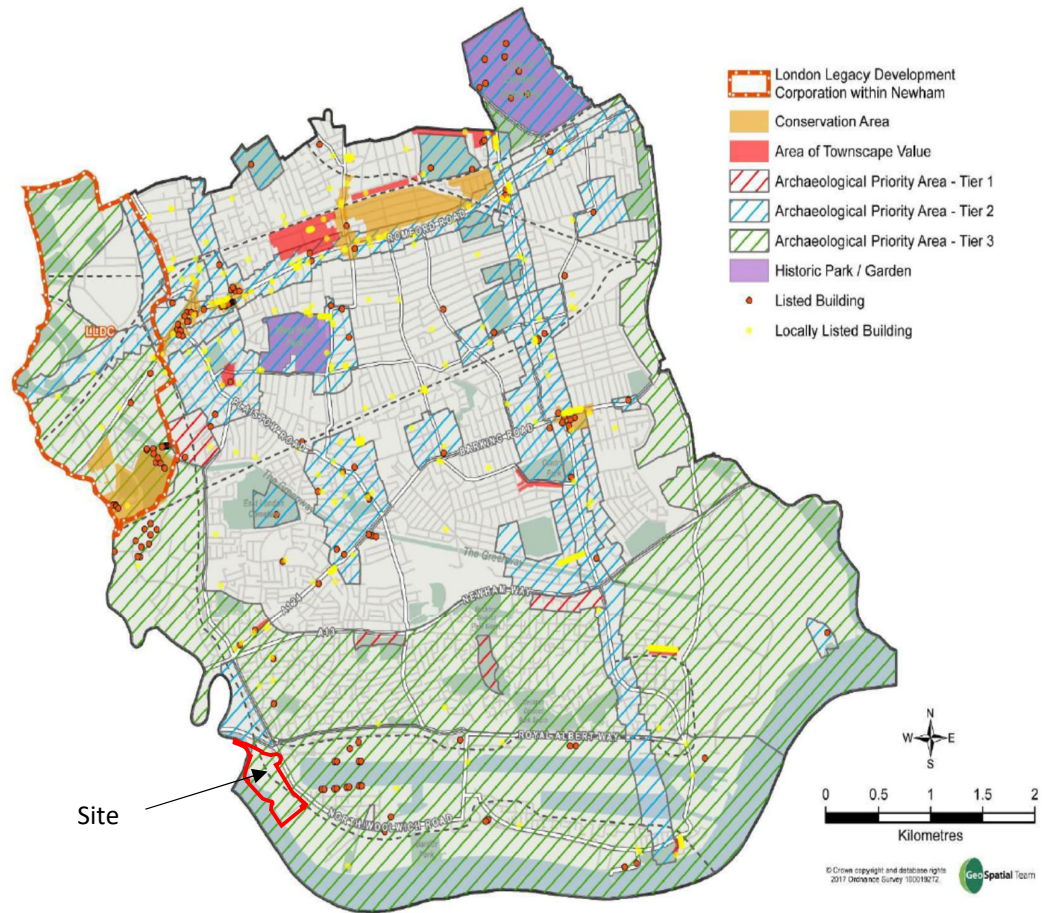


Figure a)

World Heritage Site

2.7 The original Planning Statement (December 2018) explains that the Maritime Greenwich World Heritage Site (WHS) lies approximately 4 kilometres to the south-west of the Site, however there are several developments proposed on the Greenwich Peninsula (including a 60-storey proposal) that will be constructed in the foreground, thereby restricting views of the Site and the Applicants’ Proposals. This Addendum PDM&ERS (May 2020) explains that Figure b) below has been adjusted in this Addendum PDM&ERS (May 2020) to identify the extent of the Site’s boundary and its proximity to the WHS.

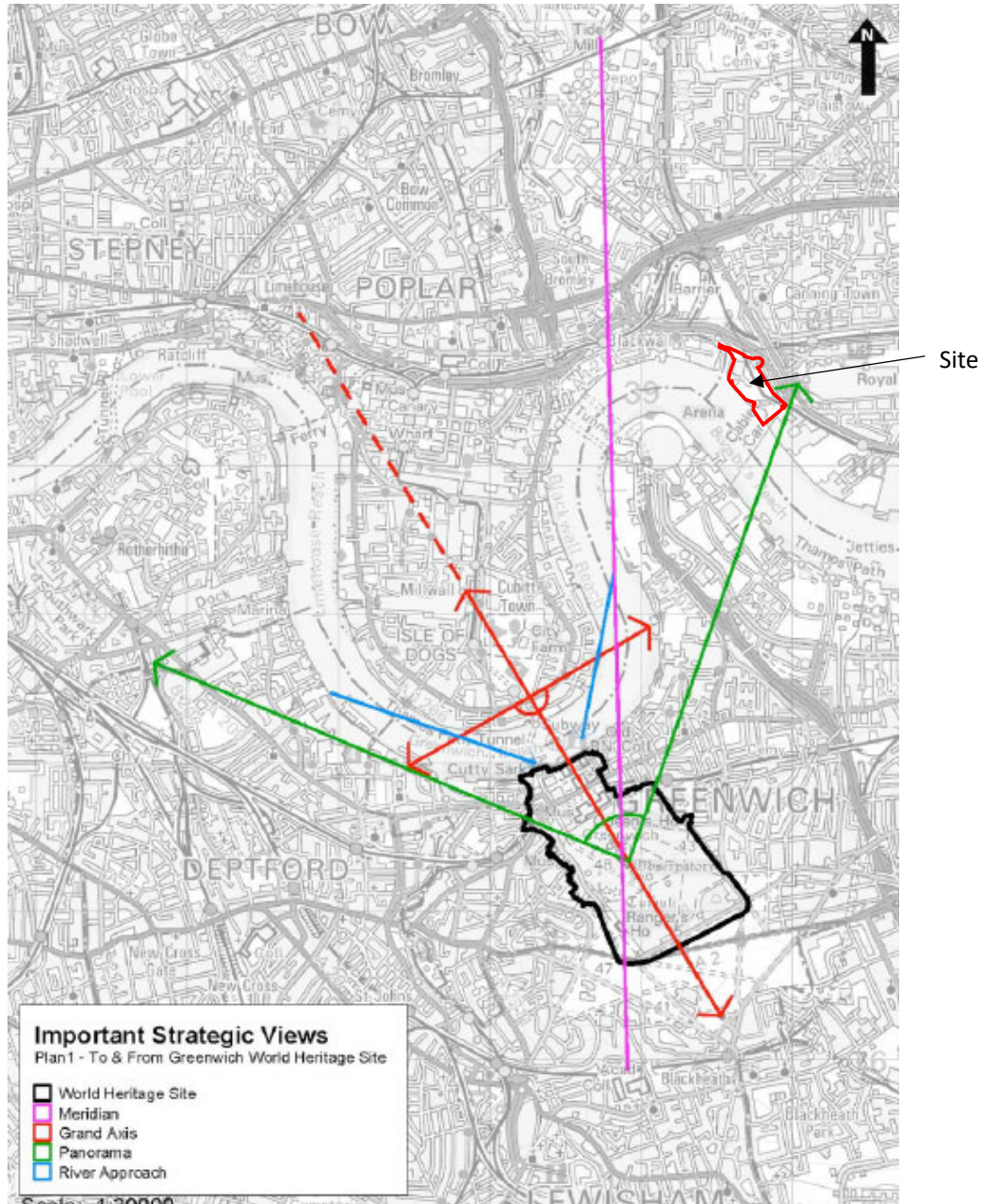


Figure b)

2.8 The original Planning Statement (December 2018) concludes that the Site is effectively a 'blank canvas' and is not the subject of the usual set of constraints faced by previously developed land in London (e.g. impact on privacy, sunlight and daylight impact, heritage impacts, etc). As such, the height and density of development on the Site, including the number and height of tall buildings, should be determined on a design-led and placemaking basis, unconstrained by indicative building height

restrictions. This Addendum PDM&ERS (May 2020) explains that this conclusion accords with the clear local, strategic and national policy directives to ensure maximum delivery of housing and jobs and efficient use of available brownfield sites that benefit from good levels of access to public transport facilities.

DLR Services & Infrastructure

2.9 The original Planning Statement (December 2018) and Density Management Plan (December 2018) discusses the 'DLR capacity improvements' and 'Bridge Infrastructure Aspirations' that will benefit the Site. In summary:

- In 2021 TfL will be funding £280m of capacity improvements to their DLR service which will see a 67% increase in DLR's capacity; and
- In 2023 TfL will be constructing the new DLR station on the Site using £13m of its own money, £10m secured via the Homes and Infrastructure Fund (HIF funding) and partially funded by financial obligations secured from development proposals.

2.10 This Addendum PDM&ERS (May 2020) explains that the HIF funding for the DLR station and capacity improvements has now been secured by GLAAP to enable TfL to undertake these works. The Applicants have agreed with TfL to pay a £6.5m contribution towards the delivery of the new DLR station, amongst other transport and other infrastructure related financial obligations, as described in paragraphs 4.58 and 4.59 of this Addendum PDM&ERS (May 2020).

2.11 This Addendum PDM&ERS (May 2020) also explains that the Proposals have been designed to 'future proof' the delivery of:

- Pedestrian / cycle bridges over Bow Creek should the required funding be made available; and
- A river pier landing point should this type of facility be required in the future.

2.12 These commitments will be secured (subject to contract) in a legal agreement, as described in paragraphs 4.58 and 4.59 of this Addendum PDM&ERS (May 2020).

3.0 Relevant Planning History

3.1 Section 3 of the original Planning Statement (December 2018) describes the planning history of the Site determined by LBN, including:

- TfL's Development Consent Order (DCO) for the Silvertown Tunnel, which was approved by the Secretary of State (SOS) on 10th May 2018;
- LBN's approval of the Applicants' Operational Works Development planning application (reference: 17/02554/FUL) and how this planning permission would result in the demolition of the existing buildings on the Site, raising of the ground level, adjustment to the extent of the SINC and replacement of the riverwall; and
- The number of constraints applied to the Site (e.g. the Silvertown Tunnel DCO, local road network and Silvertown Flyover, the DLR track and viaduct, the LCY's Public Safety Zone (PSZ) and Obstacle Limitation Surface (OLS), flood defence and site levels, SINC, Emirates cable car, electricity pylons, Jubilee Line construction constraints and other underground obstructions.

3.2 Section 3 of the original Planning Statement (December 2018) remains unchanged and is not therefore amended by this Addendum PDM&ERS (May 2020).

3.3 Notwithstanding the above, as explained in Section 1 of this Addendum PDM&ERS (May 2020), LBN 'resolved to refuse' the planning permission for the Applicants' Proposals on 12th November 2019 for fifteen reasons, subject to referral to the MOL. On 2nd December 2019 the MOL 'directed' that the planning application is determined by the Greater London Authority (GLA) as the new determining planning authority. This application has not yet been formally determined.

3.4 Sections 6 to 10 of this Addendum PDM&ERS (May 2020) explain why the fifteen reasons for refusal, as set out in LBN's Planning Committee report (dated 12th November 2019), are unsound in strategic planning terms. A copy of LBN's draft decision notice, setting out the draft reasons for refusal, is attached as **Appendix 4**.

4.0 The Proposals

4.1 Section 4 of the original Planning Statement (December 2018) summarises the Applicants' 'vision' for the Site, which is to deliver:

- An exciting, high-quality, landscape-led masterplan with distinctive character areas and buildings;
- Replacement industrial floorspace that meet the needs of the modern industrial occupiers in this gateway location;
- Retail and community floorspace focused local centre set around a new DLR Station and its associated station square;
- New ground-breaking 'co-location' development that will allow industrial and residential functions to co-exist satisfactorily on the same site;
- A highly attractive gateway development that will act as a marker-point for the local population to signify access to the River Thames and new recreational facilities;
- A sustainable, low-energy, low-carbon development that will deliver affordable homes, jobs and enhanced biodiversity habitat; and
- A mixed-use scheme that 'future proofs' the delivery of TfL's and GLAP's proposed new local infrastructure capacity improvements, including new DLR station, bridges over Bow Creek and a landing point for a new river pier.

4.2 This vision will be delivered by the Applicants' Proposals. The vision has not changed since the planning application was submitted to LBN in December 2018.

4.3 Section 4 of the original Planning Statement (December 2018) also sets out the scope for the hybrid application², explains the purpose of the Parameter Plans / Design Code and describes the Proposals in detail. This Addendum PDM&ERS (May 2020) confirms that these matters remain unchanged, other than the phasing of development, the massing of the buildings and an amendment to the proposed industrial uses (as described below).

4.4 Set out below is a summary of the current Proposals and confirmation of the revisions when compared to the original Proposals (December 2018). The amendments are highlighted via strike-through text (deletion) and underline text (additional).

² A 'full detailed' component that relates to Phase 1 of the proposal which will be constructed whilst the Silvertown Town DCO works are taking place; and an 'outline' component (with all matters reserved) that relate to the phased construction of all remaining phases of the Proposal, including the river wall, and will take place during and after the Silvertown Town DCO works.

The Proposals

4.5 The Proposals will utilise the Site (from circa. November 2020 onwards) for the construction of a residential-led mixed-use scheme. This is to be secured through a 'hybrid' planning permission. The Proposals are summarised as follows:

- 5,000 new homes (441,141 sqm GEA);
- 15,000 sqm (GEA) of flexible employment floorspace (Classes B1c, B2 and B8);
- 4,441 sqm (GEA) of flexible employment floorspace (Classes B1b, B1c, B2 (restricted³) and B8);
- 7,368 sqm (GEA) of flexible retail floorspace (Classes A1 to A4);
- 4,272 sqm (GEA) of primary school floorspace (Class D2);
- 2,783 sqm (GEA) of community and leisure floorspace (Classes D1 and D2);
- ~~529~~ 453 vehicle parking, loading and drop-off spaces⁴;
- ~~9,812~~ 9,833 cycle parking spaces (686 x commercial & 9,147 x residential spaces);
- 36,300 sqm of private amenity space (e.g. balconies, private roof terraces);
- ~~24,786~~ 21,033 sqm semi-private amenity space (e.g. podium decks, communal roof terraces);
- ~~83,236~~ 64,445 sqm public realm⁵ (e.g. riverside walk, park, station square, pocket gardens, pedestrianised areas); and
- ~~21,649~~ 22,065 sqm of enhanced habitat, SINC and intertidal habitat along the river wall.

4.6 In the event that the Mayor of London approved the Proposals, the maximum gross external area (GEA) and minimum gross internal areas (GIA) for each proposed use will be set out in a condition that will be attached to the decision notice, as indicated below in Table 2.1

³ These restrictions are set out in JLL's Addendum Co-Location Report attached as Appendix 5 to this Addendum PDM&ERS (May 2020)

⁴ This figure excludes the car parking spaces that have been reprovided for the Waterside Studios and the car parking spaces provided for the Silvertown Tunnel operation centre energy centre, as illustrated on the masterplan landscape drawings.

⁵ The previous figure of 83,236 sqm of public realm included land within the Silvertown Tunnel area that would not be made available for the general public. This has now been removed from the calculations.

Table 2.1				
Phase 1	Maximum	GEA	Minimum	GIA
	(sqm)		(sqm)	
Residential Floorspace*	37,951		35,158	
Flexible employment floorspace (Classes B1b, B1c, B2 (restricted ⁶) and B8);	3,608		3,350	
Flexible retail floorspace (Classes A1 to A4);	230		198	
Phase 2 to 11	Maximum	GEA	Minimum	GIA
	(sqm)		(sqm)	
Residential Floorspace*	403,190		383,031	
Flexible employment floorspace (Classes B1c, B2 and B8);	15,000		14,250	
Flexible employment floorspace (Classes B1b, B1c, B2 (restricted ⁷) and B8);	833		791	
Flexible retail floorspace (Classes A1 to A4);	7,138		6,781	
Primary School	4,272		4,058	
Nursery	993		943	
Other Community and leisure floorspace (Classes D1 and D2);	1,790		1,721	

*excluding ancillary car parking and plant areas

Description of Development

- 4.7 In light of the first (May 2019), second (June 2019) and third (May 2020) set of amendments to the Proposals, the description of development set out in Section 4 of the original Planning Statement (December 2018), Section 4 of the Employment Re-Provision Statement (December 2018) and Section 1 of the Density Management Plan (December 2018) will be revised as follows:

"Hybrid planning application comprising:

- 1. Detailed planning application for Phase 1 with works to include: The proposed demolition of existing buildings and structures, the erection of buildings, including tall buildings, comprising: ~~401~~ 460 residential Units (Use Class C3), ~~3,608~~ 3,493 sqm (GEA) of flexible employment floorspace (Use Classes B1b, B1c,*

⁶ These restrictions are set out in JLL's Addendum Co-Location Report attached as Appendix 5 to this Addendum PDM&ERS (May 2020)

⁷ These restrictions are set out in JLL's Addendum Co-Location Report attached as Appendix 5 to this Addendum PDM&ERS (May 2020)

B2 (restricted) and B8); 230 ~~162~~ sqm (GEA) of flexible retail floorspace (Use Classes A1-A4); a new/altered access road from Dock Road/North Woolwich Road; new streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and servicing spaces; and other works incidental to the proposed development.

2. Outline planning application (all matters reserved) for the phased delivery of the balance of the site for the proposed demolition of existing buildings and structures; the erection of buildings, including tall buildings, comprising: a new local centre; a primary school (Use Class D1); residential and older person units (Use Class C3); flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted) and B8), flexible employment floorspace (Use Classes ~~B1b~~, B1c, B2 and B8); flexible retail floorspace (Use Classes A1-A4); community and leisure floorspace (Use Classes D1 and D2); the construction of a new flood defence wall and delivery of ecological habitat adjacent to the River Thames and associated infrastructure; streets, open spaces, landscaping and public realm (including new park and SINC improvements); car, motorcycle and bicycle parking spaces and servicing spaces; utilities including energy centre and electricity substations; and other works incidental to the proposed development."

4.8 Greater detail on the latest Proposals can be found in the following documents submitted in support of the planning application:

- Design and Access Statement (DAS) Volume 1 (May 2020);
- DAS Volume 2 (December 2018) + DAS Volume 2 Addendum (June 2019) + DAS Volume 2 Addendum (May 2020);
- DAS Volume 3 (May 2020);
- Parameter Plans (May 2020);
- Phase 1 drawings (May 2020); and
- Landscape drawings (May 2020).

4.9 Table A, above, explains which original and addendum documents should now be considered in the determination of the planning application. It should be noted that the documents that have been "struck-through" have been superseded.

Revised Phasing

4.10 Section 3 of the original Planning Statement (December 2018) explains that the land within the Phase 1 area is currently available. This will enable the Phase 1 development (Buildings A and B) and the landscape improvements underneath the flyover and in front of Waterside Studios to be delivered as soon as practically possible.

4.11 The remainder of the land will not be made available for redevelopment purposes until after the Silvertown Tunnel has been constructed or if TfL's contractor reduces its land-take. However, the Applicants have been undertaking discussions with TfL to understand

the parts of the land that will be made available and in which order. The Applicants understand that this land will be progressively be made available starting from Phase 2 and working its way northwards across the Site until all the land becomes available in 2025. This land availability influences the construction phasing of the Proposals.

4.12 Set out overleaf in Figure 18a and Table 2b is an indication of the revised phased delivery of development across the Site area. The amendments are highlighted via strike-through text (deletion) and underline text (additional). It should be noted that this phasing diagram focuses on illustrating the order of the delivery of homes and the amenity spaces (not roads and infrastructure). It does illustrate how the spine road will start to be constructed as part of Phase 4 and how this will be connected to the re-aligned Dock Road to provide residents with access to existing DLR stations and, eventually, to the new on-site DLR station (to be delivered in 2023 / 2024). Greater detail on the construction phasing, including road and infrastructure delivery, can be found in the Construction Logistics Plan (May 2020).

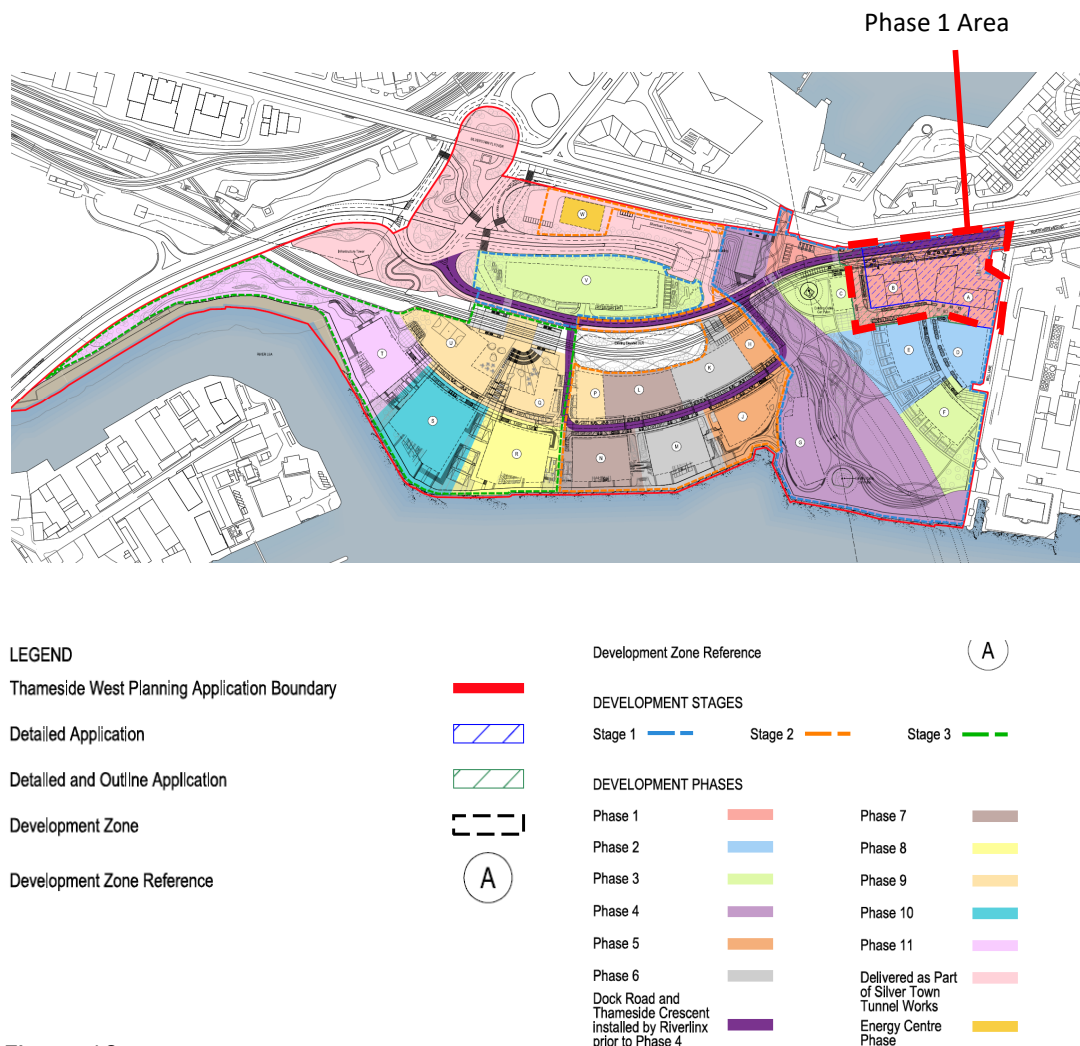


Figure 18a

Table 2b: Indicative Phasing		Blocks	Start on Site	Complete	No. Market Sale homes	No. Affordable Homes	Anticipated Occupation Date	New DLR Station Delivery	Silvertown Tunnel Delivery
Detailed Phase	Phase 1 <ul style="list-style-type: none"> 460 401 residential units 3,417 3,608 sqm GEA of industrial (B1b, B1c, B2 (restricted) & B8) 162 230 sqm GEA of Retail (A1-A4) 	A & B	May Nov 2020	June 2022	206 units	195 units	June 2022		Sept 2021 - Phase 1 Complete October 2021 - Phase 2 Commenced
	Phase 2 <ul style="list-style-type: none"> 589 473 residential units 1,024 833 sqm GEA of industrial (B1b, B1c, B2 (restricted) & B8) 	D & E	Feb 2021	May 2023	126 units	347 units	May 2023	Construction Work Commenced	May 2023 - Phase 3 Commenced
Outline Phases	Phase 3 <ul style="list-style-type: none"> 481 471 residential units 15,000 sqm GEA of industrial (B1b, B1c, B2, B8) 	C, F & V	Dec 2021	April 2024	471 units	0 units	April 2024	Construction Work On-Going	
	Phase 4 <ul style="list-style-type: none"> 320 residential units 1,202 1,247 sqm GEA of retail (A1-A4) 	G	Sept 2022	Sept 2024	320 units	0 units	Sept 2024	2024 (completed)	Dec 2024 (Tunnel Open)
	Phase 5 <ul style="list-style-type: none"> 342 361 residential units 435 414 sqm GEA of retail (A1-A4) 	J & H	July 2023	July 2025	218 units	143 units	July 2025	-	-
	Phase 6 <ul style="list-style-type: none"> 397 412 units 	M & K	June 2024	April 2026	309 units	103 units	April 2026	-	-

Phase 7 <ul style="list-style-type: none"> 493 524 residential units 620 457 sqm GEA of retail (A1-A4) 	N & L	April 2025	July 2027	419 units	105 units	July 2027	-	-
Phase 8 <ul style="list-style-type: none"> 526 542 residential units 1,099 1,084 sqm GEA of retail (A1-A4) 	R	Feb 2026	May 2028	542 units	0 units	May 2028	-	-
Phase 9 <ul style="list-style-type: none"> 474 498 residential units 1,180 1,272 sqm GEA of retail (A1-A4) 4,272 sqm GEA Primary School (D1/D2) 1,800 1,790 sqm GEA of community & leisure uses (D1/D2) 	U, Q & P	Jan 2027	April 2029	255 units	243 units	April 2029	-	-
Phase 10 <ul style="list-style-type: none"> 542 575 residential units 2,170 2,165 sqm GEA of retail (A1-A4) 	S	Jan 2028	May 2030	434 units	141 units	May 2030	-	-
Phase 11 <ul style="list-style-type: none"> 376 423 residential units 500 499 sqm GEA of retail (A1-A4) 5,255 993 sqm GEA Nursery (D1/D2) 	T	April 2029	Feb 2031	0 unit	423 unit	Feb 2031	-	-
Heavy Industrial Phase (HIP) <ul style="list-style-type: none"> 15,000 sqm GEA of industrial (B1b, B1c, B2, B8) 	-	Nov-2029	Nov-2030	-	-	-	-	-

* = Subject to release of Safeguarded Wharf status by the Secretary of State (SOS)

Dwelling Mix & Density

- 4.13 Set out in Table 4a is a comparison between the previous (December 2018) and latest (May 2020) density calculations for the Proposals.

Table 4a: Housing SPG Calculation		
	Previous Density Calculation	New Density Calculation
Gross Site Area	18.79 ha	18.79 ha
Net Site Area (after the commercial % is deducted)	17.568 ha	17.437 ha
Residential GEA*	523,136 sqm (93.5%)	441,141 sqm (92.8%)
Non-Residential GEA	33,864 sqm (6.5%)	33,864 sqm (7.2%)
Number of dwellings	5,000	5,000
Dwelling mix (unit)	Studio: 435	Studio: 418
	1 bed: 1,182	1 bed: 1,141
	2 bed: 2,324	2 bed: 2,295
	3 bed: 989	3 bed: 1,004
	4 bed: 70	4 bed: 142
Number of Habitable Rooms	14,719	14,449
Density	5,000/17.568 ha = 284 u/ha 14,719/ 17.568 ha = 838 hr/ha	5,000/17.437 ha = 286 u/ha 14,445/ 17.437 ha = 828.6 hr/ha

*excluding ancillary car parking and plant areas

4.14 The number of habitable rooms contained within the residential component of the Proposals have been calculated as per Table 4b, below.

Table 4b: Habitable Room Summary		
<u>Private</u>		
<i>Unit Type</i>	<i>Units No.</i>	<i>HR</i>
Studio	362	362
1 bed	858	1,716
2 bed	1,594	4,782
3 bed	482	1,928
4 bed	4	20
	Sub TOTAL	8,808 (61%)
<u>Affordable</u>		
<i>Unit Type</i>	<i>Units No.</i>	<i>HR</i>
Studio	56	56
1 bed	283	566
2 bed	701	2,103
3 bed	522	2,088
4 bed	138	828
	Sub TOTAL	5,641 (39%)
	COMBINED TOTAL	14,449

4.15 The density of the Proposals were calculated in Tables 5 to 8 of the original Planning Statement (December 2018) and in Tables 2 to 5 of the original Density Management Plan (December 2018) using the methodologies listed in paragraphs 3.3.22 and 3.3.23 of the Intend to Publish version of the Draft New London Plan (December 2019). These comprise:

- Bedrooms per hectare;
- Bedspaces per hectare;
- Floorspace Area Ratio (total Gross External Area of all floors / site area); and
- Site Coverage Ratio (Gross External Area of ground floors / site area)

4.16 As a result of the minor change to the dwelling mix identified in Table 4a (above), the abovementioned tables have also been updated in this Addendum PDM&ERS (May 2020) as follows:

Table 5b: Bedrooms per hectare	
Gross Site Area	18.79 ha
Bedrooms	9,729
Density	9,729/18.79 ha = 518 B/ha

Table 6b: Bedspaces per hectare	
Gross Site Area	18.79 ha
Bedspaces	16,990 bed spaces
Density	16,797/18.79 ha = 904 BS/ha

Table 7b: Floorspace Area Ratio	
Gross Site Area	18.79 ha
Residential & Non-Residential Floorspace (GEA) – all floors only (excl. energy centre and basement car parking)	475,005
Density	475,005/18.79 ha = 25,280 fa/ha

Table 8b: Site Coverage Ratio	
Gross Site Area	18.79 ha
Residential & Non-Residential Floorspace (GEA) – ground floor only (incl. energy centre)	59,062 sqm (approx.)
Density	59,062/18.79 ha = 3,143 gfa/ha

4.17 Section 4 of the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018):

- Confirm that all existing buildings found on the Site will be demolished;
- Describe the new river wall proposals;
- Describe the SINC proposals;
- Describe the proposed cycle parking and car parking provisions;

- Describe the proposed layout, massing and character areas. An illustration of the site layout is set out below in Figure 17a below;
- Describe the proposed dwelling mix and affordable housing offer;
- Describe the proposed concept behind the industrial floorspace re-provision proposals (not phasing);
- Describe the proposed retail floorspace and local centre provisions;
- Describe the Primary school, Nursery school and Community floorspace provisions;
- Describe the proposed amenity space provision, public realm and riverside walk provisions; and
- Describe the proposed accessibility and servicing arrangements.



Figure 17a

4.18 Except for amends to the dwelling mix, floorspace areas, phasing, massing of the Proposals, the Class B2 use restrictions, amenity space provisions, car parking provisions and planning obligations amendments (as described below), this Addendum PDM&ERS (May 2020) confirms that the above matters remain unchanged.

Class B2 Use Restriction

4.19 Appendix 1 of the original Planning Statement (December 2018) contained a statement from JLL that provided analysis of the demand for industrial floorspace in the area around the Site, in East London. Attached as **Appendix 5** to this Addendum PDM&ERS (May 2020) is an addendum statement prepared by JLL to confirm that their original analysis and conclusions remain unchanged and provides further examples of other industrial / co-location proposals and how they operate successfully.

4.20 To directly respond to comments made by the GLA, this addendum statement further includes the following restricts for the flexible employment floorspace (Classes B1b, B1c, B2 (restricted) and B8) within Buildings A, B and D, which the Applicants have agreed can be included in a condition(s) if this is deemed necessary:

- The type of Class B2 uses now being proposed within the flexible employment floorspace (Classes B1b, B1c, B2 (restricted) and B8) within Buildings A, B and D; and
- No noise up to LAeq,T 85 dB(A) inside the units which will then be reduced by the mitigation measures described in the Design and Access Statement and Noise & Vibration Assessment.

4.21 It is important to note that the industrial units located within Phase 1 (Buildings A and B) benefit from internal service yard arrangements and noise and vibration suppression measures designed into the Proposals between the industrial and residential elements. This means that these industrial units should not need to be the subject of any additional restrictions on opening hours and servicing operations. As explained in JLL's addendum statement (see **Appendix 5**), any restrictions on opening hours and servicing operations would unnecessarily impact on the future marketability of this 'flexible' industrial floorspace.

4.22 Although the industrial floorspace to be constructed in Phase 2 (Buildings D) will be the subject of the abovementioned Class B2 use and noise restrictions, this floorspace does not benefit from an internal service yard arrangements but will benefit from noise and vibration suppression measures designed into the Proposals between the industrial and

residential elements. Therefore, to directly respond to comments made by the GLA, the Applicants are willing to accept additional restrictions on opening hours and servicing operations that will be applied to the industrial floorspace constructed in Phase 2 (Buildings D), as follows:

- No HGV vehicles to be used during servicing operations; and
- Use of the service yard and the servicing hours are restricted to not between 11pm and 6am.

4.23 In the event that the Proposed Development is approved by the Mayor of London, JLL's addendum statement is to be listed on the decision notice as an 'approved' document and the operational hours, servicing arrangements and noise restrictions (as discussed above) set out in conditions listed on the decision notice.

Energy & Sustainability Strategy

4.24 Details of the Proposed Development's energy strategy and sustainability credentials are set out in the original Energy and Sustainability Statement (December 2018) and Energy and Sustainability Statement Addendum (May 2020).

4.25 The Proposals have been designed to include several sustainable technologies and efficiency measures, as described in the original Planning Statement (December 2018). These remain unchanged, albeit further information on carbon dioxide emissions has been requested by the GLA and is summarised below.

4.26 The Applicants have agreed with the GLA's Energy Team that an energy centre will be provided on-site to serve Phases 4-11 (or alternatives approved energy strategy) and the current public 'network' will serve Phase 1-3 and the on-site energy centre for Phases 4-11 will be able to allow Phases 1 to 3 to connected to it, creating a single network. This approach will result in carbon omissions and the need for carbon offset contributions.

4.27 The carbon emissions for the residential and non-residential elements of the Proposed Development are set out in the Energy & Sustainability Statement Addendum (May 2020), extracts of which are set out below.

4.28 For the detailed residential element (Phase 1), the carbon emissions are:

Residential – Phase 1	Total residual regulated CO ₂ emissions (tonnes per annum)	Regulated CO ₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	424		
Energy Efficiency	381	43	10%
CHP	245	136	32%
Renewable energy	231	14	3%
Total		193	46%

4.29 For the detailed non-residential element (Phase 1), the carbon emissions are:

Non-Residential – Phase 1	Total residual regulated CO ₂ emissions (tonnes per annum)	Regulated CO ₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	99		
Energy Efficiency	72	27	27%
CHP	70	2	2%
Renewable energy	70	0	0%
Total		29	29%

4.30 The carbon emissions figures for the outline part of the Proposed Development have been provided, however, these will need to be revised upon the submission of the reserved matters applications. The Applicants suggest that this provision of further carbon emission information is set out in a condition.

4.31 For the residential element in Phases 2 and 3, which utilise Part L 2013 as they are connecting to an existing heat network, the carbon emissions are:

Residential – Phases 2 & 3	Total residual regulated CO2 emissions	Regulated CO2 emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	871		
Energy Efficiency	786	86	10%
CHP	552	234	27%
Renewable energy	509	42	5%
Total		362	42%

4.32 For the non-residential element in Phases 2 and 3, which utilise Part L 2013 as they are connecting to an existing heat network, the carbon emissions are:

Non-Residential – Phases 2 & 3	Total residual regulated CO2 emissions	Regulated CO2 emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	21		
Energy Efficiency	15	6.3	30%
CHP	14	0.4	2%
Renewable energy	14	0.0	0%
Total		6.8	32%

4.33 For the residential element in Phases 4 and 11, which utilise Part L 2013 as they are connecting to an existing heat network, the carbon emissions are:

Residential – Phases 4 to 11	Total residual regulated CO2 emissions	Regulated CO2 emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	2,993		
Energy Efficiency	2,622	371	12%
CHP	2,622	0	0%
Renewable energy	1,951	671	22%
Total		1,042	35%

4.34 For the non-residential element in Phases 4 and 11, which utilise Part L 2013 as they are connecting to an existing heat network, the carbon emissions are:

Non-Residential – Phases 4 to 11	Total residual regulated CO2 emissions	Regulated CO2 emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	401		
Energy Efficiency	295	105.5	26%
CHP	297	0	0%
Renewable energy	282	15.0	4%
Total		119	30%

4.35 The carbon offset figures for the Proposed Development are set out in the Energy & Sustainability Statement Addendum (May 2020), extracts of which are set out below.

Element	Typology	CO ₂ offset required (1 year)	Cumulative savings for off-set payment (30 years)	Equivalent offset payment to LBN
Phase 1 (Using Part L 2013)	Residential	231	6936	£416,156
	Non-residential	6	178	£10,700
Outline Phases 2 & 3 (Using Part L 2013)	Residential	509	15,282	£916,932
	Non-residential	0.6	18	£1,094
Outline Phases 4-12 (Using Part L at the time of RMA) (currently based on SAP 10)	Residential	1,951	58,527	£3,511,603
	Non-residential	119	639	£38,342

4.36 The above carbon offset contributions for outline phases will be updated on submission of each reserved matters application. These contributions will be the subject of obligations set out in the Section 106 Agreement.

Amenity space provisions

4.37 Paragraphs 4.50 to 4.43 of the original Planning Statement (December 2018) set out the amenity space provision for the original proposals. These provisions are set out in the table below, alongside the amenity space proposals for the current Proposals.

December 2018 Proposals	May 2020 Proposals	Description
36,300 sqm	36,300 sqm	Private amenity space (e.g. balconies, private roof terraces)
24,786 sqm	23,341 sqm	Semi-private amenity space (e.g. podium decks, communal roof terraces);
51,225 sqm	64,445 sqm	Public realm (e.g. riverside walk, park, station square, pocket gardens, pedestrianised areas)
121,346	146,151	
9,035 sqm	22,065 sqm	Enhanced habitat, SINC and intertidal habitat along the river wall

4.38 The residential units within the Proposals will benefit from 36,300 sqm of private amenity space (7.26 sqm per unit) and 87,786 sqm of semi-private and public realm amenity space

(17.55 sqm per unit), as well as 22,065sqm of enhance habitat space that used for visual amenity and education purposes.

- 4.39 The Urban Green Factor (UGF) of the Proposals has been calculated to be 0.4.
- 4.40 Contained within the 90,127 sqm of semi-private communal and publicly accessible spaces across the masterplan, the Proposals include playspace provision in the detailed and outline parts of the Site. The overall playspace provision proposed exceeds the latest GLA playspace calculator requirement, as demonstrated in the table below:

GLA Requirement	Actual Provision	
120.5 children X 10 sqm per child = 1,205 sqm of playspace	Phase 1 1,733 sqm	Formal Play Areas (Podiums) 0-5 years = 1,075 sqm [6yrs+ to be provided in the public park]
1,899.5 children X 10 sqm per child = 18,995 sqm of playspace	Phases 2 to 11 29,559 sqm ⁸	Formal Play Areas (Podiums) 0-5 years = 2,155 sqm (approx.) Formal Play Area (Other – publicly accessible) 0-17 years = 8,284 sqm Informal Play (Publicly Accessible) 0-17 years = 19,120 sqm
Total Required = 20,200		Masterplan Total = 30,634 sqm

- 4.41 The above playspace figures do not take into account the amenity space provision created by the delivery of the riverside walkway, pocket spaces between buildings and the station square which children will also benefits from access to.

Restriction on the Timing of Occupation or Development

- 4.42 Following discussions with the GLA, TfL, the Port of London Authority (PLA) and LBN, the Applicants have agreed to limit the occupation of the number of homes and commencement of phases of the development on the Site as follows:

⁸ To be formally agreed through the submission of reserved matters applications.

- To restrict the occupation of 1,700 homes until the new DLR station on the Site is delivered by TfL;
- To restrict the occupation of homes with Phase 2 to 11 until a 'Primary School Mitigation Plan' is prepared by the Applicants and agreed by LBN (as discussed below);
- No development on the safeguarded Thames Wharf land within the Site until such time as it has been de-designated; and
- The construction and availability for occupations of the industrial floorspace in Building 'V' before the commencement of development in Phase 4.

4.43 All of the abovementioned restrictions will be set out in a Section 106 Agreement which will be signed by the Applicant, the GLA, TfL and LBN.

Primary School Provision

4.44 In terms of primary school demand resulting from the Proposals in comparison to existing primary school capacity, as of 26th March 2020 when the new DfE figures were published, there is no longer enough capacity in existing primary schools to accommodate all of the need for primary school places generated by the entire Proposals when its occupied from 2022 onwards. Therefore, there is need for permanent primary school capacity to be provided off-site or temporarily on-site until the permanent school is delivered on the Site, as explained in Chapter 14 of the ES Addendum (May 2020).

4.45 Following discussions with the GLA and LBN, the Applicants have agreed to provide the following primary school mitigation solution:

- Pay a financial contribution towards increasing permanent off-site primary school capacity to mitigate the need for primary school places generated by the Phase 1 development; and
- To agree 'Primary School Mitigation Plan' is prepared by the Applicants and agreed by LBN prior to the construction of Phases 2 to 11 which sets out how the primary school demand generated by Phases 2 to 11 of the Proposals will be mitigated. This will include options for providing a temporary school on-site and / or through payment of a financial contribution towards increasing permanent off-site primary school capacity. A high-level strategy note on this matter is set out in **Appendix 6** of this Addendum PDM&ERS (May 2020).

4.46 The Applicants have agreed to include the abovementioned primary school mitigation solution in the Section 106 Agreement.

Car Parking Provisions

- 4.47 As a result of continued discussions with TfL, the amount of car parking included within the Proposals has been adjusted. All of the 400 residential car parking spaces across the masterplan are designed to be 'wheelchair accessible' spaces⁹, which equates to a maximum 8% for the 5,000 homes proposed to be constructed.
- 4.48 Initially only 13 (3%) of the residential wheelchair accessible residential car parking spaces for the Phase 1 will be provided for the 401 homes. The remaining 19 spaces (5%) for the Phase 1 will be provided (totalling 8%) should demand arise. This will be set out in a Car Parking Management Plan which ensures:
- That the allocation of spaces is by 'need' and not allocated to a particular home;
 - Reallocation or removal/provision of spaces as and when demand changes; and
 - That matters of management, enforcement and detailed design arrangements are workable.
- 4.49 The decisions on the number of residential wheelchair accessible car parking spaces in outline phases (Phases 2 to 11) would be left until the determination of Reserved Matters Applications and will require provision to be justified at that point, including by reference to the percentage of blue badge holding households in the Borough and in similar schemes/locations in inner London, and in the context of prevailing local, London and national policy and guidance, but to a cap at 8% for the purposes of assessing traffic impact.
- 4.50 Sections 7.03 and 7.04 of the DAS Volume 1 explains that there is capacity for up to 455 residential wheelchair accessible spaces within Phases 2 to 11, however, set out below is a table that confirms the maximum number of car parking that are included within the Proposals:

⁹ Meaning spaces that are referred to as disabled persons' parking in Policy T6.1(G) and paragraph 10.6.9 of the ITP Draft London Plan

Plots	Podium Parking	On-street / at Grade	Total
Residential			
Buildings A&B (wheelchair accessible)	13	19 ¹⁰	32
Buildings CDEF (wheelchair accessible)	76	-	76
Buildings G & J (wheelchair accessible)	44	-	44
Buildings PLKH (wheelchair accessible)	49	-	49
Buildings M&N (wheelchair accessible)	28	14	42
Buildings QSRT &U (wheelchair accessible)	157	-	157
Sub-total			400
Non-residential			
Commercial (wheelchair accessible)	-	13	13
Industrial - Building V (wheelchair accessible)	-	11	11
School / Nursery (wheelchair accessible)	-	5	5
Car club (wheelchair accessible)	-	6	6
General Purpose Blue Badge Parking	-	4	4
Service bays / Drop-off (wheelchair accessible)	-	12	12
Drop-off only spaces (wheelchair accessible)	-	2	2
Sub-total			53
TOTAL within the TSW Scheme			453
Re-provision of other spaces for other existing Uses			
Waterside Studios (up to ¹¹)	-	57	57
Silvertown Tunnel DCO / Energy Centre	-	23	23

4.51 The 11 car parking spaces associated with the large industrial building (Building 'V') will all be wheelchair accessible. All of these parking spaces are required from 'marketability' and 'operations' reasons, as explained below:

- From a marketability perspective, the Co-Location prepared by JLL (attached as Appendix 1 of the Planning Statement (December 2018)) explains that a 'typical specification' for a new standard industrial units includes a car parking ratio of 1 space per 1,250sqft. The car parking provision for Building 'V' is already significantly below this ratio;
- From an operational perspective, JLL consider it necessary to provide car parking to enable night-time shift working to take place and to ensure the safety of staff. The parking will be provided for staff that will not benefits from access (or significantly reduced access) to public transport.

¹⁰ Of the 32 residential car parking spaces within the Phase 1 site area, 19 spaces are temporary. These 19 spaces will be re-located into the basement area of Phase 2. The 368 residential car parking spaces indicated for Phase 2 to 11 only do not include the 19 re-located phase 1 spaces to ensure there is no double counting of these spaces

¹¹ These spaces are shown indicatively on the drawings and are subject to the Legal Agreement between Riverlinx with Waterside Studios. This is the maximum amount shown on the drawings, but less spaces can be delivered if this is agreed between Riverlinx with Waterside Studios.

4.52 The drawings submitted in support of the Proposals illustrate:

- 17 x car parking spaces to be used in conjunction with the operation of the Silvertown Tunnel DCO which have already secured development consent (see **Appendix 7**); and
- 57¹² x car parking spaces to be used in conjunction with the Waterside Studio spaces. These are replacement spaces for those that will be displaced on behalf of Riverlinx by the Proposals and the Silvertown Tunnel DCO.

4.53 All of the abovementioned car parking spaces are still required. The Applicants' Section 106 agreement will include a provision that ensures that if these spaces are removed/repurposed when the relevant lease(s) terminate(s), other than a small number of blue badge spaces.

Phase 1 - Temporary Works

4.54 The temporary and permanent ground floor drawings for Phase 1 have been designed to be consistent with each other where they overlap. Where the elements of the temporary and permanent ground floor drawings are inconsistent (namely the parking area to the rear of Buildings A and B), the temporary solution (if constructed) will be replaced by the permanent solution which will be constructed at the same time as Phase 2.

4.55 The proposals for Phase 2 are also current consistent with the permanent solution for Phase 1. In the event that the Phase 2 proposals change as a result of further reserved matter application (RMA) discussions, resulting in the need for Phase 1 to be adjusted, this will be resolved by securing agreement from LBN through determination of a non-material or minor material amendment application(s).

North Woolwich Road Cycle Lane

4.56 The Proposals have been designed to enable TfL / LBN to construct a new cycle lane along the southside of North Woolwich Road / Dock Road. These works are not being undertaken by the Applicants but will be secured through a Section 278 Agreement. The Phase 1 drawings to be formally approved through this planning application do not show this cycle lane. They will only show the Phase 1 proposals and the any temporary Section 278 works that will be implemented ahead of the cycle lane works.

¹² These spaces are shown indicatively on the drawings and are subject to the Legal Agreement between Riverlinx with Waterside Studios. This is the maximum amount shown on the drawings, but less spaces can be delivered if this is agreed between Riverlinx with Waterside Studios

- 4.57 Although the cycle lane will not be shown on the Phase 1 approved drawings, it is illustrated in the masterplan drawings contained within the DAS to explain how this cycle lane will be implemented in the context of the Phase 1 proposals in the future.

Planning Obligations

- 4.58 The May 2020 amendments to the Proposals include legal obligations offered by the Applicants. Although a number of these obligations were being discussed between LBN, the GLA, TfL and the Applicants following the submission of the second (June 2019) set of amendments to the Proposals, however LBN determined the planning application before these legal obligations could be agreed. These obligations have now been agreed and, therefore, constitute a material consideration that overcome some of LBN's fifteen reasons for refusal. Set out below is a summary list of the main obligations agreed at the time of submitting this Addendum PDM&ERS (May 2020):

Affordable Housing:

- Provision of on-site affordable housing at [% on a habitable room basis] to be provided in accordance with an agreed mix of London Affordable Rent (LAR) units and London Shared Ownership units;

Health:

- A £7,777,542 contribution to assist in funding the works required for Albert Road GP Practice;

Education:

- A £13,591,105 contribution towards secondary school places;
- Pay a financial contribution [£ is tbc] towards increasing permanent off-site primary school capacity to mitigate the need for primary school places generated by the Phase 1 development;
- To agree 'Primary School Mitigation Plan' is prepared by the Applicants and agreed by LBN prior to the construction of Phases 2 to 11 which sets out how the primary school demand generated by Phases 2 to 11 of the Proposals will be mitigated;

Transport Related Obligations:

- A £6,500,000 contribution towards delivery of Thames Wharf Station;
- A £2,750,000 contribution towards improvements to Canning Town internal interchange;

- To restrict the occupation of 1,700 homes until the new DLR station on the Site is delivered by TfL;
- A contribution [£ is tbc] towards pedestrian way finding and signage scheme;
- A £30,000 contribution towards bus stop improvements along Dock Road / North Woolwich Road;
- A £220,000 contribution cap towards one cycle hire docking station, and safeguarding land for a total of two docking stations;
- Area of land on the west part of the site (adjacent to river wall) to be safeguarded to facilitate a pedestrian bridge crossing landing point over Bow Creek to Trinity Buoy Wharf;
- Provision and safeguarding of the riverside walk for public access;
- Area of land to be safeguarded for a future riverboat mooring or river pier point (to be shown on Safeguarded Land Plan);

Safeguarded Wharf:

- No development on safeguarded Thames Wharf land on the Site until such time as it has been de-designated;

Public Open Space:

- Provision of a public park and publicly accessible Riverside Walkway;
- Not to Occupy any residential unit in any building unless and until the relevant public realm associated with that building as set out in the relevant approved public realm provision scheme has been completed to LBN's satisfaction;

Community Uses:

- A covenants that the Community Sports Space shall be available for use by the public outside of school hours;
- Not to occupy any of the residential units in Phase 1 of the Development until the ancillary Creche, Community Hall, Residents Meeting Room, Residents Gym has been Practically Completed;

Industrial Uses:

- The construction and availability for occupation of the industrial floorspace in Building 'V' before the commencement of development in Phase 4;

Local Labour via Workplace:

- Reasonable endeavours shown to secure Newham residents to occupy 35% of construction phase jobs;

- Reasonable endeavours shown to secure Newham residents to occupy 50% of end user jobs;
- Apprenticeships targets;

Design:

- The instruction of an Architectural Design Champion; and
- Commitment to ensure the Design Review of RMA's for later phases.

4.59 The precise list of obligation and their details, including trigger point for these obligations, will be set out in the Section 106 Agreement. The above listed of obligations do not include the financial contributions made in respect of the Mayoral and LBN Community Infrastructure (CIL)¹³ and Carbon Offset Contributions which are substantial.

¹³ Estimated to be in the region of £30m+

5.0 Planning Policy Context & Reasons for Refusal

5.1 Section 5 of the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) explain that:

- In accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 (PCPA) the hybrid planning applications is to be determined in accordance with the provisions of the 'Development Plan' unless other 'material considerations' indicate otherwise;
- At the time of preparing the planning application in December 2018 there were a number of documents that constituted the Development Plan. These comprise:
 - London Plan (March 2016);
 - Newham's Local Plan - The Core Strategy (January 2012) & Proposals Map; and
 - Newham's Local Plan - Detailed Sites and Policies DPD (October 2016).

5.2 Section 5 of the original Planning Statement (December 2018) and the Employment Re-Provision Statement (December 2018) and Section 2 of the Density management Plan (December 2018) also set out:

- The key adopted planning policies of the London Plan and LBN's Development Plan Documents that are relevant to the Proposed Development; and
- The documents and policies that at the time of preparing these Statements carried 'significant weight' in the determination of the planning application on the basis that they represent Central Government's policy position on sustainable development; the GLA's and LBN's 'direction of travel'; and they have been the subject of public consultation and / or Examination by an Inspector. These documents comprised:
 - National Planning Policy Framework (NPPF, 2012) & associated National Planning Policy Guidance (NPPG);
 - Draft Newham Local Plan Review (Proposed Submission (Nov 2017) consolidated with Proposed Minor Amendments (Feb 2018) and Post-Submission Minor Amendments (June 2018));
 - Lower Lea Valley Opportunity Area Planning Framework (OAPF, 2007)¹⁴;

¹⁴ In 2007 the MOL published the Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF). The Site is identified in this document for retained as a Strategic Employment Location (SEL), a Safeguarded Wharf, within an area safeguarded for the Silvertown Tunnel River Crossing and a potential location for a new DLR station. However,

- Draft New London Plan, Showing Minor Suggested Changes (August 2018)¹⁵; and
- The Working Draft Royal Docks & Beckton Riverside Opportunity Area Planning Frameworks (RB&BR OAPF).

5.3 This Addendum PDM&ERS (May 2020) highlights that since the submission of the planning application in December 2018, a new NPPF was published in February 2019. The previous NPPF (2012) has now been superseded and therefore no longer carries any material weight in the determination of the hybrid planning application.

5.4 LBN has also adopted the Newham Local Plan (2018). This means that the LBN's previously adopted Local Plan - The Core Strategy (January 2012), its Proposals Map and Newham's Local Plan - Detailed Sites and Policies DPD (October 2016) have now been superseded and therefore no longer carry any material weight in the determination of the hybrid planning application.

5.5 The Draft London Plan has now completed its Examination in Public (EiP) and the MOL has published the "Intend to Publish" Draft London Plan (December 2019). On 13 March 2020, the Secretary of State issued a set of Directions¹⁶ under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to the application, have been taken into account as a material consideration.

5.6 In light of the above adjustment in policy context, this Section of the Addendum PDM&ERS (May 2020) explains what should now be regarded as the Development Plan and which documents are regarded as a material consideration to the determination of the planning application.

The Development Plan

5.7 The Development Plan currently comprises:

- London Plan, consolidated with alterations since 2011 (March 2016) (the "London Plan");
- Newham Local Plan (2018); and
- Newham Local Plan Policies Map (2018).

the LLV OAPF is an out-of-date document and the GLA's website indicates that the LLV OAPF is no longer relevant to the Royal Docks area. The GLA has now prepared the 'Working Draft Royal Dock & Beckton Riverside Opportunity Area Planning Framework (RD&BR OAPF, March 2016) for the area.

¹⁵ The GLA confirmed at the time that this draft document was to be used for the determination of all planning applications.

¹⁶ see <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/secretary-states-response>

5.8 The policies and guidance contained with the following documents are regarded as 'material' considerations that carry significant weight:

- NPPF & NPPG (2019);
- Lower Lea Valley Opportunity Area Planning Framework (OAPF, 2007)¹⁷; and
- Intend to Publish Draft New London Plan (December 2019) (the "ITP Draft London Plan").

Site Specific Designations

5.9 The Site is located within the Arc of Opportunity and the Royal Docks & Beckton Riverside Opportunity Area¹⁸. Page 369 of the London Plan explains that there is capacity for 11,000 new homes (minimum) and 6,000 new jobs in the Royal Docks and Beckton Waterfront area. Table 2.1 of the ITP Draft London Plan increases these capacity levels to 30,000 new homes and 41,500 new jobs in the Royal Docks and Beckton Riverside Opportunity Area.

5.10 The Development Plan confirms that the Site is designated as follows and as illustrated in Figure 22a (overleaf):

- Strategic Site Allocation S08;
- Strategic Site Allocation S09;
- Part of a Strategic Industrial Location (SIL);
- Within the Silvertown Crossing Safeguarding Area;
- Thames Estuary (TE) 2100 Flood Defence Safeguarding Area;
- Safeguarded Wharf;
- Part of the Crossrail Safeguarding Area;
- Part of a Site of Importance of Nature Conservation (SINC);
- New DLR Station;
- Employment Hub;
- The Cable Car Safeguarding Area;
- Air Quality Management Area (AQMA);

¹⁷ In 2007 the MOL published the Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF). The Site is identified in this document for retained as a Strategic Employment Location (SEL), a Safeguarded Wharf, within an area safeguarded for the Silvertown Tunnel River Crossing and a potential location for a new DLR station. However, the LLV OAPF is an out-of-date document and the GLA's website indicates that the LLV OAPF is no longer relevant to the Royal Docks area. The GLA then prepared the 'Working Draft Royal Dock & Beckton Riverside Opportunity Area Planning Framework (RD&BR OAPF, March 2016) for the area. This document is no longer regarded as carrying any weight in the determination of planning applications.

¹⁸ *ibid*

- Archaeological Priority Area (Tier 3); and
- A mooring point that is protected for future river bus services.

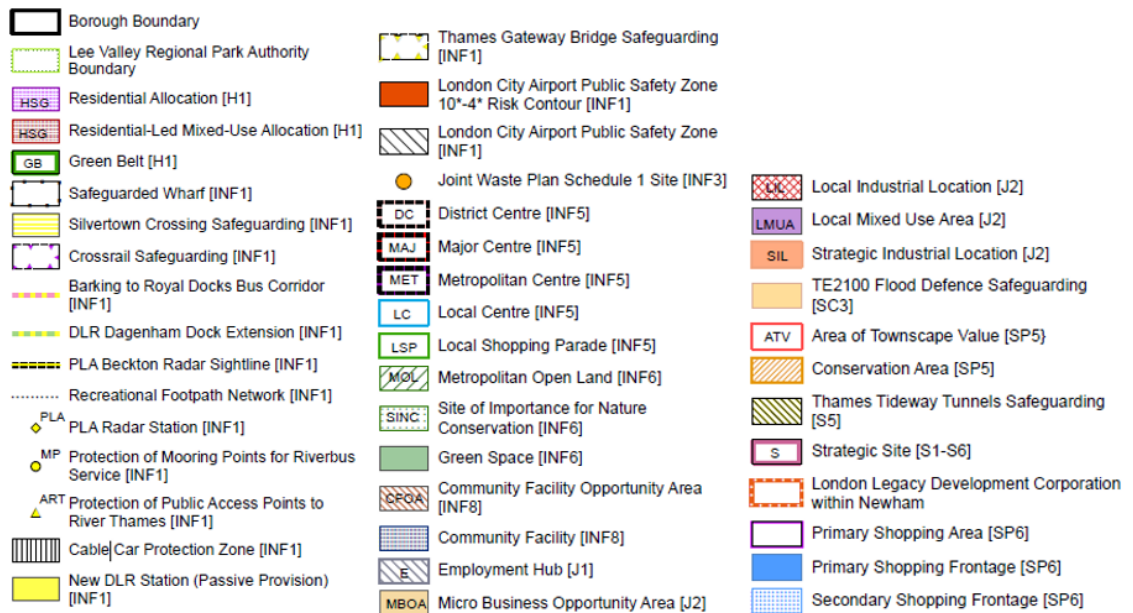
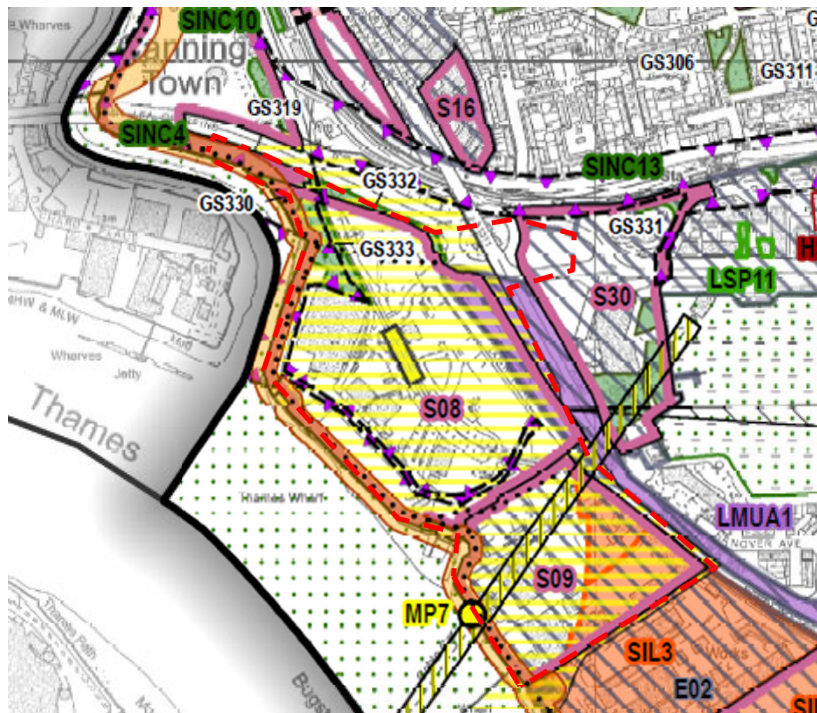


Figure 22a: Extracts of Newham Local Plan Policies Map & Key

- 5.11 The Site is also located within Flood Zones 2 and 3, within the Thames Policy Area and within or adjacent to the future Public Safety Zone (PSZ) and Obstacle Limitation Surface (OLS) associated with London City Airport.
- 5.12 The whole of the riverfront within the Site is designated for recreational footpath / cycle network.
- 5.13 The Newham Local Plan allocates Thames Wharf for SIL release for mixed use development (S08) and also considers a new strategic site allocation (Silvertown Landing – S09) for part retention of SIL and part mixed-use development on the remainder of the Site.
- 5.14 Site Allocation S08 seeks the delivery of the following:

“There is scope to consolidate the safeguarded wharf at Central Thameside West (Royal Primrose Wharf) and subsequently to remove the wharf safeguarding at Thames Wharf subject to there being no net loss of functionality or wharf capacity. This and Managed Release from SIL (see Policy J2) could provide the opportunity to develop a new neighbourhood, comprising new residential and community uses including a school, and employment, leisure/ tourism grouped around a new DLR station and Local Centre, well connected by pedestrian and cycle links. Continuous riverside access; links to the Lea River Park and across to Trinity Buoy Wharf, to



Royal Victoria and West Silvertown DLR stations and Canning Town centre; North Woolwich Road active street improvements; and appropriate connectivity and integration with adjacent Silvertown Landing strategic site will be secured. Indicative building heights of 10 to 12 storeys with buildings of up to 18 storeys at key locations.

See also Policies S1, S3, S4, SP4, SP6, SP7, SP9, J2, INF1, INF2, INF3, INF4, INF5, INF6, INF7, INF8 and INF9.”

5.15 Site Allocation S09 seeks the delivery of the following:

"Mixed use consolidating the community centred on the new DLR station at Thames Wharf on the western part of the site through Managed Release of SIL, and employment/strategic infrastructure development at the east of the site, where the functionality and capacity of the SIL will be protected securing buffering of both new and existing SIL and strategic infrastructure with possible scope for further limited release via Managed Intensification as per J2. Employment uses on the SIL should include modern industrial and warehousing, but may also link to the adjacent LMUA, with the scope to secure Managed Intensification (as per J2) and further release if new



formats are realised, reducing the spatial footprint whilst achieving the same capacity, functionality and ability to respond to industrial and warehousing demand. The Managed Release of the western part of the site for mixed use will secure an appropriate transition from SIL and strategic infrastructure and include residential uses, green and community infrastructure meeting local need, and employment generating uses. Convenient and comfortable connections to the DLR stations at West Silvertown, Thames Wharf and Royal Victoria, and along and across North Woolwich Road will be improved as will pedestrian and cycle links through to and along the river (where public space will open out) and docks and to nearby local centres and Canning Town centre. Indicative building heights of 10 to 12 storeys with buildings of up to 18 storeys at key locations.

See also Policies S1, S3, SP4, SP7, SP8, SP9, J1, J2, H3, INF1, INF2, INF4, INF6, INF7, INF8 and INF9."

Other Guidance Documents

5.16 In addition to the above, regard will need to be had to other "material considerations" including guidance contained within:

LBN's Supplementary Planning Guidance (SPG) on:

- The control of dust and emissions during construction and demolition (July 2014); and
- Land for Industry and Transport (September 2012).

GLA's SPGs on:

- Housing SPG (March 2016);
- Affordable Housing and Viability (August 2017);
- Social Infrastructure (May 2015);
- Sustainable Design and Construction (April 2014);
- Play and Informal Recreation (September 2012);
- Character and Context (June 2014);
- Green Infrastructure and Open Environments SPG (2012); and
- Practice Note on Industrial Intensification and Co-location Through Plan-Led and Masterplan Approaches (November 2018).

5.17 Given the Site's partial designation as a Safeguarded Wharf, it is relevant to note that the MOL has also published a 'Safeguarded Wharf Review 2018' and which was the subject of a 3-month public consultation in the summer of 2018. In response to matters raised, the Mayor is proposing minor changes to the boundaries of some wharves within the network. The Mayor issued the 'Safeguarded Wharves Review 2018 – Round Two Consultation' for a six week public consultation that closed on Wednesday 2 October 2019.

5.18 The Mayor is currently considering the round two consultation responses received and will submit his recommendations for safeguarding to the Secretary of State (SoS). It will then be for the SoS to determine which wharves he chooses to retain. The timetable for this is not known at the time of writing this Statement.

5.19 The MOL's Safeguarded Wharves Review seeks to release the Safeguarded Wharf status of Thames Wharf on the basis that it is to be consolidated into the Peruvian Wharf and Royal Primrose Wharf, resulting in no net loss of Wharf capacity (see extract found at Appendix 4 of the original Planning Statement (December 2018)). Through consultation in respect of the Operational Works Development application, the Port of London Authority (PLA) highlighted its support for the wharf consolidation proposal set out in the Safeguarded Wharves Study, and the GLA have recognised it as the "indicative direction of travel for this site". Notwithstanding, it is not yet clear when this consolidation will be

formalised by the SoS. It is therefore necessary to consider the impact of the Proposals on the long-term viability of the Safeguarded Wharf for waterborne freight handling.

Planning Considerations

5.20 Section 5 of the original Planning Statement (December 2018) explained that in light of the above policy context, following discussions with LBN, the GLA and other consultees, the key planning considerations relevant to the determination of the planning application can be divided into six categories. These categories are then discussed in Sections 6 to 11 of the original Planning Statement (December 2018).

5.21 Table 9a below summarises these considerations and highlights which Sections of the original Planning Statement (December 2018) they are discussed (and assessed) and updated in this Addendum PDM&ERS (May 2020). This Table also highlights which Sections of this Addendum PDM&ERS (May 2020) considers LBN’s suggested fifteen reasons for refusal (RfR) and explains why these reasons are unsound in strategic planning terms.

Table 9a: Original Planning Statement (Dec 2018)		Addendum PDM&ERS (May 2020)	Reasons for Refusal (RfR) Discussion
1. <u>Principle of Development (Part 1) – Demolition & Temporary Loss of Employment</u> <ul style="list-style-type: none"> • Is the temporary loss of existing occupiers of the Site acceptable? • Is the demolition of the existing buildings acceptable? <p style="text-align: center;">PTO</p>	Section 6	Section 6	N/A

Table 9a: Original Planning Statement (Dec 2018) Contin...	Addendum PDM&ERS (May 2020)	Reasons for Refusal (RfR) Discussion	
<p>2. <u>Principle of Development (Part 2) – Land Use</u></p> <ul style="list-style-type: none"> • Will the principle of the Proposals be acceptable with regard to the Site’s SIL/Employment Hub designation? • Will the Proposals have an unacceptable detrimental impact on the following designations: <ul style="list-style-type: none"> ○ Opportunity Area; ○ Safeguarded Wharf; ○ The delivery of the Silvertown Tunnel; ○ DLR station Platform and tracks; ○ Crossrail Services; ○ Emirates Cable Car; ○ River bus Services; ○ Flood Protection Measures; ○ Ecology (SINC); ○ The Public Safety Zone (PSZ) and Obstacle Limitation Surface (OLS) associated with London City Airport; and ○ New Future Bridge Link. 	Section 7	Section 7	RfR No. 3 RfR No. 5
<p>3. <u>Scale, Design & Appearance</u></p> <ul style="list-style-type: none"> • Will the design of the proposal (including tall buildings) be appropriate for its context? 	Section 8	Section 8	RfR No. 1 RfR No. 6 RfR No. 11
<p>4. <u>Affordable, Family and Specialist Housing & Development Management Considerations</u></p> <ul style="list-style-type: none"> • Will the Proposals deliver the maximum reasonable amount of affordable housing? • Will the Proposals deliver family homes and specialist homes? • Will the Proposals deliver a high-quality living environment? • Will the Proposals result in an unacceptable impact on neighbouring sites? • Will the Proposals meet the objectives of development control policies? 	Section 9	Section 9	RfR No. 4 RfR No. 7 RfR No. 8 RfR No. 9 RfR No. 10 RfR No. 12
<p>5. <u>Environmental Impact Considerations</u></p> <ul style="list-style-type: none"> • Will the Proposals result in any unacceptable environmental impacts? 	Section 10	Section 10	RfR No. 2 RfR No. 13 RfR No. 14 RfR No. 15
<p>6. <u>Regeneration Benefits & Planning Balance</u></p> <ul style="list-style-type: none"> • Will the Proposals deliver regeneration benefits that are a significant material planning consideration? • Is there are presumption in favour of the Proposals? 	Section 11	Section 11	N/A

6.0 Principle of Development (Part 1) – Demolition & Temporary Loss of Employment

6.1 Section 6 of the original Planning Statement (December 2018) considers the acceptability of the Proposals in respect of adopted and emerging policy and guidance relating to:

- a) The temporary loss of the existing occupiers; and
- b) The demolition of the existing buildings on the Site.

6.2 It concluded that the Proposals are supported by Development Plan policy and the benefits of the Proposal, including:

- The Silvertown Tunnel Development Consent Order (DCO) will result in the majority of the Site becoming vacant (except the ASD land);
- A relocation strategy for ASD is to be agreed by the Applicants and, to be submitted and approved by Newham Council;
- The consented Operational Works Development (reference: 17/02554/FUL) has secured planning permission for the demolition of the Silver Building which is currently only in 'meanwhile use'; and
- The Proposal will result in the long-term re-provision of employment floorspace and job creation.

6.3 This Addendum PDM&ERS (May 2020) confirms that the above conclusions¹⁹ do not change as a result of the first (May 2019), second (June 2019) and third (May 2020) set of amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as Section 6 of the original Planning Statement (December 2018):

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments);
- Demonstrated how the Proposals would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments); and
- Considered how the Proposals accord with Draft London Plan policy²⁰.

¹⁹ A relocation strategy for ASD to be agreed with LBN is no longer required on the basis that the Applicants now own the ASD land and ASD have now found a new site to relocate to.

²⁰ Which has gone on to become the ITP Draft London Plan

7.0 Principle of Development (Part 2) – Land Use

7.1 Section 7 of the original Planning Statement (December 2018) and Section 6 of the original Employment Re-Provision Statement (December 2018) consider the acceptability of the Proposals in respect of:

- a) The Site's land use designations relating to following parts of the Site;
 - Thames Wharf and Island Site; and
 - Carlsberg-Tetley (also known as Silvertown Land).

- b) The other designations that relate to the Site, including:
 - LBN's Arc of Opportunity;
 - Royal Docks & Beckton Riverside (RDBR) Opportunity Area;
 - Safeguarded Wharf;
 - Crossrail;
 - The Silvertown Crossing (the Silvertown Tunnel);
 - A potential new DLR Station at Thames Wharf;
 - Emirates Airline Cable Car;
 - A Future Mooring Point for River Bus services;
 - Flood Protection Measures;
 - Ecology (SINC);
 - The Public Safety Zone (PSZ) & Obstacle Limitation Surface (OLS); and
 - New Future Bridge Links.

7.2 These original Statements (December 2018) conclude that there are no detrimental site allocation related impacts resulting from the Proposals that will mean that the scheme should not be supported by LBN or the GLA.

7.3 Appendix 1 of the original Planning Statement (December 2018) contained a statement from JLL that provided analysis of the demand for industrial floorspace in the area around the Site, in East London. Attached as **Appendix 5** to this Addendum PDM&ERS (May 2020) is an addendum statement prepared by JLL to confirm that their original analysis and conclusions remain unchanged. As explained in paragraphs 4.20 above, at the request of the GLA, this addendum statement further restricts the type of Class B2 uses and noise levels within the flexible industrial units within Phases 1 and 2 of the Proposals (Buildings A, B and D) as well as further restrictions for Building D in respect of its operational hours and external service yard arrangements.

7.4 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the first (May 2019), second (June 2019) and third (May 2020) set of the amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as the original Planning Statement and Employment Re-Provision Statement (December 2018):

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments); and
- Considered how the Proposals accord with Draft London Plan policy.

7.5 Material changes in circumstances to consider since the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) comprise:

- 1) The conclusions of the GLA's Stage I Response (dated 29th April 2019); and
- 2) LBN's suggested fifteen reasons for reasons for refusal.

7.6 These matters are considered in greater detail below.

The GLA's Stage I Response

7.7 The GLA's Stage I Response concludes in land use terms that:

"The release of the non-designated industrial land within the site for mixed use meets the requirements of the Local Plan site allocation and is supported in line with London Plan Policy 4.4 and draft London Plan Policy E7" (Paragraph 51)

"... in this instance the dedicated multi-level building with 15,000sqm of SIL-type uses proposed in between the DLR viaduct and the entrance to the Silvertown Tunnel will ensure that there will be an overall increase in industrial floorspace capacity within an area that is proposed as SIL and would genuinely function as such. It is considered therefore to be an innovative approach to ensure that in overall terms there will be a net increase in SIL industrial floorspace capacity... officers consider the proposed space responds appropriately to Site Allocation S09, as a new format that reduced the spatial footprint, whilst achieving increased capacity, functionality and ability to respond to industrial and warehousing demand" (Paragraph 57)

"Subject to amendment of the industrial Use Classes proposed, and further discussions regarding the timing of delivery of the new DLR station, the school and replacement SIL-type and light industrial space; the proposed high-density and mixed-use development, including high quality replacement industrial space, in supported in principle" (paragraph 67)

7.8 The conclusions of the GLA's Stage 1 Response and the Applicants' broad agreement to amend the Proposals accordingly were highlighted to LBN in the Addendum PDM&ERS (June 2019).

7.9 The following directly respond to the GLA's land use recommendations, as set out in its Stage I Report:

- The alteration to the phasing of the Proposals to bring the industrial phase forward and occupation restrictions (see Figure 18a, Table 2b and paragraph 4.42 of this Addendum PDM&ERS (May 2020));
- The amendments to the description of development (see paragraph 4.7 of this Addendum PDM&ERS (May 2020));
- Clarification on the delivery of the primary school provision (see paragraphs 4.44 to 4.46 and Appendix 6 of this Addendum PDM&ERS (May 2020)); and
- The alteration to the industrial (Class B) Use Classes proposed and operational restrictions (see paragraphs 4.19 and 4.23 of this Addendum PDM&ERS (May 2020)).

LBN's Suggested Reasons for Refusal

7.10 The two reasons for refusal suggested by LBN that relate to 'land use' are set out below:

Reason for Refusal No 3:

3. The proposed development introduces residential uses into a designated Strategic Industrial Location (SIL) and has failed to adequately demonstrate managed release and managed intensification. The proposals are therefore considered to erode the existing industrial quality of designated SIL and would be harmful to the supply of SIL and employment land across the Borough. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 2.17, 4.1 and 4.4 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*

- *Policies E4, E5 and E7 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies S1, S3, S4, J1 and J2 of the Newham Local Plan (December 2018).*

Reason for Refusal No 5:

5. *The proposed development has not given due regard to masterplanning and infrastructure sufficiency in the potential scenario of Thames Wharf remaining safeguarded. In this respect the proposals are considered to be premature in nature. This is contrary to:*

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 1.1 and 7.26 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies S1, S3, S4, INF1 and INF9 of the Newham Local Plan (December 2018).*

7.11 These suggested reasons for reasons for refusal specifically related to managing the release and intensification of the SIL found on the eastern part of the Site and safeguarding the land currently used as a Wharf (i.e. Thames Wharf) in the event that its Safeguarded Wharf status is not removed by the SOS.

7.12 These suggested reasons for refusal are regarded by the Applicants to be 'unsound' on the basis that:

- The Proposals have appropriately managed the release and intensification of the SIL part of the Site and is supported by the GLA's Stage I Response (as explained in paragraphs 7.7 of this Addendum PDM&ERS (May 2020)); and
- The Applicants have agreed to a Grampian condition that will prohibit development within Phases 5 to 11 until the Safeguarded Wharf status of Thames Wharf is removed. In the event that this is not removed, this Grampian condition requires the submission of a new Masterplan that demonstrated how the Safeguarded Wharf operation can remain in place (as explained in paragraphs 4.42 and 4.58 of this Addendum PDM&ERS (May 2020)).

8.0 Scale, Design & Appearance

8.1 Section 8 of the original Planning Statement (December 2018) considers the appropriateness of the Proposals in respect of its scale (including Tall Buildings), design and appearance for the Site. It concluded²¹ that:

- The Site is physically and characteristically separated from the rest of LBN. The scale of the Site and its riverside location mean that it is capable of both creating and supporting a new and improved character for the area. When these attributes are combined with its high accessibility level and the emerging tall buildings context in this riverside location, the Site benefits from a significant amount of potential to create its own identity in the 'place hierarchy' of LBN and delivering a 'high density character' that will reflect its 'gateway' location status (as discussed in the Tall Buildings Justification Statement (May 2019));
- LBN's Officers, LBN's DRP and the GLA's Officers agree that the Site is an appropriate location for high-quality mixed-use development that contains tall buildings. They also agree that, notwithstanding massing, the general layout, character areas and building typologies are appropriate and that the finer details can be secured by reserved matters applications following a set of clear Parameter Plans and Design Codes. The matter that requires further justification is the amount and height of the tall buildings proposed beyond LBN's suggested indicative height guidance (of 10 to 12 storeys with instances of 18 storeys);
- The scale, design and appearance of the Proposals can be supported in view of the Site's accessibility, scale and riverside setting and its existing physical separation from the rest of Newham. It can create a new character area that will complement LBN's place hierarchy strategy and knit the Site and this part of the RDBR Opportunity Area back into Newham (as discussed in the Tall Buildings Justification Statement (May 2019) and Independent Tall Buildings Statement (December 2018));
- It is important to note that a significantly greater number of benefits can be delivered on the Site from the Applicants' Proposals because it is able to deliver its full development potential (as discussed in Section 11 of the original Planning Statement (December 2018));
- The Site and Proposal must deliver this form of development, rather than providing a more homogenous solution that does not set itself apart from any other modern

²¹ With reference to the DAS Volumes I to III (December 2018), the Tall Building Justification Statement (December 2018), the Independent Tall Buildings Statement (December 2018) and the Townscape & Visual Impact Assessment (Chapter 17 and Volume 2 of the ES (December 2018))

development across London and is unable to deliver the full potential of public benefits from the Site (as discussed in the Independent Tall Buildings Statement (December 2018) and Townscape & Visual Impact Assessment included in Volume 3 of the ES)); and

- With London's population expected to increase by 70,000 every year, reaching 10.8 million in 2041, it is vital that proposals like these are supported to tackle the housing crisis and to make the most of precious land in the Capital in areas with the best transport links. The Site is the ideal location for the scale and amount of development proposed by the Applicant's masterplan.

8.2 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the first (May 2019), second (June 2019) and third (May 2020) set of amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as the original Planning Statement (December 2018):

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments); and
- Considered how the Proposals accord with Draft London Plan policy.

8.3 Material changes in circumstances to consider since the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) comprise:

- 1) The conclusions of the GLA's Stage I Response; and
- 2) LBN's suggested fifteen reasons for refusal.

8.4 These matters are considered in greater detail below.

The GLA's Stage I Response

8.5 The GLA supports the scale and appearance of the original Proposals (December 2018). They advise in their Stage 1 report that:

"The Design and Access Statement sets out how development could come forward within the Parameter Plans and Design Codes. This demonstrates the potential for a high-quality scheme to come forward" (paragraph 97)

"...as discussed in this report, the proposals are considered to be of a good design and residential quality. The proposed density is therefore supported" (paragraph 106)

"The tallest buildings (controlled by a Parameter Plan) serve to mark key locations, including 'Station Plaza Gateway' linking to the Thames Focal Point'; at the former wharf entrance on the Thames; at the entrance point to the site from Royal Victoria Dock; and along Dock Park" (paragraph 111)

"The larger scale of the site and its massing will assist in wayfinding and contribute positively to the legibility of the townscape in an area that is currently fragmented by transport infrastructure. The massing and layout also allows physical and visual permeability through the site towards the Thames, both through the proposed buildings and by the creation of substantial areas of new publicly accessible open space. The scale also creates a sympathetic transition between the much larger scale emerging nearby in the Isle of Dogs and Greenwich Peninsula" (paragraph 111)

"For the detailed application, the industrial architecture precedents referenced, and the use of robust brick facades, is in keeping with the area. There may be scope to unify the overall appearance of the balconies to create a more coherent facade design, although the varying balcony types are well located based on external impacts such as wind. The approach to façade design as secured in the Design Code gives the potential for a unified architectural language across the character areas and is supported" (paragraph 116)

- 8.6 The above conclusions were highlighted to LBN in the Addendum PDM&ERS (June 2019) before the planning application was determined by LBN.

LBN's Suggested Reasons for Refusal

- 8.7 The three reasons for refusal suggested by LBN that relate to 'scale, design and appearance' are set out below:

Reason for Refusal No.1:

1. *The proposed development has failed to adequately address the principles of masterplanning with particular attention to the successful integration of the scheme*

with the wider public area and the transition between, and neighbourliness of different uses both within the site and in relation to adjacent areas. The proposals also fail to provide adequate assurances for the delivery of the masterplan as a whole. This would likely fail to build and reinforce communities and places that work and to ensure that growth contributes to achieving convergence and personal and community resilience. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019); and*
- *Policies S1, S3, S4 and SP3 of the Newham Local Plan (December 2018).*

Reason for Refusal No.6:

6. *The proposed development fails to deliver the added value expected of all tall buildings because its design fails to integrate and positively contribute to its location and fails to make a positive contribution to convergence objectives. The proposed height, scale and massing would appear overbearing, bulky and incongruous and so would negatively impact the character, appearance and townscape of the surrounding area and would create a hostile environment at ground floor level. The proposal is therefore contrary to:*

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7 of The London Plan – The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies, D1, D2, D3 and D8 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies S1, S3, S4, SP1, SP2, SP3 and SP4 of the Newham Local Plan (December 2018).*

Reason for Refusal No.11:

11. *The height, scale and massing of the proposal has resulted in an excessive density which goes far beyond optimising the use of the site. This is contrary to:*

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policy 3.4 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policy D6 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies S1, SP3 and H1 of The London Borough of Newham Local Plan (December 2018).*

8.8 These suggested reasons for refusal specifically relate to the relationship of the scale, design, appearance and density of Proposals' and its integration with the wider public

area the transition between, and neighbourliness of, different uses both within the Site and in relation to adjacent areas.

8.9 These suggested reasons for refusal are regarded by the Applicant to be 'unsound' on the basis that:

- The Proposals have been designed to specifically integrate with the wider area, including the transition between different uses within the Site and on adjacent land (as demonstrated in Sections 3 of the DAS – Volume 2 (December 2018) and Sections 3 to 5 of the DAS – Volume 1 (May 2020));
- The height, scale and massing of the Proposals has not resulted in an excessive density for this location (as demonstrated in Sections 3 to 5 of the DAS – Volume 1 (May 2020), the DAS – Volume 2 (December 2020), the DAS -Volume 2 (May 2020), the Tall Buildings Justification Statement (May 2019), the Independent Tall Buildings Statement (December 2018) and the Townscape & Visual Impact Assessment set out in Appendix 16 of the ES Addendum - Volume 1 (May 2020));
- The Proposals are not overbearing, bulky and incongruous and would be appropriate for the character, appearance and townscape of the surrounding area (as demonstrated in Sections 3 to 5 of the DAS – Volume 1 (May 2020), the DAS – Volume 2 (December 2020), the DAS -Volume 2 (May 2020), the Tall Buildings Justification Statement (May 2019), the Independent Tall Buildings Statement (December 2018) and the Townscape & Visual Impact Assessment set out in Appendix 16 of the ES Addendum - Volume 1 (May 2020)); and
- The Applicants have agreed that the reserved matters applications for Phases 2 to 11 will be the subject of a 'Design Champion' (details to be confirmed) instructed by LBN and the Applicants and a Design Review process to ensure high-quality design is delivered that benefits from LBN's support (as explained in paragraphs 1.9 and 4.58 of this Addendum PDM&ERS (May 2020)).

8.10 Notwithstanding the above conclusion, this Addendum PDM&ERS (May 2020) also explains the subjective design comments raised by LBN's have been fully addressed through the third set of amendments to the Proposals (as described in Section 4 of this Addendum PDM&ERS (May 2020)). This is a significant material consideration since LBN resolved to refuse planning permission.

8.11 As a result of these recent amendments and in the context of the scale of the Site and its riverside location, the Applicant's consider it is appropriate for the Proposals to create a new and improved character for the area. When these attributes are combined with its high accessibility level and the emerging tall buildings context in this riverside location,

the Site benefits from a significant amount of potential to create its own identity in the 'place hierarchy' of LBN and delivering a 'high density character' that will reflect its 'gateway' location status.

- 8.12 The original planning application documents, including the original Design and Access Statement (December 2018), Tall Buildings Justification Report (December 2018), Independent Tall Buildings Statement (December 2018) and a Townscape & Visual Impact Assessment (December 2018) and subsequent Addendum documents and Letters of Conformity (May 2020) demonstrate that the scale, design and appearance of the Proposals can be supported in view of the Site's accessibility, scale and riverside setting and its existing physical separation from the rest of Newham. It will create a new character area that will complement LBN's place hierarchy strategy and knit the Site and this part of the RDBR Opportunity Area back into Newham.

9.0 Affordable, Family & Specialist Housing Statement & Development Management Considerations

9.1 Section 9 of the original Planning Statement (December 2018) and Section 3 of the Density Management Plan (December 2018) consider the acceptability of the Proposals in respect of:

- a) Its affordable housing offer;
- b) Delivery of family homes and specialised homes;
- c) Delivering a high-quality living environment;
- d) Its relationship with neighbouring sites; and
- e) Meeting main development control policy requirements.

9.2 These documents conclude that:

- The Proposal will deliver the maximum reasonable amount of affordable homes, specialist homes and family homes;
- The density of the Proposals is acceptable for this highly accessible Site, is consistent with the density of neighbouring sites and has not been achieved at the expense of the quality of the accommodation or amenity space provision proposed on the Site, nor at the expense of the amenities of the occupiers of neighbouring sites and reflects the emerging character of this part of the Borough and Opportunity Area;
- The Proposals will accord with all development control related policies and guidelines, including the 'agent of change' principles to ensure that the function or capacity of industrial uses within and adjacent to the Site is maintained; and
- The Proposals will make substantial physical and financial contributions to local infrastructure in terms of transport improvements; schools and health infrastructure; and community uses, in accordance with national, regional and local policy and guidelines.

9.3 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as the Section 9 of the original Planning Statement (December 2018) and Section 3 of the Density Management Plan (December 2018):

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included LBN's post-submission amendments); and
- Considered how the Proposals accord with Draft London Plan policy.

9.4 Material changes in circumstances to consider since the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) comprise:

- 1) The conclusions of the GLA's Stage I and Stage II Responses; and
- 2) LBN's suggested fifteen reasons for reasons for refusal.

9.5 These matters are considered in greater detail below.

The GLA's Stage I Response

9.6 The conclusions of the GLA's Stage I Response include:

"The choice of units proposed represents a good range and is supported, subject to further discussion with Council Officers and viability considerations" (paragraph 77)

"Overall, the proposals respond appropriately to the agent of change principles, subject to further discussion and amendment regarding industrial servicing for phase 2" (paragraph 87)

"The Design and Access Statement sets out how development could come forward within the Parameter Plans and Design Codes. This demonstrates the potential for a high quality scheme to come forward" (paragraph 97)

"As discussed in this report, the proposals are considered to be of a good design and residential quality. The proposed density is therefore supported" (paragraph 106)

9.7 The above conclusions were highlighted to LBN in the Addendum PDM&ERS (June 2019) before the planning application was determined by LBN.

LBN's Suggested Reasons for Refusal

9.8 The six reasons for refusal suggested by LBN that relate to 'housing delivery' and 'development control' matters are set out below:

Reason for Refusal No 4:

4. The proposed development introduces residential uses adjacent to a Strategic Industrial Location (SIL) as well as a nightclub and has failed to demonstrate adequate mitigation to protect the future occupants from the impacts of existing lawful operations. This has the potential to fetter the ongoing operation of both the SIL and the nightclub and thus the proposals have not demonstrated compliance with agent of change principles. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies D12, D13 and E5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies S1, S3, S4, J1 and SP8 of the Newham Local Plan (December 2018).*

Reason for Refusal No 7:

7. The proposed development would unacceptably reduce the level of daylight and sunlight to neighbouring residential properties. This would be detrimental to the living conditions of existing residents and would represent an unneighbourly form of development. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 7.1, 7.4, 7.6 and 7.15 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policy D1 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies SP2, SP3 and SP8 of the Newham Local Plan (December 2018).*

Reason for Refusal No 8:

8. The proposed development has failed to demonstrate that it will achieve a BREEAM rating of 'Excellent' as required by Policy SC1. The development's failure to achieve sufficient Building Performance Standards would conflict with the clear objectives of the Development Plan Framework seeking to respond to climate change within developments. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*

- *Policies 5.2 and 5.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policy SI2 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies SC1 and SC2 of the Newham Local Plan (December 2018).*

Reason for Refusal No 9:

9. The proposed development comprises a significant number of studio units and also fail to demonstrate that 19.8% 3 bed homes for families by unit is the maximum amount that can be provided when taking into account viability. The proposed development therefore prejudices the ability to stabilise the community and reduce population churn with implications for convergence and feelings of community cohesion and safety within the borough. The proposed housing mix is harmful to Newham's strategic objective of sustaining mixed and balanced communities and would not sufficiently contribute to redressing the borough's housing stock in terms of prioritising family sized units over small units. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policy 3.8 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies H12 and H15 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies S1, H1 and SP3 of the London Borough of Newham Local Plan: (December 2018).*

Reason for Refusal No 10:

10. The Applicant has failed to demonstrate that 32.5% (based on units), on-site affordable housing represents the maximum reasonable amount of affordable housing that can be delivered on the site on a viable basis. The proposed development would therefore not accord with the Council's overriding objectives to build mixed and balanced communities that work and ensure that growth contributes to achieving convergence. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 3.9, 3.11 and 3.12 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies GG4, H5, and H6 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for public consultation December 2017 with minor suggested changes July 2018);*
- *Policies H1 and H2 of the Newham Local Plan (December 2018).*

Reason for Refusal No 12:

12. The proposed development, by reason of the relationship with surrounding existing land uses, the layout, configuration and orientation of the proposed blocks and the distribution and position of the accessible units and their associated car parking spaces, would fail to provide an adequate standard of accommodation for future occupants. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policy 3.5 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies D4, D5 and D13 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies S1, S3, S4, SP1, SP2, SP3, SP8 and H1 of The London Borough of Newham Local Plan (December 2018).*

9.9 These suggested reasons for reasons for refusal specifically relate to protecting the amenities of the future occupants of the Proposals, the amount of daylight and sunlight received by neighbouring amenities, as well as deliver a BREEAM 'excellent' scheme and securing an appropriate amount of, and living environment for, family homes, affordable homes and accessible homes.

9.10 These suggested reasons for refusal are regarded by the Applicant to be 'unsound' on the basis that:

- The Proposals have been designed specially to protect the amenities of future occupiers of the development (as demonstrated in the Light Within Report Addendum (May 2020), Section 9 of the DAS Volume 2 (December 2018) and Section 2 of the DAS Volume 2 Addendum (May 2020));
- The Proposals have been designed to ensure that an appropriate amount of sunlight and daylight is received by neighbouring development (as demonstrated in Chapter 13 of the ES Volume 1 (December 2018) and the ES Volume 1 Addendum (May 2020));
- LBN could have applied a condition requiring the commercial floorspace to meet BREEAM excellent. Nonetheless, the Proposals have now been adjusted in the third set of amendments to deliver BREEAM excellent floorspace (as demonstrated in the Energy and Sustainability Statement Addendum (May 2020));
- The Proposals will deliver an appropriate living environment for the occupiers of accessible homes (as demonstrated in the revised Access Statement (May 2020));
- The Proposals are supported by an Affordable Housing Statement (December 2018), an Affordable Housing Statement Addendum (May 2020) and a Financial

Viability Assessment (FVA) (December 2018) and its associated Addendums. The FVA concludes that the affordable housing (by habitable room) proposed is considered the maximum reasonable level of affordable housing the Proposals can provide. However, at the time of preparing this PDM&ERS (May 2020) the affordable housing provision is under discussion between the Applicants and the GLA's Viability Team; and

- The Proposals will deliver an appropriate amount of family homes to meet the demand from market sale and affordable housing tenures, whilst balancing the viability of the Proposals. The Applicants note that paragraph 39 of the GLA's Stage II Response explains that the London Plan Annual Monitoring Report 15 identifies that LBN has achieved above average family-sized (3+ bedrooms) housing completions (21%) compared to a London average of 20%; with affordable family-sized units of 36%, which is significantly above the London average of 25%. A greater proportion of family-sized units are proposed by the Applicants (23%) as achieved for LBN, and a greater amount of affordable family-sized units (38%).

10.0 Environmental Impact Considerations

10.1 Section 10 of the original Planning Statement (December 2018) considers the acceptability of the Proposals in respect of its environmental impact on the following topic areas, as outlined in the following chapters of the Environmental Statement (ES) (December 2018);

- Chapter 6: Traffic and Transportation;
- Chapter 7: Noise and Vibration;
- Chapter 8: Air Quality;
- Chapter 9: Water Resources and Flood Risk;
- Chapter 10: Terrestrial Ecology;
- Chapter 11: Waste Management;
- Chapter 12: Ground Conditions;
- Chapter 13: Wind and Microclimate;
- Chapter 14: Daylight, Sunlight and Overshadowing;
- Chapter 15: Population and Human Health;
- Chapter 16: Built Heritage;
- Chapter 17: Townscape and Visual Amenity; and
- Chapter 18: Greenhouse Gas Emissions.

10.2 Section 10 of the original Planning Statement (December 2018) explains that the ES (December 2018) and its ES Non-Technical Summary (NTS) provide further details on the residual environmental impact of the Proposals and concludes that:

- The Proposals will potentially result in adverse visual impact effects during the demolition/construction and operational phases. However, during the construction phase there is the potential for moderate beneficial effects to local job prospects with the creation of a significant number of full time jobs for construction workers. All other construction environmental impacts assessed in this ES are predicted to be insignificant so long as the recommended supplementary mitigation is implemented;
- During the operational phase there is the potential for moderate adverse daylight, sunlight, and overshadowing effects to be experienced at two close distance residential receptors. However, numerous moderate beneficial effects are predicted as a result of both site-wide biodiversity enhancements and various socio-economic improvements such as an increase in job numbers, educational and healthcare facilities, increased housing provision, and more expenditure into the local economy;

- With regard to cumulative effects “in-combination” with other developments, a moderate to major beneficial effect has been predicted on the local community as a result of improvements to infrastructure, expenditure, job prospects; and
- The ES demonstrates that the Proposal will result in substantially more temporary and residual beneficial environmental effects than adverse effects. This weighs heavily in favour of the Proposal in the planning balance.

10.3 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the first (May 2019), second (June 2019) and third (May 2020) set of amendments to the Proposals (as described in Section 4), particularly as the Section 10 of the original Planning Statement (December 2018):

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included post-submission amendments);
- Considered how the Proposals accord with draft ITP London Plan policy; and
- Even though the Applicants ES Addendum²² (May 2020) explains that during the operational phase there is now the potential for impacts on primary school capacity, however this will be mitigated through the provision of off-site financial contributions and on-site primary school provision.

10.4 Material changes in circumstances to consider since the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) comprise:

- 1) The conclusions of the GLA’s Stage I Response; and
- 2) LBN’s suggested fifteen reasons for reasons for refusal.

10.5 These matters are considered in greater detail below.

The GLA’s Stage I Response

10.6 The conclusion of the GLA’s Stage I Response explains that a commensurate level of mitigation and financial commitment will be needed for a development of this scale to be acceptable in transport and social infrastructure terms, including:

²² Chapter 14 of the ES Addendum (May 2020)

- £6,500,000 towards Thames Wharf DLR Station and a Grampian condition on occupation of later phases;
- £2,750,000 towards bus service and Canning Town Station enhancements; and
- The timing of the delivery of the new primary school.

10.7 The above conclusion was highlighted to LBN in the Addendum PDM&ERS (June 2019) before the planning application was determined by LBN. The Applicants also advised LBN of its intentions to pay these contributions and agree how the new primary school can be delivered and secured by way of legal agreement.

LBN's Suggested Reasons for Refusal

10.8 The four reasons for refusal suggested by LBN that relate to 'environmental impact considerations' and are set out below:

Reason for Refusal No 2:

2. The proposed development has failed to demonstrate good growth and infrastructure sufficiency with particular regard to provisions for the new DLR Station and primary education. This would have a detrimental impact on the ability to build strong and inclusive communities, make the best use of land, create a healthy city, deliver the homes that Londoners need, grow a good economy and increase efficiency and resilience and would not ensure that identified infrastructure needs are met. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policy 1.1 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policy SD1 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,*
- *Policies S1, S3, S4 and INF9 of the Newham Local Plan (December 2018).*

Reason for Refusal No 13:

13. The proposed development has not been accompanied by sufficient information to enable evaluation of existing road conditions and to project future impact on the local road network, in particular the impact on junctions. The proposals have therefore failed to demonstrate that they are acceptable in terms of highway safety. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*

- *Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).*

Reason for Refusal No 14:

14. The proposed development relies on the use of existing surrounding transport infrastructure however insufficient information has been provided to demonstrate appropriate accessibility to these transport nodes. This would be detrimental to pedestrian and cyclist safety. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).*

Reason for Refusal No 15:

15. The proposed development would be served by a road which fails to adopt a healthy street approach and thus would be detrimental to the pedestrian and cyclist experience as well as a successful integration of a new mixed-use neighbourhood in this location. This is contrary to:

- *the National Planning Policy Framework (MHCLG, February 2019);*
- *Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);*
- *Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);*
- *Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).*

10.9 These suggested reasons for refusal specifically relate to providing sufficient evidence, or appropriate mitigation, to ensure that the Proposals benefit from sufficient public transport facilities and other social infrastructure to meet the needs of the future occupiers. They are regarded by the Applicant to be 'unsound' on the basis that:

- The Proposals will benefit from a fully funded new DLR station which will be delivered by TfL in 2024 and is partly funded (£6.5M) by the Proposals in

accordance with TfL's request (as explained in paragraph 2.9 and 4.58 of this PDM&ERS (May 2020));

- The Proposals will also contribute £2,750,000 towards Canning Town Station enhancements in accordance with TfL's most recent request (as explained in paragraph 4.58 of this Addendum PDM&ERS (May 2020));
- The Proposals will deliver a 4FE primary school during the construction of Phase 9 and, in the meantime, appropriate financial contributions and temporary primary school provision will be secured by a legal obligation (as explained in paragraphs 4.44 and 4.58 and Appendix 6 of this Addendum PDM&ERS (May 2020));
- The planning application material provides sufficient information to demonstrate appropriate accessibility to all forms of public transport nodes (as demonstrated in the Transport Assessment (December 2018) and the Transport Assessment Addendum (May 2020)); and
- The Proposals have adopted a healthy streets approach and will successfully integrate this new mixed-use neighbourhood into this location (as explained in the Transport Assessment Addendum (June 2019) and the Transport Assessment Addendum (May 2020)). The Applicants also seek the GLA's agreement that a condition is applied to the final decision notice that requires a Healthy Streets Assessment to be submitted with any subsequent reserved matters application(s).

11.0 Regeneration & Planning Balance

11.1 Section 11 of the original Planning Statement (December 2018) and Section 4 of the Density Management Plan (December 2018) considers the acceptability of the Proposals in respect of:

- a) Its regeneration benefits as significant material planning considerations in the determination of the planning application; and
- b) The presumption in favour of sustainable development

11.2 These documents conclude that the Proposals will give rise to a series of significant planning benefits, which weigh positively in favour of the scheme. Having regard to the three dimensions of sustainable development, as defined in the NPPF, the benefits associated with the Proposals are described below:

Economic Benefits

- Delivering a much-enhanced retail offer in a new local centre (7,368 sqm GEA);
- Creating a significant number of 686 to 965 FTE employment opportunities for local residents as part of the operation of the additional retail and other commercial floorspace;
- Creating a significant number of 830 to 876 FTE construction jobs per annum during the build programme, plus apprenticeships and training opportunities and indirect employment and economic benefits experienced as a result of the spin-off and multiplier effects arising from the construction process;
- Provide flexible industrial floorspace for use by local large-scale occupiers (15,000 sqm) and small-to-medium-sized enterprises (4,441 sqm);
- Provide a boost to the local economy, following the delivery of 5,000 new homes, by increasing overall expenditure on convenience and comparison shopping in the local area (approximately £81.0m per annum) and a total of £410m GVA generated per annum by the resident population in employment;
- The generation of further indirect employment (approximately 740 jobs) and economic benefit (Approximately £403m p/a) through the use of local suppliers of construction and process materials, plant and equipment, in addition to services such as local food and drink outlets to meet the needs of construction workers;
- The significant levels of CIL and financial contributions that the LBN and the GLA require (approximately £30m+) plus the extent to which the scheme will generate New Homes Bonus and Council Tax payments (approximately £7.6m per annum+).

Social Benefits

- Help to address local housing needs by provide 5,000 high quality new market sale and affordable homes of mixed tenure (including 100 Specialist Homes) that all meet the Mayor of London's housing standards, have private amenity space and which have access to communal space;
- Provide purpose-built wheelchair accessible and adaptable housing suitable for those with disabilities to support a mixed and balanced community;
- Provide family homes and specialist homes to meet LBN's needs;
- Provide new multi-purpose community facilities which will include a 4FE primary school (840 places) and sports hall, a nursery (104 places), a community facility (1,790 sqm), MUGAs and a BMX track;
- Delivery of new high-quality public realm, a 4-acre park, station square, pocket garden spaces, a riverside walk, enhanced SINC areas and playspace provisions.

Environmental Benefits

- Make effective use of previously developed land;
- Utilise placemaking principles and well-designed architecture and public realm to enhance the character, appearance and townscape setting of this part of the Borough;
- Improve permeability, access and movement across the Site to the River Thames and beyond;
- Utilise good quality and sympathetic design to enhance the character of the area and setting of nearby heritage assets;
- Address security concerns by utilising Secured by Design principles, including active frontages and well-lit spaces to deter crime and antisocial behaviour;
- Encourage sustainable transport choices and to minimise reliance on travel by the private car;
- Construct energy-efficient and sustainable buildings (including efficient building fabric and renewable energy technologies) that would minimise carbon dioxide emissions and the potential contribution to climate change resulting from the Proposal;
- Deliver habitat creation and enhancements to biodiversity that will help encourage protected species to inhabit the Site;
- Provide qualitative and quantitative improvements to the public realm, landscaping, and effective tree management, that would help to maintain the established natural setting of the Site over a longer period; and
- Improve the flood defences of the Site and its surface water drainage conditions.

11.3 Section 11 of the original Planning Statement (December 2018) also concludes that:

- The Proposals are an excellent example of sustainable development, as recognised by the NPPF. The approval of the Proposal would also deliver a significant beneficial asset to LBN that would make an important and positive contribution to the Borough's identified employment and housing needs as well as deliver an improved sense of place and the quality of the built environment;
- The Proposals will deliver numerous significant planning benefits that will positively contribute towards the regeneration of the Site, this part of the LBN and this important Opportunity Area;
- The nature and quantum of development proposed reflects the Government's, Mayor of London's and the LBN's ambition to take advantage of enhancements to public transport being delivered by DLR improvements and Crossrail by utilising place-making principles in order to assist in regenerating this part of the Arc of Opportunity into a new vibrant neighbourhood that will deliver a significant number of new homes and jobs; and
- The Proposal represents a sustainable form of development for which there is a "presumption in favour" as set out in national, regional and local planning policies.

11.4 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the first, second and third set of amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as the original Planning Statement and Density Management Plan:

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included post-submission amendments); and
- Considered how the Proposals accord with Draft London Plan policy.

11.5 A material changes in circumstances to consider since the original Planning Statement (December 2018) and Employment Re-Provision Statement (December 2018) is the conclusions of the GLA's Stage II Response, including:

"The application proposes a range of uses around the station to serve the new and existing community, including retail, community and leisure uses, business space, a new primary school, and public realm, to form a new local centre. As

such, the application is considered to have a significant impact on the London Plan with regard to town centre policy" (paragraph 33)

"The application proposes a four form-entry primary school (5,255 sq.m.) within the new town centre to address the needs arising from the proposal, as well as addressing the wider deficit of primary school places across Newham and Key Performance Indicator 12 in the London Plan Annual Monitoring Report (reduce the average class sizes in primary schools). A community facility (1,800 sq.m.) is also proposed within the new town centre. There is no specific occupier identified for the community facility; however, it could be used for a variety of Use Class D1 and D2 uses, including a clinic, health centre, GP surgery, dentist, creche, library, hall, gymnasium... The proposals would therefore have a significant impact on the implementation of the London Plan in relation to social infrastructure" (paragraphs 35 and 36)

"The application proposes Dock Park, (2.3 hectares), Leaway Park (0.6 hectares), and the Eastern Ecology Park (1.2 hectares), as well as a riverside walkway. Newham's Local Plan identifies that the site is within an area of open space deficiency in terms of small spaces, local parks, district parks, and metropolitan/regional parks. The significant open space provision within the scheme would contribute to meeting this deficiency, and would serve residents of the proposed development. The proposals would therefore have a significant impact on the implementation of the London Plan in terms of open space" (paragraph 37)

"The proposals would provide 5,000 new homes and up to 965 new jobs, which would clearly have a significant impact on the implementation of the London Plan in relation to London Plan Policy 2.13 'Opportunity Areas', and the associated housing and employment targets" (paragraph 27)

"Noting that Newham Council's recent delivery of housing and affordable housing is under the London Plan target, and more generally that there is a London-wide shortfall against the strategic housing and affordable housing targets, the proposed development has the potential to make an important and significant contribution to housing and affordable housing supply in response to London Plan Policies 3.3 and 3.11, and housing and employment targets in response to London Plan Policy 2.13. This is an underutilised, brownfield site located within an Opportunity Area, which as a result of this proposal (and facilitating delivery of

the new DLR station), will become significantly more accessible, and is therefore of strategic importance for housing delivery” (paragraph 40)

“Furthermore, the delivery of a new local town centre, public open space, and social infrastructure floorspace, would have a significant impact on the implementation of London Plan Policies 2.13, 2.15, 3.1, 3.16, 3.18, 4.7, 4.8, 6.1, 6.2, 6.4, 6.7 and 7.18” (paragraph 41)

- 11.6 Not only will the Proposals give rise to a series of significant planning benefits, which would weigh positively in favour of the Proposals, it will also deliver significant favourable impacts on the implementation of the objectives of the London Plan.

12.0 Conclusion

12.1 Section 12 of the original Planning Statement (December 2018), Section 6 of the Employment Re-Provision Statement (December 2018) and Section 7 of the Density Management Plan (December 2018) summarise the Proposals and provide an overview in support of favourably determining the hybrid planning application. They conclude:

- The demolition of the existing buildings on the Site is acceptable;
- The impact of this loss of employment from the existing buildings on the Site is acceptable, particularly as this will already be brought about by the Silvertown Tunnel DCO proposals and the Applicants' Operational Works Application. Nonetheless, the existing employment lost from the Silver Building and ASD will be replaced in the long-term by significantly more Class B floorspace to satisfy the long-term objectives of the adopted and emerging policy;
- The Applicants have worked closely with LBN and the GLA to prepare a masterplan that aligns as close as possible with adopted and emerging policy aspirations, particularly the adopted allocations (S08 and S09) for the Site;
- There are no site allocation related impacts resulting from the Proposals which have not been addressed. In fact, the Proposals for a high-density mixed-use development, including co-location proposals, is 'in line' with LBN's and the MOL's policy objectives for this Site and the wider Opportunity Area;
- The principle of the land uses proposed, including co-location, is supported by adopted and draft policy on the basis that it will deliver a new vibrant and exciting mixed-use neighbourhood for LBN in this Opportunity Area that will deliver a wide variety of uses, including:
 - Residential uses (market sale homes, affordable homes and older persons accommodation);
 - Employment uses (flexible retail units, flexible workspace, industrial floorspace and other commercial as part of a new local centre);
 - Leisure and tourism uses (retail floorspace, four-acre park, riverside walkway, SINC designation improvements, BMX track and other public realm, etc); and
 - Community uses (four-acre park, 4FE primary school, nursery school, community centre facilities, multi-use games areas that are available for use by the general public).
- The Site is physically and characteristically separated from the rest of LBN. The scale of the Site in combination with its high level of accessibility and riverside location means that it is capable of both creating and supporting a new and improved character for the area. When these attributes are combined with the

emerging tall buildings context in this riverside location, the Site benefits from a significant amount of potential to create its own identity in the 'place hierarchy' of LBN and delivering a 'high density character' that will reflect its 'gateway' location status;

- LBN's Officers, LBN's DRP and the GLA's Officers agree that the Site is an appropriate location for high-quality mixed-use development that should contain tall buildings. They also agree that the general layout, character areas and building typologies are appropriate and that the finer details for the outline part of the Site can be secured by reserved matters applications following a set of clear Parameter Plans and Design Codes;
- From LBN's perspective, the matter that requires further justification is the amount and height of the tall buildings proposed beyond LBN's suggested indicative height guidance (of 10 to 12 storeys with instances of 18 storeys). The original Planning Statement (December 2018), supported by a Tall Buildings Justification Report (December 2018), an Independent Tall Buildings Statement (December 2018) and a Townscape & Visual Impact Assessment (Chapter 17 and Volume 2 of the ES)(December 2018) demonstrate that the scale, design and appearance of Proposals can be supported in view of:
 - The Site's scale and riverside setting and its existing physical separation from the rest of Newham. It can create a new character area that will complement LBN's place hierarchy strategy and knit the Site back into LBN;
 - The Site's highly accessible location in the Arc of Opportunity and the Royal Docks and Beckton Riverside Opportunity Area where the delivery of homes and jobs are to be the main focus;
 - The Site's nature and the Proposals will not harm the character of surrounding areas, the amenities of neighbouring occupiers nor the settings of heritage assets and significant viewpoints;
 - The Site's 'gateway' location surrounded by tall buildings of between 16 to 60 storeys. As such, slender buildings that are taller than LBN's indicative building heights will complement (rather than compete) with Canning Town's, Stratford's, Beckton's and East Ham's strategic positions as retail centres / transport hubs and will not compromise the objectives of LBN's place hierarchy and tall buildings strategy. The Site can create its own identity in the 'place hierarchy' of LBN and delivering a 'high density character' that will reflect its highly accessible gateway location;
 - The significantly greater number of benefits that can be delivered on the Site because of delivering the Site's full development potential; and

- The principles of tall buildings placement on the Site are appropriate and merits of the masterplan scheme (in density and scale terms) is in-keeping with the future development context for the Site and the wider Opportunity Area.
- The Site should be given this opportunity to optimise its full potential rather than unnecessarily suppressing the amount of development and, therefore, substantially reducing the amount of benefits that can be delivered for the Site. Delivering its full potential will:
 - Enhance the skyline and, in particular, the larger scale massing at the key nodal points in the townscape will assist in wayfinding and contribute positively to the legibility of the townscape;
 - Deliver a greater variation in the height of the introduced built form, while providing sufficient scope to create two distinct clusters of high-rise development that reflects the modulation in the skyline that is prevalent in the surrounding townscape. This aspect is crucial in creating a character and cityscape that is of visual interest, as opposed to creating a more monotonous skyline that will fail to deliver tangible wayfinding and legibility benefits;
 - Enable the layout and arrangements of the introduced built form to allow physical and visual permeability through the Site towards the River Thames, while new vistas and views will be created towards landmarks and substantial areas of publicly accessible open green space, enhancing the townscape; and
 - Result in a high-rise development on the Site of a scale that is crucial in creating a sympathetic transition between the much larger scale emerging context in London Borough of Tower Hamlets and Royal Borough of Greenwich, and the aspirations for LBN at Canning Town and Stratford. Without the two distinct high-rise clusters proposed within the Site (which will reflect the modulated pattern of the emerging cityscape), a void in the future skyline will be created that will neither reinforce legibility nor contribute positively to its composition. As a consequence, this would result in poor place-making that fails to capitalise on the scale of opportunity presented to revitalise the gateway to LBN at this particular location.
- The Site and Proposals will achieve this crucial tenet of townscape and urban design, rather than providing a more homogenous solution that does not set itself apart from any other modern development across London;

- The Proposals will deliver the maximum reasonable amount of affordable homes, specialist homes and family homes. The density of the Proposals is acceptable and has not been achieved at the expense of the quality of the accommodation or amenity space provision proposed on the Site, nor at the expense of the amenities of the occupiers of neighbouring site and reflects the emerging character of this part of the Borough and Opportunity Area;
- The Proposals will accord with all development control related policies and guidelines, including the 'agent of change' principles to ensure that the function or capacity of industrial uses within and adjacent to the Site is maintained;
- The ES (December 2018), the ES Non-Technical Summary (NTS) and their associated Addendum documents provide further detail on the residual environmental impact of the Proposals. They conclude that there are no residual environmental impacts resulting from the Proposals that cannot be mitigated, and the Proposals will result in a moderate to significant beneficial environmental impact. Overall, the Proposals will therefore make substantial physical and financial contributions to local infrastructure in terms of social infrastructure in accordance with national, regional and local policy and guidelines;
- With London's population expected to increase by 70,000 every year, reaching 10.8 million in 2041, it is vital that Proposals like these are supported to tackle the housing crisis and to make the most of precious land in the Capital in areas with the best transport links. The Site is the ideal location for the scale and amount of development Proposed by the Applicant's masterplan. This is an exciting opportunity for the delivery of a high-quality riverside development located in a sustainable and highly accessible location, whilst working around the constraints of this Site and reflecting the scale of nearby development. It will also secure an opportunity for LBN and the GLA to deliver a comprehensive proposal which includes London's first true co-location scheme, one which can be delivered;
- The Proposals will deliver numerous significant planning benefits that will positively contribute towards the regeneration of the Site, this part of the Newham and this important Opportunity Area;
- As explained in Section 11 of the original Planning Statement (December 2018), the nature and quantum of development proposed reflects the Government's, MOL's and the LBN's ambition to take advantage of enhancements to public transport being delivered by DLR improvements and Crossrail by utilising place-making principles in order to assist in regenerating this part of the Arc of Opportunity into a new vibrant neighbourhood that will deliver a significant number of new homes and jobs; and

- The Proposals represents a sustainable form of development for which there is a “presumption in favour” as set out in national, regional and local planning policies.

12.2 This Addendum PDM&ERS (May 2020) confirms that the above conclusions do not change as a result of the first (May 2019), second (June 2019) and third (May 2020) amendments to the Proposals (as described in Section 4) and the adoption of the Newham Local Plan, particularly as the original Planning Statement, Employment Re-Provision Statement and Density Management Plan:

- Gave significant weight to the policies contained within the draft version Newham Local Plan (which included LBN’s post-submission amendments);
- Demonstrated how the Proposal would comply with adopted and emerging policies contained within the draft version Newham Local Plan (which included LBN’s post-submission amendments); and
- Considered how the Proposals accord with draft ITP London Plan policy.

12.3 This Addendum PDM&ERS (May 2020) has also highlighted that LBN’s suggested fifteen reasons for refusal are unsound and, if supported by the MOL, would result in the GLA missing out on an important opportunity to deliver significant favourable impacts on the implementation of the objectives of the London Plan. The Proposals should be determined by the MOL into context of:

- The substantial planning benefits of the Proposals (as described Section 11 above);
- The delivery of the maximum reasonable amount of affordable homes and the scheme’s viability; and
- The significant favourably impacts of the Proposals on the implementation of the objectives of the London Plan.

12.4 These matters strongly support and significantly outweigh LBN’s unsound reasons for refusal when the ‘planning balance’ is applied in the determination of the planning application for this sustainable high-quality and exciting new development.

Appendix 1


List of post-submission Consultation Meetings

- Meeting with residents of Western Beach Apartment, 16th January 2019
- Meeting with LBN Case Officer and Temple (EIA assessors), 18th March 2019
- Post Submission DRP, 9th April 2019
- Meeting with LBN Case Officer and Manager, 14th May 2019
- Meeting with LBN Case Officer, Transport Officer and TfL, 20th May 2019
- Meeting with LBN Case Officer and Manager, 7th June 2019

Appendix 2

THAMESIDE WEST PLANNING APPLICATION (18/03557/OUT) – CONSULTATION RESPONSE TRACKER

17/05/2019

Consultee	Date	Comment	Response/Action
LBN airport Monitoring Officer	22/01/2019	<p>No objection and two informative sought, in relation to:</p> <ol style="list-style-type: none"> 1.Noise insulation 2. Thermal Modelling 	Response to case officer 14/05/2019.
Canal & River Trust	23/01/2019 & 04/02/2019	<p>No requirement to consult as falls outside the notified area for its application scale.</p>	N/A
Crossrail Limited	24/01/2019	<p>No objection but informative provided in relation to TfL land ownership as follows:</p> <p>INFORMATIVE: The Local Planning Authority and the Applicant be advised that the proposed development site boundary extent, as described in the application supporting documentation, encroaches onto land that is the freehold property of Transport for London (TfL). The Applicant is therefore, advised to consult TfL Operational Property prior to any use of or access/egress over the TfL property. The TfL land boundary extent is illustrated below.</p> 	Informative noted and applicant to consult TfL prior to any use or access over TfL land.

Consultee	Date	Comment	Response/Action
Sports England	5/02/2019	<p>No objection. Comments provided relating to:</p> <ul style="list-style-type: none"> • The Council should consider the sporting needs arising from the development as well as the needs identified in its Infrastructure Delivery Plan (or similar) and direct CIL contribution monies to deliver new and improved facilities for sport. • Sport England notes that the development proposes a community/leisure facility (Use Class D1/D2). Sport England recommends that any sports facility provided meets the needs identified in the Council's robust sporting strategies. • Sport England would commend the use of the 'Active Design' guidance in the master planning process and would be happy to engage further. 	Noted – comments in relation to active design to be considered in the reserved matters.
NATS	05/02/2019	No safeguarding objection.	Noted – no action required.
EA	05/02/19	No objection and conditions sought.	Conditions accepted.
Royal Borough of Greenwich	06/02/19	No objection and conditions sought.	Conditions accepted.
GLAAS	08/02/2019	No objection but three conditions sought to secure archaeological evaluation, control over the extent and location of remediation groundworks and foundation design and a scheme of public heritage interpretation be applied to any forthcoming consent.	Response to case officer 13/05/2019 seeking amends to conditions.
Thames Water	12/02/2019	No objection but various comments and conditions requested.	Conditions accepted.
LBN Waste	13/03/2019	No additional comments provided.	N/A
Lead Local Flood Authority (LLFA)	19/02/2019	Objection to drainage strategy and conditions sought to overcome.	Updated drainage information submitted to LBN and the GLA 09/05/2019 and are included in the Phase 1 Drainage Strategy (June 2019).

Consultee	Date	Comment	Response/Action
Highways England	20/02/2019	No objection and conditions sought.	Conditions acceptable.
Met Police	21/02/2019	<p>Comments provided in relation to phase 1. General strategy for the outline elements signed off. Want to be kept up to date with project progress.</p> <p>The following condition and informative requested:</p> <p>Condition:</p> <p><i>'Prior to occupation, of each phase the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police. The development shall be carried out in accordance with the approved details and thereafter shall be fully retained and maintained as such for the lifetime of the development.'</i></p> <p>Informative:</p> <p><i>The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) at each phase and notify this office of any changes to the planning application or approved scheme relevant to security or design layout. The services of MPS DOCOs are available free of charge and can be contacted via Docomailbox.NE@met.police.uk or during office hours via Telephone: 0208 217 3813.</i></p>	<p>Please see response in DAS Vol 2 addendum (June 2019).</p> <p>Condition and informative acceptable.</p>
GLA Stage 1 Water Comments	22/02/2019	Various comments provided and conditions sought.	Response issued to the GLA (copied to LBN) 09/05/19.
GLA Stage 1 Energy Comments	25/02/2019	Various comments provided and conditions sought.	Response issued to the GLA (copied to LBN) 25/04/19.

Consultee	Date	Comment	Response/Action
	<p>08/05/2019</p> <p>11/06/2019</p>	<p>Further comments issued.</p>	<p>Response prepared and included in the Energy and Sustainability Addendum (June 2019)</p>
<p>LBN Design Panel</p>	<p>9/04/2019</p>	<p>Various comments provided. Summary:</p> <p><i>This workshop follows four full panel reviews of the Thameside West project at pre-application stage. The design review process has resulted in some positive changes to the design of the proposals in response to the comments made, particularly in relation to the masterplan in two dimensions. However, we remain uncomfortable with the proposed scale and density of the development – particularly within the ‘Parkside and Landings’ part of the site. The internal street frontage within this part of the site is like a cliff edge and once again we raised concerns about the residential quality, particularly at lower level.</i></p> <p><i>The tall double sided building adjacent to the river on the western side of the park has never been convincingly resolved in terms of its servicing and the reconciliation of its front and back.</i></p> <p><i>The landscape between this building and the cable car pylon also feels very constrained. A larger public space incorporating the harbour and the park without this building in between would, we think, have a better chance of success and would result in more legible and defined western park frontage.</i></p> <p><i>The architecture of the first phase has become less convincing during the evolution of the design and the level of detail submitted in the application does not provide the necessary assurances about quality in terms of its materiality and detailing. The architecture is below the quality previously promised and, for the avoidance of doubt, the elevations would need to be significantly improved rather than tweaked to gain the panel’s support. As with the later phases within the ‘Parkside’ and ‘Landings’ zone we remain uneasy about the proposed scale and density of the proposals.</i></p> <p><i>As it stands the DRP retain some strong reservations about the scheme and are unable, at this stage, to offer its full support for the proposals.</i></p>	<p>Please see response in DAS Vol 2 Addendum in relation to Phase 1.</p> <p>The elevation treatment of Phase 1 has been amended to accord with the DRP’s comments</p> <p>The massing of the buildings in Phase 2 and 3 have been reduced. Nonetheless, our position remains as set out in the updated DAS Vol 1 (June 2019) and Tall Building Justification Report (June 2019).</p>

Consultee	Date	Comment	Response/Action
PLA	12/04/2019	<p>Various commentary:</p> <ul style="list-style-type: none"> • PLA confirm that the planning application needs to consider a number of scenarios: <ol style="list-style-type: none"> 1. Scenario 1 – De-designation of Thames and reactivation of Peruvian and Royal Primrose Wharves 2. Scenario 2 – Thames Wharf remains a safeguarded wharf (further assessments can be conditioned). • Plus confirms need for a grampian style condition or section 106 agreement restricting development on the safeguarded Thames Wharf until the wharf has been de-designated. • The PLA also seek an update to the SWR to assess the implication of the final position of wall 3. As well as conditions to secure the land swop and reactivation strategy. • Commentary on the red line boundary along the riverfront. Needs updating in ES. • Update to the TA/Travel plan to reference the use of the river for transport of passengers. • Reference to river works licence. 	<p>Comments addressed in updated Safeguarded Wharf Report and ES Addendum (June 2019).</p>
LCY	15/04/2019	<p>No objection and conditions sought.</p>	<p>Conditions accepted.</p>
London Borough of Newham	25/04/2019	<p>No observations to make on this application.</p>	<p>Noted – no action required.</p>
GLA	29/04/2019	<p>GLA stage 1 letter and report confirms that the proposal does not currently comply with the London Plan for the reasons set out below but provides various remedies throughout the report to resolve issues.</p> <p>Key issues:</p> <ul style="list-style-type: none"> • Principle of development: supported in principle, subject to amendment of the industrial Use Classes proposed, and further discussions regarding the timing of delivery of the new DLR station, the school, and replacement SIL-type and light industrial space. In addition, conditions are required to prevent the commencement of building on Thames Wharf until safeguarding is amended/removed. 	<p>Please see Appendix 4 of Addendum Planning Statement (June 2019).</p> <p>Climate change responses in relation to energy and water already submitted (see above).</p>

Consultee	Date	Comment	Response/Action
		<ul style="list-style-type: none"> Affordable housing: The FVA is being assessed. Review mechanism must be secured. Urban Design: The proposals respond appropriately to 'agent of change' principles, subject to further discussion and amendment regarding potential conflict between residential and industrial uses in phases 2 and 3. Minimum separation distances between habitable rooms in the Design Code require amendment. Transport: A commensurate level of mitigation and financial commitment will be needed for a development of this scale to be acceptable in transport terms, including £6.5M towards Thames Wharf DLR Station and a Grampian condition on occupation of later phases; £2.5M towards bus service enhancements; and £250,000 towards Canning Town Station enhancements. Climate change: Further information is required on energy, surface water drainage, and water consumption. 	
LBN Planning	3/05/2019 20/06/2019	Request under Regulation 25 (1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) to provide further information in respect of an Environmental Statement	Please see ES Addendum (June 2019)
LBN Housing	13/05/2019	Comments: <ul style="list-style-type: none"> LBN Housing team welcomes the provision of a significant number of Affordable homes as part of this major application. We note the intended provision of 1625 affordable homes within the overall scheme, which comprises 32.5% by unit or 37% by habitable room. We would aspire to 50% affordable housing provision on this scheme, and would query the approach taken here, given the GLA's stated aim of 50% affordable housing on public sector land (draft new London Plan). It is recognised that the site is not wholly owned by GLAP. Otherwise, we welcome the provision of 227 units of affordable housing within the first phase, as well as a distribution of affordable homes across all phases of the scheme as detailed elsewhere in the application. We note the provision of 39% 3-4 bed rented homes across all phases, but note that this is just 15% in phase 1. 	Discussions in relation to housing and affordable housing ongoing. Also see Affordable Housing Statement - Revised (June 2019)

Consultee	Date	Comment	Response/Action
		<ul style="list-style-type: none"> We are supportive of rent setting at LAR benchmark rates or below and welcome the approach of the developer to minimise service charges through low maintenance design, equipment and communal space. 	
TfL	13/05/2019	<p>TfL letter does not raise an objection albeit does raise a number of issues requiring mitigation to be agreed including:</p> <ul style="list-style-type: none"> Commitment towards funding Thames Wharf DLR station improvements - £6,500,000 and Grampian condition beyond 1,500 units Bus service enhancements - £2,500,000 with triggers to be discussed Canning Town internal interchange enhancements - £250,000 Approach to agreeing scope of works and process for improvements to Dock Road, North Woolwich Road and Silvertown Way including developer funding – to be discussed with Newham Council as highway authority Identification of new and improved links for pedestrians within and outside the site (to be discussed with Newham Council and Royal Docks Team), wayfinding (for Legible London) and their delivery including developer funding – to be discussed with Newham Council Requirement for temporary or permanent arrangements for bus stops on Dock Road, or enhancement to stops at Charrington Steps – up to £15,000 per stop Commitment to provision of landing point for footbridge across River Lea to Trinity Buoy Wharf A clear cycling network including details of the specific cycling provision it offers within the development and of its connections beyond the development to poles of attraction within catching area Clarification of car club provision within the overall parking allocations, this should include three year's membership for residents Restricting on-street parking for residents and other Resident Parking Zone – to be discussed with Newham Council Travel Plans <p>Conditions sought for:</p>	<p>Please see ES Addendum, in particular the Transport Assessment (June 2019).</p> <p>Discussions ongoing with TfL.</p>

Consultee	Date	Comment	Response/Action
		<ul style="list-style-type: none"> • A Grampian condition to require Thames Wharf DLR Station to be operational prior to the occupation of Phases 4 onwards, and/or more than 1,500 units • A clear programme for phasing and occupation • A programme for highway works • Car Parking Design Management Plan, disabled persons parking and EVCP provision • Infrastructure Protection – Underground, DLR, Emirates Air Line, River use • Delivery Servicing Management Plan • Construction Logistics Plan including investigation of water borne transport, and associated documents • Design codes including pedestrian and cycle links during construction and completed phases • Public Realm and Open Space Management Plans 	

Appendix 3

THAMESIDE WEST PLANNING APPLICATION (18/03557/OUT) – RESPONSE TO GLA STAGE 1 REPORT

17/05/2019

PARA REFS	ISSUE	APPLICANT RESPONSE
33	There is a need to secure a 'safeguarded wharf reactivation strategy' prior to the redevelopment of the safeguarded wharf site.	The applicant is willing to accept a condition or legal obligation to secure this.
36	In relation to the Silvertown Tunnel project, TfL require asset protection and development collaboration agreements to be in place prior to the commencement of each development phase, due to the complexity of the interface and timing requirements for both developments.	The applicant is willing to enter into further agreements with TfL and is happy to accept a condition or legal obligation to secure these. The applicant is happy to discuss this further.
41 & 141	Safeguarding of the proposed landing points for bridge links across Bow Creek to Trinity Buoy Wharf should be appropriately secured.	Sufficient landing space is shown in the indicative masterplan and parameter plans. This will be considered in future reserved matters applications.
47	Further details should be provided on current tenancy arrangements in the Silver Building, and both the timing of the Flyunder application and the delivery of the new space.	<p>The tenants in the Silver Building are aware that the space is in a temporary meanwhile use and is therefore not a permanent solution. In addition, planning permission has already been secured to demolish the building (ref: 17/02554/FUL).</p> <p>The Flyunder planning application is currently with Newham for determination (ref: 18/03657/OUT). At present it is scheduled to be determined at planning committee in June 2019.</p> <p>There will be opportunities for tenants from the Silver Building to lease space in the Flyunder proposal if they wish, however there is no requirement to do so.</p> <p>There is no link or reliance between this planning application and the Flyunder planning application.</p>
49	In order to ensure this part of the site (i.e. the industrial phase) functions effectively as replacement industrial capacity for that lost within the SIL, Use Class B1(b) should be removed from this part of the proposal.	Class B1b use has been removed from the industrial phase (Block V on the Phasing Plan - 15,000 sqm). Please see revised description of development.

50	GLA officers consider that Use Class B2 space should be removed from phases 1 and 2 due to potential compatibility issues with residential.	In order to ensure flexibility for potential occupiers and ultimately to secure a tenant, the applicant would like the B2 use to remain. As set out in the JLL Statement (Appendix 1 of the Planning Statement) there is a range of B2 users which could comfortably operate from the Site without causing a nuisance to the neighbouring residential use. The applicant is willing to accept a restricted B2 use on phases 1 and 2, and is happy to work with both the GLA and LBN to agree the precise wording of the necessary condition or planning obligation to secure this. The applicant is happy to discuss this further.
54 & 58	Guarantees on the timing of the delivery of the industrial phase (15,000 sqm)	The industrial phase will now be delivered earlier in the project – at phase 3. Please see updated phasing plan. The applicant is also happy to accept a legal obligation to secure this.
64	The school is currently in the penultimate phase, which raises concerns about provision of school places ahead of this. It is recognised that the phasing plan will be amended when further details are known about the timing of land availability as the Silvertown Tunnel is constructed; however, delivery of the school will need to be secured before an identified number of units are occupied. Further discussion is required on this matter, including options for temporary provision.	The applicant is willing to discuss the delivery of the school further and the potential requirement for temporary provision until it is built. This can be secured through a legal obligation with an appropriate trigger. It is important to note that the permanent school delivery is impacted by the delivery of the Silvertown Tunnel.
65	Discussion should take place with Newham Clinical Commissioning Group (CCG) to establish whether a new healthcare facility is required or whether financial contributions to develop existing healthcare provision is necessary.	A consultation response from Newham CCG is still awaited. However, the development could accommodate a healthcare facility if required due to the flexibility of the D class uses proposed.
72-74	Affordable housing provision, tenure and review mechanisms to be agreed following viability review.	Discussions are ongoing and the applicant is happy to continue to engage.
83	Design solution for lower 6 units in block A.	Please see response in DAS Vol 2 Addendum (June 2019).
85 & 140	The arrangements for phase 2 in the outline application indicate that industrial servicing will be via the route that also services residential uses and entrances, which raises concerns about potential conflict. The applicants should investigate options for servicing via Bell Lane in order to avoid this. Residential units in phases 2 and 3 will also be in close proximity to retained SIL uses and similar mitigation to that proposed for phase 1 will be required. This should be reflected in the Design Code, which requires amendment in this respect.	<p>The applicant does not consider there will be a conflict at phase 2 and feels that any potential issues can be resolved at reserved matters stage. Please see further details in DAS Vol 1 (June 2019). Bell Lane is not within the applicant's control and is therefore not a viable alternative option at this stage.</p> <p>The appropriate mitigation for phase 2 and 3 will be driven by the technical chapters of the ES and secured via condition and/or resolved in the detailed design submitted at reserved matters stage.</p> <p>The applicant is happy to discuss this further.</p>

94	The boundaries of development zones R and N appear overly close to the river boundary compared to neighbouring zones, potentially limiting successfully operation and quality of the route. The application should provide further justification and amendment may be required.	There is a minimum of 5m of Riverwalk (with a further 5m of intertidal terrace) throughout the Site and therefore there will be no conflict of route or its operation by residents, cyclist or ad hoc maintenance and service vehicles. The applicant is happy to discuss this further.
104	Minimum building distances are set at 12 metres in the Design Code, which raises some concerns as this, together with the proposed mitigation measures, will be likely to reduce natural light levels into units and in-between buildings. The applicants should increase the minimum distance in the Design Code and/or provide further justification/analysis.	In order to make the best use of this sustainable brownfield site, minimum separation distances of 12 metres are proposed in some specific locations. The scheme however largely provides 16 to 18 metres separation distances. Please see page 24 in the updated DAS Vol 3 Design Code (June 2019) for further details. Appropriate privacy mitigation will be considered and devised at reserved matters stage.
116	In relation to phase 1, there may be scope to unify the overall appearance of the balconies to create a more coherent facade design, although the varying balcony types are well located based on external impacts such as wind. The approach to facade design as secured in the Design Code gives the potential for a unified architectural language across the character areas and is supported.	Please see response in DAS Vol 2 Addendum (June 2019).
122	Further assessment of the strategic public transport impacts of the scheme.	Please see updated Transport Assessment (June 2019).
123	Further local highway modelling work required.	Please see updated Transport Assessment (June 2019).
125	£6.5m contribution to new DLR station.	The applicant is willing to consider a contribution to the station in principle; however, the exact figure is to be agreed and is subject to other wider viability considerations.
126	Phase 4 onwards will be dependent on the delivery of Thames Wharf Station, and a Grampian condition is therefore recommended to require Thames Wharf DLR Station to be operational prior to the occupation of Phases 4 onwards, and/or more than 1,500 units.	The delivery of the Thames Wharf Station does not in itself impact on the DLR capacity. The applicant does not feel a Grampian style condition is appropriate, especially when considered against the restricted delivery of residential units as a result of the Silvertown Tunnel DCO. -The applicant is happy to discuss this further.
127	Further details on occupation timescales are required by TfL, and suitable conditions will need to be in place to ensure that there is no undue impact from the development on train capacity prior to these improvements being in place.	Please see updated phasing plan and phasing table in the Addendum to the Planning Statement (June 2019).
128	£250,000 contribution to Canning Town Station improvements	The applicant is willing to consider a contribution to the station improvements in principle; however, the exact figure is to be agreed and is subject to other wider viability considerations.

130	£2.5m contribution to TfL buses and bus stop improvements.	The applicant is willing to consider a contribution to TfL buses in principle; however, the exact figure is to be reviewed and is subject to other wider viability considerations.
121 & 132	Highway and public realm improvements funding and delivery.	The applicant is willing to accept an appropriate mechanism for securing funding and delivery of on-site highway and public realm improvements in principle. The applicant is happy to discuss this further.
135	Car club delivery	The applicant is happy to accept a legal obligation to secure the delivery of the car club bays.
136	A Parking Design and Management Plan should be secured as a condition.	The applicant is willing to accept this.
137	Cycle parking to be secured via condition	The applicant is willing to accept this. This can be dealt with at reserved matters stage.
138	Travel plan to be secured via condition	The applicant is willing to accept this.
144	A CLP should be secured by condition.	The applicant is willing to accept this.
145	A DSP should be secured by condition.	The applicant is willing to accept this.
147	Further information on the energy strategy requested.	Additional details already provided to the GLA. Please see Energy and Sustainability Statement Addendum (June 2019) for further details.
148 to 151	Further details on drainage and water requested.	Additional details already provided to the GLA. Please see Updated Drainage Strategy (June 2019) for further details.

Appendix 4



APPLICATION FOR OUTLINE PLANNING PERMISSION

**Town and Country Planning Act 1990 (as amended)
Town and Country Planning (Development Management Procedure) (England) Order 2015**

APPLICANT:

Silvertown Homes Ltd and GLA Land & Property
Ltd (GLAP)
C/o Agent

AGENT:

Mr Justin Kenworthy Barton Willmore
7 Soho Square
London
W1D 3QB

Part I - Particulars of Application

APPLICATION NO: 18/03557/OUT **DATE OF APPLICATION:** 9th January 2019

PROPOSAL:

Hybrid planning application comprising:

1. Detailed planning application for Phase 1 with works to include: Proposed demolition of existing buildings and structures, erection of buildings, including tall buildings, comprising: 460 residential Units (Use Class C3), 3,417sqm (GEA) of flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted), B8); 162 sqm (GEA) of flexible retail floorspace (Use Classes A1-A4); a new/altered access road from Dock Road/North Woolwich Road; new streets, open spaces, landscaping and public realm; car, motorcycle and bicycle parking spaces and servicing spaces; and other works incidental to the proposed development.

2. Outline planning application (all matters reserved) for phased delivery of the balance of the site for the proposed demolition of existing buildings and structures; erection of buildings, including tall buildings, comprising: a new local centre; a primary school (Use Class D1); residential and older person units (Use Class C3); flexible employment floorspace (Use Classes B1b, B1c, B2 (restricted), B8); flexible employment floorspace (Use Classes B1c, B2, B8); flexible retail floorspace (Use Classes A1-A4); community and leisure floorspace (Use Classes D1 and D2); the construction of a new flood defence wall and delivery of ecological habitat adjacent to the River Thames and associated infrastructure; streets, open spaces, landscaping and public realm (including new park and SINC improvements); car, motorcycle and bicycle parking spaces and servicing spaces; utilities including energy centre, electricity substations and incidental works.

This is a major planning application, departure from the development plan and affects the setting of listed buildings and structures (see online for full details of listed buildings). The application is accompanied by an Environmental Statement for the purposes of Environmental Impact Assessment under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

LOCATION:

Land At Thameside West And Carlsberg Tetley
Dock Road
Silvertown
London

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Part II - Particulars of Decision

The London Borough of Newham hereby gives notice that OUTLINE PLANNING PERMISSION has been **REFUSED** for the carrying out of the development referred to in Part I hereof and as described and shown on plans and documents submitted with the application for the following reasons:

1. The proposed development has failed to adequately address the principles of masterplanning with particular attention to the successful integration of the scheme with the wider public area and the transition between, and neighbourliness of different uses both within the site and in relation to adjacent areas. The proposals also fail to provide adequate assurances for the delivery of the masterplan as a whole. This would likely fail to build and reinforce communities and places that work and to ensure that growth contributes to achieving convergence and personal and community resilience. This is contrary to:
 - the National Planning Policy Framework (MHCLG, February 2019); and,
 - Policies S1, S3, S4 and SP3 of the Newham Local Plan (December 2018).
2. The proposed development has failed to demonstrate good growth and infrastructure sufficiency with particular regard to provisions for the new DLR Station and primary education. This would have a detrimental impact on the ability to build strong and inclusive communities, make the best use of land, create a healthy city, deliver the homes that Londoners need, grow a good economy and increase efficiency and resilience and would not ensure that identified infrastructure needs are met. This is contrary to:
 - the National Planning Policy Framework (MHCLG, February 2019);
 - Policy 1.1 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policy SD1 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies S1, S3, S4 and INF9 of the Newham Local Plan (December 2018).
3. The proposed development introduces residential uses into a designated Strategic Industrial Location (SIL) and has failed to adequately demonstrate managed release and managed intensification. The proposals are therefore considered to erode the existing industrial quality of designated SIL and would be harmful to the supply of SIL and employment land across the Borough. This is contrary to:
 - the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 2.17, 4.1 and 4.4 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies E4, E5 and E7 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies S1, S3, S4, J1 and J2 of the Newham Local Plan (December 2018).
4. The proposed development introduces residential uses adjacent to a Strategic Industrial Location (SIL) as well as a nightclub and has failed to demonstrate adequate mitigation to protect the future occupants from the impacts of existing lawful operations. This has the potential to fetter the ongoing operation of both the SIL and the nightclub and thus the proposals have not demonstrated compliance with agent of change principles. This is contrary to:
 - the National Planning Policy Framework (MHCLG, February 2019);

- Policies D12, D13 and E5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies S1, S3, S4, J1 and SP8 of the Newham Local Plan (December 2018).
5. The proposed development has not given due regard to masterplanning and infrastructure sufficiency in the potential scenario of Thames Wharf remaining safeguarded. In this respect the proposals are considered to be premature in nature. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 1.1 and 7.26 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies S1, S3, S4, INF1 and INF9 of the Newham Local Plan (December 2018).
6. The proposed development fails to deliver the added value expected of all tall buildings because its design fails to integrate and positively contribute to its location and fails to make a positive contribution to convergence objectives. The proposed height, scale and massing would appear overbearing, bulky and incongruous and so would negatively impact the character, appearance and townscape of the surrounding area and would create a hostile environment at ground floor level. The proposal is therefore contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7 of The London Plan – The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies, D1, D2, D3 and D8 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies S1, S3, S4, SP1, SP2, SP3 and SP4 of the Newham Local Plan (December 2018).
7. The proposed development would unacceptably reduce the level of daylight and sunlight to neighbouring residential properties. This would be detrimental to the living conditions of existing residents and would represent an unneighbourly form of development. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 7.1, 7.4, 7.6 and 7.15 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policy D1 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies SP2, SP3 and SP8 of the Newham Local Plan (December 2018).
8. The proposed development has failed to demonstrate that it will achieve a BREEAM rating of 'Excellent' as required by Policy SC1. The development's failure to achieve sufficient Building Performance Standards would conflict with the clear objectives of the Development Plan Framework seeking to respond to climate change within developments. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 5.2 and 5.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policy SI2 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018); and,
 - Policies SC1 and SC2 of the Newham Local Plan (December 2018).

9. The proposed development comprises a significant number of studio units and also fail to demonstrate that 19.8% 3 bed homes for families by unit is the maximum amount that can be provided when taking into account viability. The proposed development therefore prejudices the ability to stabilise the community and reduce population churn with implications for convergence and feelings of community cohesion and safety within the borough. The proposed housing mix is harmful to Newham's strategic objective of sustaining mixed and balanced communities and would not sufficiently contribute to redressing the borough's housing stock in terms of prioritising family sized units over small units. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policy 3.8 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies H12 and H15 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies S1, H1 and SP3 of the London Borough of Newham Local Plan: (December 2018).
10. The Applicant has failed to demonstrate that 32.5% (based on units), on-site affordable housing represents the maximum reasonable amount of affordable housing that can be delivered on the site on a viable basis. The proposed development would therefore not accord with the Council's overriding objectives to build mixed and balanced communities that work and ensure that growth contributes to achieving convergence. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 3.9, 3.11 and 3.12 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies GG4, H5, and H6 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for public consultation December 2017 with minor suggested changes July 2018);
 - Policies H1 and H2 of the Newham Local Plan (December 2018).
11. The height, scale and massing of the proposal has resulted in an excessive density which goes far beyond optimising the use of the site. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policy 3.4 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policy D6 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies S1, SP3 and H1 of The London Borough of Newham Local Plan (December 2018).
12. The proposed development, by reason of the relationship with surrounding existing land uses, the layout, configuration and orientation of the proposed blocks and the distribution and position of the accessible units and their associated car parking spaces, would fail to provide an adequate standard of accommodation for future occupants. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policy 3.5 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies D4, D5 and D13 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies S1, S3, S4, SP1, SP2, SP3, SP8 and H1 of The London Borough of Newham Local Plan (December 2018).

13. The proposed development has not been accompanied by sufficient information to enable evaluation of existing road conditions and to project future impact on the local road network, in particular the impact on junctions. The proposals have therefore failed to demonstrate that they are acceptable in terms of highway safety. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).
14. The proposed development relies on the use of existing surrounding transport infrastructure however insufficient information has been provided to demonstrate appropriate accessibility to these transport nodes. This would be detrimental to pedestrian and cyclist safety. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).
15. The proposed development would be served by a road which fails to adopt a healthy street approach and thus would be detrimental to the pedestrian and cyclist experience as well as a successful integration of a new mixed-use neighbourhood in this location. This is contrary to:
- the National Planning Policy Framework (MHCLG, February 2019);
 - Policies 6.1 and 6.3 of The London Plan - The Spatial Development Strategy for London (GLA, consolidated with alterations since 2011 and published March 2016);
 - Policies T1, T2, T3, T4 and T5 of the Draft London Plan: The Spatial Development Strategy for Greater London (Draft for Consultation December 2017 with minor suggested changes July 2018);
 - Policies INF1, INF2 and SP8 of The London Borough of Newham Local Plan (December 2018).

The abovementioned policies can be viewed via the Council's website: www.newham.gov.uk.

Informatives

In forwarding the decision for this application, the applicant is advised of the following:

1. In dealing with this application, Newham Council has implemented the requirements of the National Planning Policy Framework and of the Town and Country Planning (Development Management Procedure) (England) Order 2015 to work with the applicant in a positive and proactive manner. As with all applicants, we have made available detailed advice in the form of our statutory policies in the relevant constituent parts of the Local Plan and London Plan, Supplementary Planning documents, and all other Council guidance, as well as offering a full pre-application advice service, so as to ensure that applicant has been given every opportunity to submit an application which is likely to be considered favourably.

Dated:

Signed:

Amanda Reid

Director of Planning and Development, Chief Planning Officer
London Borough of Newham
Newham Dockside, 1000 Dockside Road, London, E16 2QU

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TOWN AND COUNTRY PLANNING ACT 1990 (as amended)

Applicant's Rights following the Grant or Refusal of permission

1. Appeals to the Secretary of State

Should you (an applicant/agent) feel aggrieved by the decision of the council to either refuse permission or to grant permission subject to conditions, you can appeal to the Secretary of State for the Department of Communities and Local Government – Section 78 of the Town and Country Planning Act 1990 / Sections 20 and 21 of the Planning (Listed Building and Conservation Areas) Act 1990. Any such appeal must be made within the relevant timescale for the application types noted below, beginning from the date of the decision notice (unless an extended period has been agreed in writing with the council):

- **Six months:** Full (excluding Householder and Minor Commercial applications), listed building, conservation area consent, Section 73 'variation/removal', Section 73 'minor-material amendment', extension of time, and prior approval applications.
- **12 weeks:** Householder planning, Householder prior approval and Minor Commercial applications.
- **8 weeks:** Advertisement consent applications.
- **No timescale:** Certificate of lawful development (existing/proposed) applications.

Where an enforcement notice has been issued the appeal period may be significantly reduced, subject to the following criteria:

- The development proposed by your application is the same or substantially the same as development that is currently the subject of an enforcement notice: **28 days of the date of the application decision.**
- An enforcement notice is served **after the decision on your application** relating to the same or substantially the same land and development as in your application and if you want to appeal against the council's decision you are advised to appeal against the Enforcement Notice and to do so before the Effective Date stated on the Enforcement Notice.

Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>.

If you are unable to access the online appeal form, please contact the Planning Inspectorate to obtain a paper copy of the appeal form on tel: 0303 444 5000.

The Secretary of State can allow a longer period for giving notice of an appeal, but will not normally be prepared to use this power unless there are exceptional/special circumstances.

The Secretary of State can refuse to consider an appeal if the council could not have granted planning permission for the proposed development or could not have granted it without the conditions it imposed, having regard to the statutory requirements and provisions of the Development Order and to any direction given under the Order. In practice, it is uncommon for the Secretary of State to refuse to consider appeals solely because the council based its decision on a 'direction given by the Secretary of State'.

If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal. [Further details are on GOV.UK](#)

2. Subsequent Application Fees

No planning fee would be payable should a revised planning application be submitted within 12 months of the decision. This 'fee waiver' is permitted only where the new application meets the following criteria:

- the applicant is the same as the applicant of the original application
- site boundary is the same as the site boundary of the original application

- the nature of development remains the same.

3. Purchase Notices

Should either the council or the Secretary of State refuse permission or to grant permission subject to conditions, the owner may claim that the land cannot be put to a reasonably beneficial use in its existing state nor through carrying out of any development which has been or could be permitted. In such a case, the owner may serve a purchase notice on the council. This notice will require the council to purchase the owner's interest in the land in accordance with the provisions of Part IV of the Town and Country Planning Act 1990 and Section 32 of the Planning (Listed Buildings Conservation Areas) Act 1990.

4. Compensation

In certain circumstances compensation may be claimed from the Council if permission is refused or granted subject to condition(s) by the Secretary of State on appeal or on reference to the Secretary of State. These circumstances are set out in Section 114 and related provisions of the Town and Country Planning Act 1990 and Section 27 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

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Appendix 5

Research Report

Proposed Development at Thames Side West, Silvertown by Silvertown Homes Ltd and GLA Land and Property

Supplementary co-location update

1. Introduction

This supplementary report has been prepared by JLL for SHL and GLAP as an update on the co-location relationship between industrial and residential uses. It should be read in conjunction with JLL's initial Employment Floorspace Re-provision Statement, dated November 2018, relating to Phase 1 of the proposed development at Thames Side West, Silvertown.

Since JLL wrote the Employment Floorspace Re-provision Statement in November 2018 the industrial market in London has continued to evolve as the pressures on land have intensified. This has led to developers and investors considering intensifying industrial land (through increasing plot densities) across London. As of March 2020, JLL was aware of around 30 locations across London where intensification of industrial land is being considered including Thames Side West. Of these 30 locations 13 are considering developing industrial floorspace either alongside or below residential space. These developments are now being considered in London in locations where there is strong pressure on land from competing uses and there is a need to bring forward both new housing and to retain or provide new industrial floorspace to service the city.

This updated report covers the following:

2. How the co-location of industrial and residential uses has evolved in London over the last two years. This includes our insights from existing developments that have been built in London, or in cities on the European continent that we have visited.
3. Some observations on the types of planning restrictions we often see with industrial developments close to residential developments and how such restrictions may limit the marketability of a building to potential end users and adversely affect value.
4. Potential Industrial uses at the Proposed Development.
5. Conclusions.

2. How the co-location of industrial and residential uses has evolved in London over the last two years

When we initially wrote our November 2018 report the intensification of industrial land in London was still in its infancy. At that time, we were only aware of a handful of schemes where industrial land was being considered for intensification and this was for either multi-level development (where the access to upper levels is provided by internal cargo lifts) or multi-storey industrial intensification (where the access to upper levels is provided via a vehicle ramp to all or some upper levels but where internal cargo lifts may also be used) or through the use of intensifying land by co-location.

As stated above, at March 2020 JLL is aware of around 30 sites across London where investors or developers are considering intensifying land for industrial use. All of these sites are at various stages of consideration but the number of sites being considered highlights the continued pressure on industrial land in London and the need to find suitable solutions to allow the city to function efficiently and grow.

Over this time JLL has also set up a dedicated 'City and Urban Logistics' team based in London to look at and work on these intensified projects with an aim to help bring forward these new types of industrial products to London.

Understanding co-location developments where both industrial and residential uses are able to sit side by side (vertically or horizontally) on the same site is extremely important. Therefore, since we prepared our initial report members from the 'City and Urban Logistics Team' have been to Paris, Munich and Hamburg to look at existing developments that are already operational and to see how with the right building design and mitigation these developments can successfully provide good floorspace for a range of industrial, and other, companies to operate.

La Chapelle International – Paris

In Paris Sogaris, which is part owned by the local governments of Paris, has developed a 42,000 sq m mixed use development in the northern part of the city (18th arrondissement) called La Chapelle International which includes a 'logistics hotel'.

JLL visited this development in April 2019. The development has a rail terminal (which at the time of our visit was not operational), industrial floorspace on the ground floor which was being used by parcel delivery company DPD, a data centre and a cash and carry supermarket in the basement, plus offices, residential homes, a gym and restaurants all on the upper floors. These uses were all located on the same development and from viewing the development it was apparent that all the uses worked well together on the site.

This development in Paris has been used as a leading example across Europe to highlight that land intensification in densely populated areas can work. It has been referenced by the London Assembly at a London Assembly Transport Committee discussion as a leading scheme that should be looked at when

considering industrial intensification in London and referenced in documents by the City of London Corporation¹.

Images 1, 2 and 3 are of the development and show both an external photograph of the development and internal pictures of the industrial space within the development.

Image 1: La Chapelle International



¹ City of London Corporation Planning & Transportation: International Comparative Study – Final Report. London Assembly Transport Committee: discussion at c. 2hrs 20mins <https://www.youtube.com/watch?v=PcyJkix2k4c&t=3631s>

Image 2: La Chappelle International – DPD operating inside the building



Image 3: La Chappelle International – DPD operating inside the building



Gewerbehof – Munich and Hamburg

JLL visited Munich and Hamburg in February 2020 and looked at three buildings; Gewerbehof Laim – Munich, Gewerbehof Nord – Munich, and Gewerbehof Hamburg. These developments were all purely used for industrial use and we call them ‘multi-level’ industrial buildings which are effectively stacked industrial buildings where access to the upper floors is made via cargo lifts. These buildings were developed by the local Governments of Munich and Hamburg to encourage the growth of small businesses and they have been developed in built up areas where residential use already exists. Indeed, effectively these new developments were co-locating within close proximity of existing residential use. Image 4 is of Gewerbehof Hamburg and shows the close proximity of the residential and industrial uses.

Image 4: Gewerbehof Hamburg



There were a number of different occupiers operating out of Gewerbehof Hamburg including parcel, engineering, design and textile, clothes and fashion and automotive companies. Fellyfix Smart Repair Service was located in the building and the company specialises in car repairs, which would fall into B2 use. The development had been designed well to keep sound contained within each unit through its use of building materials. Whilst walking around the development we did not hear any loud noises and felt that the uses that were taking place within this development were not disturbing the surrounding area. This demonstrated that some B2 use could be located next to residential use where the right mitigation is used to mitigate both noise and smell.

Of the two buildings we viewed in Munich, one was still under construction (Gewerbehof Nord) and the second had been built in 2011 (Gewerbehof Laim). Both of these buildings were of very similar design to Gewerbehof Hamburg and sat near residential homes. Gewerbehof Laim had a number of similar types of occupiers to Gewerbehof Hamburg including furniture makers, carpentry, food manufacturers and automotive occupiers. When we looked around Gewerbehof Nord we understood from the Architect that they would also be looking to accommodate similar types of occupiers in this building once it completed.

The developments in Munich reinforced what we saw in Hamburg and showed us that, with the right building design and mitigation, these buildings with a combination of B1c, B2 and B8 use occupiers can co-locate near residential use.

Mount Pleasant Islington

Royal Mail and Taylor Wimpey are currently part redeveloping Royal Mail's sorting depot in Islington to provide a mixed-use co-location development of 336 new homes sitting above Royal Mail's sorting depot which spans across 14,150 sq m on basement and ground floor. Image 5 shows a cross section of this development. An acoustic roof deck is being built over the existing service yard to mitigate the noise between the operation taking place below and the residential use located above. The application for this redevelopment was submitted in 2015 and received planning permission. Whilst the site is under construction Royal Mail has still been operating out of the site.

Image 5: Mount Pleasant Islington



Source: Homes and Property <https://www.homesandproperty.co.uk/property-news/homes-of-the-future-unstoppable-rise-in-online-shopping-is-bringing-new-delivery-depots-to-central-a134296.html>

These examples from Europe and London demonstrate that it is possible to develop modern industrial space within close proximity of residential uses. As we wrote in our report in November 2018, if a scheme is

designed to mitigate the adverse impacts of an industrial activity (such as noise or vibration or smells and fumes) it is possible for certain industrial activities, including B2 and B8 to be compatible with residential. We still believe that this is the case.

3. Some observations on the types of planning restrictions we often see with industrial developments close to residential developments and how such restrictions may limit the marketability of a building to potential end users and adversely affect value

Restrictions on use, hours of operations and or deliveries, and noise are common for industrial developments that are close to residential and are typically imposed by way of planning conditions attached to a planning authority's Decision Notice. Restrictions on the number of deliveries in or out of a building (as opposed to, or in addition to, the timing of deliveries) are sometimes imposed but are less common and difficult to monitor. With respect to the main form of restrictions:

- restrictions on use may, for example, limit use to B1c and B2 but exclude B8, or permit B1c and B8 but exclude B2.
- restrictions on hours of operations may limit night-time operations, for example by permitting operations only between say 6.00 and 19.00 hours.
- restrictions on hours of deliveries may be combined with hours of operations restrictions or be treated separately, where the permitted hours of operations are different from the permitted hours of deliveries.
- restrictions on noise may limit noisy activities which generate noise above a certain level over the existing baseline / ambient noise level in the local environment, and or require mitigating measures such as acoustic fencing.

Where restrictions are imposed it is not uncommon for these to comprise a combination, or all, of the above. For example, St Modwen's Henley Business Park in Guildford was approved by the Council for B1, B2 and B8 use in 2017 but with a restriction that limited the amount of B8 to a maximum of 57% of the total gross floor area (to limit traffic) and with detailed restrictions on hours of operations and vehicle movement (to limit noise and disturbance). These included restrictions on the use of 'commercial vehicles' between 6.00 and 19.00 Monday to Friday, 08.00 to 13.00 on Saturdays and not at all on Sunday.

In our opinion, any type of restriction is likely to have some adverse impact on the marketability of a property to potential industrial / warehouse end users, and on value, but clearly some restrictions are likely to have a larger adverse impact than others.

In terms of use, an open B1c, B2, B8 use would appeal to the widest possible market, although B2 is not generally permitted near residential areas. While B1c uses do attract good demand in London generally, B8 activities are probably the main source of demand driven by the growing need to store and distribute materials and goods to support London's growing economy and population, including for e-commerce. Therefore, any significant restriction on the floorspace permitted for B8 use would adversely affect marketability at Thames Side West. As an example, the IO Centre that was developed on the Royal Arsenal site at Woolwich in the last property cycle (mid 2000s) was consented for B1c and B8 uses but with a restriction on the amount of B8 floorspace. At the time there

was strong demand for B1c uses, notably from printing businesses, but the B8 restriction did adversely impact marketability at the time and we believe that such a restriction would have a more seriously adverse impact if implemented today.

With respect to hours of operations / delivery restrictions, many operators - particularly in logistics - want the flexibility to operate 24/7. For example, a parcel company servicing final mile delivery to customers in London would typically receive inbound deliveries from a hub during the night (e.g. from say 2am to 3 am) and would then seek to start outbound dispatches from say 5am to 7 am. Other types of operators that might require to operate over night and make very early morning deliveries would include grocery chains and their suppliers, such as bakery businesses (a B1 c or B2 use depending on scale).

Whilst some operators can sometimes work around restrictions at a certain level (e.g. hours of operations and delivery restrictions from 6 am), the more restrictive the hours of operations/delivery restrictions are the more these will adversely affect marketability. This is likely to become more so as London moves towards a 24-hour economy.

With respect to noise level, although we are aware that best practice can significantly reduce noise levels, many quite common types of operations do create quite significant noise, including for example the movement of roll cages, beeping on reversing vehicles (which is mandatory on vehicles that are 7.5 m or longer) and refrigerated units used in cold or multi-temperature logistics activities. In addition, equipment used to fit or release wheels on cars, can create a relatively high level of noise and car repair and maintenance is a significant source of industrial demand in London. Clearly this is specialist area, with specialist British Standards' guidance and appropriate sound/acoustics consultants.

As stated, generally for the marketability of a building it would be better to have no restrictions but if some restrictions are put in place then consideration is needed around the types of occupiers which may wish to locate in Newham.

However, having said this, given that the industrial units proposed in Phase 1 of the scheme include an internal serviced yard which has been designed to mitigate noise and vibration, as stated in the Noise and Vibration Report, we do not feel any hours of operational or servicing restrictions should be placed on the industrial units in Phase 1. The design of the building should mitigate sound and vibration from the ground floor to the upper floors as stated in the Noise and Vibration Report which should allow an industrial occupier operate in the ground floor without creating a noise or vibration impact further up in the building.

4. Potential industrial uses at the Proposed Development

We previously stated in our November 2018 that Phase 1 of the development, units A and B could appeal to a range of industrial occupiers undertaking **light industrial activities (B1c)** including those that might wish to show case their products to customers. These could include a range of clean manufacturing and assembly activities (e.g. involving furniture, clothing, accessories etc) and even some food and drink manufacture/preparation (e.g. high-end craft foods and drinks). This type of space could also appeal to emerging new 'makers', including for example businesses using 3D printing to produce prototypes or models or finished goods.

We also stated in our November 2018 report that the space in Phase 1 would also be attractive to **storage and distribution occupiers (B8)**. We believe that the development could attract a wide range of occupiers including:

- e-fulfilment companies / last mile delivery
- logistics companies, including parcel companies
- general storage and distribution companies
- non-food retailers, requiring space for store fulfilment
- grocery retailers
- manufacturers requiring storage and distribution space for their finished goods
- wholesalers.

We consider that our observations on potential user demand in Section 5 of our report in November 2018 are still relevant on these uses.

In addition to this, in our November 2018 report we listed a range of **B2 uses** that we thought had the potential to be compatible for this development even though B2 uses are not by definition compatible with residential but with the mitigation that has been designed into this development a range of B2 uses could operate within it.

We listed a range of detailed industrial activities which are officially classified as Manufacturing in the Standard Industrial Classification and since our November 2018 report we feel that this list could be refined further. **Appendix 1** lists our refinement on these activities classified as manufacturing which we believe could be compatible because, in our understanding, the industrial processes involved in these activities would not typically give rise to adverse impact such as noise, vibrations and smells on such a scale or intensity that they could not be mitigated by appropriate design.

5. Conclusion

JLL still believes that land pressures in London are going to lead to new co-location industrial and residential developments being proposed in London and having looked at examples across London and continental Europe we can see that there are clearly cases where industrial uses can successfully co-locate with residential.

These developments will be successful where the appropriate mitigation has been put in place to mitigate both sound and noise vibrations in a building which will allow industrial use to operate near residential units.

In terms of restrictions on use, generally JLL believes that for the marketability of an industrial building it would be better to have no restrictions on use. However, if some restrictions were put in place then consideration is needed around the types of occupiers that the building is most likely to attract, given its size and location, and some flexibility should be considered around these restrictions so as not to undermine its appeal to these operators. However given that Phase 1 of the scheme has the appropriate mitigation in place for both noise and vibrations there is no need to place servicing or operational restrictions on the industrial units in Phase 1.

JLL has revised its view on the B2 uses that could be appropriate for this development and have listed these in Appendix 1. However JLL still believes that the B1c and B8 uses listed as appropriate uses for this co-location development in November 2018 are still appropriate today.

Appendix 1

Refined list of potentially compatible manufacturing activities

- 10.3 Processing and preserving of fruit and vegetables
- 10.31 Processing and preserving of potatoes
- 10.32 Manufacture of fruit and vegetable juice
- 10.39 Other processing and preserving of fruit and vegetables
- 10.71 Manufacture of bread; manufacture of fresh pastry goods and cakes
- 10.72 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes
- 10.82 Manufacture of cocoa, chocolate and sugar confectionery
- 10.82/1 Manufacture of cocoa, and chocolate confectionery
- 10.83 Processing of tea and coffee
- 10.83/1 Tea processing
- 10.83/2 Production of coffee and coffee substitutes
- 10.84 Manufacture of condiments and seasonings
- 11.0 Manufacture of beverages
- 11.01 Distilling, rectifying and blending of spirits
- 11.02 Manufacture of wine from grape
- 11.03 Manufacture of cider and other fruit wines
- 11.04 Manufacture of other non-distilled fermented beverages
- 11.05 Manufacture of beer
- 11.06 Manufacture of malt
- 11.07 Manufacture of soft drinks; production of mineral waters and other bottled waters
- 13.10 Preparation and spinning of textile fibres
- 13.20 Weaving of textiles
- 13.30 Finishing of textiles
- 13.9 Manufacture of other textiles
- 13.91 Manufacture of knitted and crocheted fabrics
- 13.92 Manufacture of made-up textile articles, except apparel
- 13.92/1 Manufacture of soft furnishings
- 13.92/2 Manufacture of canvas goods, sacks etc.
- 13.92/3 Manufacture of household textiles (other than soft furnishings of 13.92/1)
- 13.93 Manufacture of carpets and rugs
- 13.93/1 Manufacture of woven or tufted carpets and rugs
- 13.93/9 Manufacture of carpets and rugs (other than woven or tufted) n.e.c.
- 13.94 Manufacture of cordage, rope, twine and netting
- 13.95 Manufacture of non-wovens and articles made from non-wovens, except apparel

13.96 Manufacture of other technical and industrial textiles
13.99 Manufacture of other textiles n.e.c.
14.1 Manufacture of wearing apparel, except fur apparel
14.11 Manufacture of leather clothes
14.12 Manufacture of workwear
14.13 Manufacture of other outerwear
14.13/1 Manufacture of men's outerwear, other than leather clothes and workwear
14.13/2 Manufacture of women's outerwear, other than leather clothes and workwear
14.14 Manufacture of underwear
14.14/1 Manufacture of men's underwear
14.14/2 Manufacture of women's underwear
14.19 Manufacture of other wearing apparel and accessories
14.3 Manufacture of knitted and crocheted apparel
14.31 Manufacture of knitted and crocheted hosiery
14.39 Manufacture of other knitted and crocheted apparel
15.12 Manufacture of luggage, handbags and the like, saddlery and harness
15.20 Manufacture of footwear
16.29 Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials
18.1 Printing and service activities related to printing
18.11 Printing of newspapers
18.12 Other printing
18.12/1 Manufacture of printed labels
18.12/9 Printing (other than printing of newspapers and printing on labels and tags) n.e.c.
18.13 Pre-press and pre-media services
18.14 Binding and related services
18.2 Reproduction of recorded media
18.20 Reproduction of recorded media
18.20/1 Reproduction of sound recording
18.20/2 Reproduction of video recording
18.20/3 Reproduction of computer media
23.1 Manufacture of glass and glass products
25.7 Manufacture of cutlery, tools and general hardware
25.71 Manufacture of cutlery
25.72 Manufacture of locks and hinges
25.73 Manufacture of tools
25.9 Manufacture of other fabricated metal products
25.91 Manufacture of steel drums and similar containers

25.92 Manufacture of light metal packaging
25.93 Manufacture of wire products, chain and springs
25.94 Manufacture of fasteners and screw machine products
25.99 Manufacture of other fabricated metal products n.e.c.
26.1 Manufacture of electronic components and boards
26.11 Manufacture of electronic components
26.12 Manufacture of loaded electronic boards
26.2 Manufacture of computers and peripheral equipment
26.20 Manufacture of computers and peripheral equipment
26.3 Manufacture of communication equipment
26.30 Manufacture of communication equipment
26.30/1 Manufacture of telegraph and telephone apparatus and equipment
26.30/9 Manufacture of communication equipment (other than telegraph and telephone apparatus and equipment)
26.4 Manufacture of consumer electronics
26.40 Manufacture of consumer electronics
26.5 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
26.51 Manufacture of instruments and appliances for measuring, testing and navigation
26.51/1 Manufacture of electronic instruments and appliances for measuring, testing, and navigation, except industrial process control equipment
26.51/2 Manufacture of electronic industrial process control equipment
26.51/3 Manufacture of non-electronic instruments and appliances for measuring, testing and navigation, except industrial process control equipment
26.51/4 Manufacture of non-electronic industrial process control equipment
26.52 Manufacture of watches and clocks
26.6 Manufacture of irradiation, electromedical and electrotherapeutic equipment
26.60 Manufacture of irradiation, electromedical and electrotherapeutic equipment
26.7 Manufacture of optical instruments and photographic equipment
26.70 Manufacture of optical instruments and photographic equipment
26.70/1 Manufacture of optical precision instruments
26.70/2 Manufacture of photographic and cinematographic equipment
26.8 Manufacture of magnetic and optical media
26.80 Manufacture of magnetic and optical media
27.1 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus

27.11 Manufacture of electric motors, generators and transformers
27.12 Manufacture of electricity distribution and control apparatus
27.2 Manufacture of batteries and accumulators
27.20 Manufacture of batteries and accumulators
27.3 Manufacture of wiring and wiring devices
27.31 Manufacture of fibre optic cables
27.32 Manufacture of other electronic and electric wires and cables
27.33 Manufacture of wiring devices
27.4 Manufacture of electric lighting equipment
27.40 Manufacture of electric lighting equipment
27.5 Manufacture of domestic appliances
27.51 Manufacture of electric domestic appliances
27.52 Manufacture of non-electric domestic appliances
27.90 Manufacture of other electrical equipment
28.1 Manufacture of general-purpose machinery
29.32 Manufacture of other parts and accessories for motor vehicles
30.92 Manufacture of bicycles and invalid carriages
31.0 Manufacture of furniture
31.01 Manufacture of office and shop furniture
31.02 Manufacture of kitchen furniture
31.03 Manufacture of mattresses
31.09 Manufacture of other furniture
32.1 Manufacture of jewellery, bijouterie and related articles
32.11 Striking of coins
32.12 Manufacture of jewellery and related articles
32.13 Manufacture of imitation jewellery and related articles
32.20 Manufacture of musical instruments
32.30 Manufacture of sports goods
32.40 Manufacture of games and toys
32.40/1 Manufacture of professional and arcade games and toys
32.40/9 Manufacture of games and toys (other than professional and arcade games and toys) n.e.c.
32.50 Manufacture of medical and dental instruments and supplies
32.91 Manufacture of brooms and brushes
32.99 Other manufacturing n.e.c.
33.12 Repair of machinery
33.13 Repair of electronic and optical equipment
33.14 Repair of electrical equipment

Appendix 6

High-Level Strategy Note: Temporary Primary School Provision
(May 2020)

Introduction

- 1.1 Based upon the conclusions of Chapter 14 of the Environmental Statement Addendum (May 2020), the Applicants agree that the TSW Proposals should to provide permanent primary school capacity on site in order to mitigate the impact of the Proposals on local primary school infrastructure, once existing surplus capacity is deducted.
- 1.2 The Applicants have chosen to construct and fit-out a 4FE primary school on-site, however the school will not be delivered until Phase 9 of the scheme. The Applicants are therefore seeking to secure planning permission for a permanent on-site primary school, but also to pay a financial contribution to mitigate the primary school places generated by Phase 1. This will enable the Phase 1 residential development (including 401 homes) to be constructed without leaving any residual impact on local primary school infrastructure.
- 1.3 In terms of enabling the Phase 2 to 11 development (including 4,599 homes) to be constructed without leaving any residual impact on local primary school infrastructure, the Applicants proposed that a 'Primary School Mitigation Plan' (PSMP) is prepared by the Applicants and agreed by London Borough of Newham (LBN) prior to the construction of Phases 2 to 11. This PSMP will include:
- a) Up to date DfE figures on the primary school demand generated by Phases 2 to 11 of the Proposals;
 - b) Options on how the primary school demand generated by Phases 2 to 11 of the Proposals can be mitigated. The mitigation options could include providing a temporary school on-site and / or through payment of a financial contribution towards increasing permanent off-site primary school capacity;
 - c) Confirmation on the anticipated construction and completion of the permanent primary school on-site;
 - d) The specification for the permanent primary school on-site in consultation with LBN's Education consultant; and
 - e) The specification for the temporary primary school on-site in consultation with LBN's Education consultant.
- 1.4 The Applicants suggest that the above is set out in a legal obligation contained with the over-arching Section 106 Agreement.

Potential Location for Temporary School

1.5 Although nothing has been agreed at this stage, if a temporary school is provided on-site this is likely to be provided:

- In the ground floor area of Buildings A and B (circa. 3,600 sqm) which will be available from circa. June 2022 upon the completion of Phase 1; and / or
- In the public park which will be delivered as part of Phase 4 (in circa. September 2024, if not earlier if this land is released earlier by TfL's Silvertown Tunnel Contractor).

Indicative Timing of Temporary School

1.6 The PSMP will include clarity on the public transport and highway capacity if the temporary primary school provision is progressed on-site. At the time of preparing this high-level note (May 2020), the following information is available to provide initial feedback on this matter:

- Phase 1 (69 pupils) is likely to be completed by circa. June 2022;
- Park land area becomes available in circa. September 2022;
- Phase 2 (81 pupils) is likely to be completed by circa. May 2023;
- Phase 3 (81 pupils) is likely to be completed by circa. April 2024;
- Phase 4 (55 pupils) is likely to be completed by circa. September 2024;
- Phase 5 (62 pupils) is likely to be completed by circa. July 2025;
- Phase 6 (71 pupils) is likely to be completed by circa. April 2026;
- Phase 7 (90 pupils) is likely to be completed by circa. July 2027;
- Phase 8 (93 pupils) is likely to be completed by circa. May 2028; and
- Phase 9 (including primary school) is likely to be completed in circa. April 2029.

1.7 The above information explains that:

- a) Assuming the temporary primary school is to be constructed on the Site following the completion of Phase 1, and when assuming the temporary school requires at least 6-months to construct and fit-out from when the park land area becomes available (Sept 2022 + 6-months = March 2023), the primary school will be available in readiness for the pupils generated by the occupation of Phase 2 development (May 2023); and
- b) As a worst case scenario the temporary primary school will need to accommodate up to 533 children, generated by Phase 2 to 8. The basis that each form of entry

(FE) for a primary school equates to 210 children, the temporary primary school will need to allow for 3FE and include ancillary play facilities.

- c) As a worst-case scenario the temporary primary school may need to be place for as long as 7 years (between 2022 and 2029). Subject to ongoing discussions with TfL and its Silvertown Tunnel contractor (Riverlinx), there is an expectation that the permanent primary school could be delivered significantly sooner than 2029 and therefore the time needed for a temporary primary school would be less than 7 years.

Transport Capacity

1.8 The Applicants have discussed the temporary primary school proposals with their Transport Consultants (Buro Happold). They have concluded that the impacts of providing a (permanent) primary school as part of the Thameside West development have already been assessed as part of the transport assessment work and mitigation strategy undertaken for the planning application. The impacts of a (temporary) school with less pupils would be less than the permanent state and therefore would not equate to additional impacts / mitigation requirements. Notwithstanding, the timing of the provision of transport improvements secured as part of the development will need to be aligned with the earlier provision of the temporary school, where practical, to ensure that an appropriate level of accessibility by sustainable modes, particularly walking and cycling is in place in the short term. Overall, it is considered that with suitable mitigation measures aligned with the provision of the temporary school, this proposal will:

- Not result in a significant / unacceptable additional impact on public transport capacity;
- Not result in a significant / unacceptable additional impact on trip generation as a result of the service vehicles, drop-offs and pickups and the 5 x wheelchair accessible bays); and
- Not result in a significant / unacceptable additional impact on trip generation as a result of construction vehicles.

The Planning Process

1.9 The PSMP will include clarity on the process of securing the relevant permissions if a temporary school is provided on-site. This will require the Applicants to:

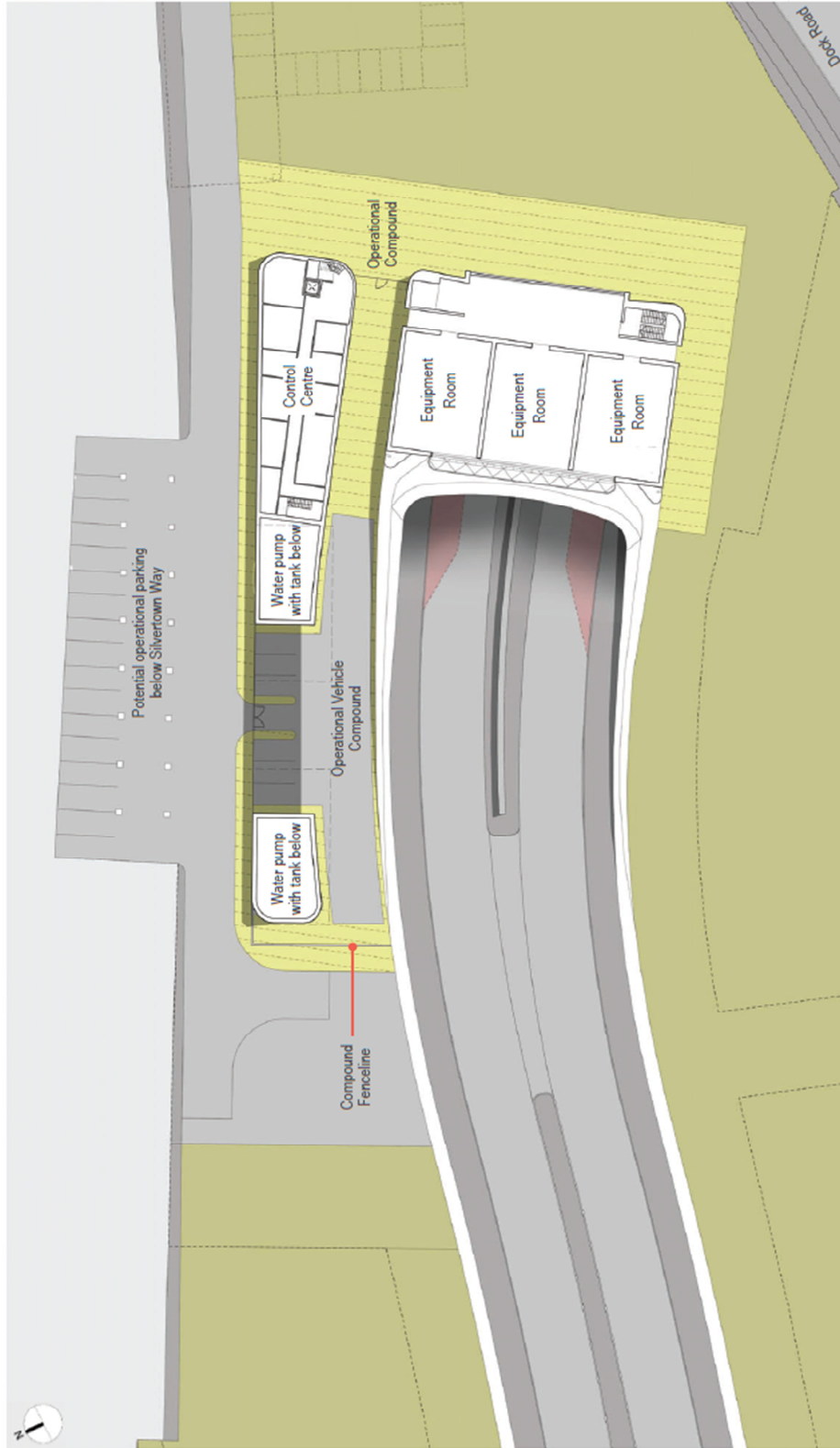
- Undertake pre-application discussions with LBN’s Education, Planning and Transport Teams;
- Undertake pre-application discussions with Transport for London (TfL);
- Undertake pre-application discussions with LBN’s Design Review Panel and LBN’s appointed TSW Design Champion on the design, scale and appearance of the temporary primary school;
- Prepare and submit a detailed planning application to LBN for the temporary school over a reasonable period of time (e.g. 7-yrs+), by which time the permanent primary school will have been constructed; and
- Ensure the planning application is supported by the necessary application material (to be agreed by LBN), including:
 - A Site Location Plan;
 - Drawings;
 - Design & Access Statement;
 - A Transport Assessment Addendum (including cumulative assessment);
 - A Framework School Travel Plan; and
 - An assessment of how the temporary primary conforms to DfE standards.

1.10 Due to the complex nature of land availability related to the Silvertown Tunnel works, it is currently unclear when land would become available for provision of a temporary school on the site. This is why the Applicants are seeking to secure planning permission for a permanent on-site primary school, but also to pay a financial contribution to mitigate the primary school places generated by Phase 1 and to agree a Primary School Mitigation Plan (PSMP) for the development from Phase 2 onwards, until the permanent school is constructed. The Applicants, therefore, seek agreement to this flexible approach which will be controlled by LBN through the Section 106 Agreement and a separate planning application for the temporary primary school once there is more certainty over land availability.

1.11 This flexible approach will ensure that each phase of the development can be constructed without leaving any residual impact on local primary school infrastructure.

End

Appendix 7



FOR FURTHER INFORMATION ON THE PROPOSALS, PLEASE VISIT:
WWW.THAMESIDEWEST-PLANS.CO.UK