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2 March 2018

Greater London Authority
City Hall
18 The Queen's Walk
London
SE1 2AA

Dear Sir / Madam

**GREATER LONDON AUTHORITY – DECEMBER 2017 DRAFT LONDON PLAN
REPRESENTATIONS ON BEHALF OF STANDARD LIFE INVESTMENTS
GALLIONS REACH SHOPPING PARK, ARMADA WAY, LONDON, E6 7ER**

These representations are submitted on behalf of Standard Life Investments (SLI), acting on behalf of the owners of Gallions Reach Shopping Park in LB Newham.

Standard Life Investments bought Gallions Reach Shopping Park on behalf of the owners in 2006. Since its purchase our client has implemented, and continues to implement a number of asset management initiatives in order to improve the overall appearance of the park and also improve the tenant mix on offer. These asset management initiatives have been undertaken within the context of wider ambitions for the long term transformation of Gallions Reach into a Major Town Centre to include a wider range of uses.

The submission of these representations on behalf of Standard Life Investments form part of the longer term management and development aspirations for Gallions Reach Shopping Park and the wider area.

Chapter 2 – Spatial Development Patterns

Figure 2.1 and 2.7

Whilst we recognise that under the Town & Country Planning (London Spatial Development Strategy) Regulations 2000, these key diagrams are representations of policy and not to be applied literally, the current DLR alignment shown on Figure 2.1 and the alignment shown on Figure 2.7 are inconsistent. Figure 2.1 appears to show the potential northern alignment of the DLR route (our client's favoured alignment) whilst Figure 2.7 shows a more southerly alignment which our client does not support.

We and other key stakeholders strongly favour the northern alignment and our client has identified a suitable route. It has also identified a possible station location on land owned by Standard Life Investments (**Appendix 1**) which has been shared with TfL and the GLA.

As such, the alignment on Figure 2.7 should be revised to show the northern alignment to be consistent with Figure 2.1. and the potential station location in **Appendix 1**.

In addition Figure 2.1 denotes Gallions Reach shopping centre as part of a Strategic Industrial Location. The Site in our client's ownership is a retail use and a suitable symbol should be added to both Figure 2.1 and 2.7 to denote the proposed future Major Town Centre at Gallions Reach.

Thames Estuary North and South

Paragraph 2.1.37

We strongly support the recognition within the Draft Plan of the Thames Estuary as a priority for regeneration and economic development with the potential of over 250,000 new homes and 200,000 new jobs.

Paragraph 2.1.41

We agree that the lack of river crossings is holding back growth and development and urge the GLA to prioritise the delivery of new crossings, in particular the DLR extension from Gallions Reach to Thamesmead and Abbey Wood.

Royal Docks and Beckton Riverside Opportunity Area

We note that the title of the relevant section of the Draft Plan (para 2.1.46 onwards) is titled "Royal Docks OA". This should be changed to reflect the full title of the Opportunity Area i.e. "**Royal Docks and Beckton Riverside OA**" if the Opportunity Area is not to be split into two separate Opportunity Areas.

We note that the Royal Docks and Beckton Riverside OA is one of the largest identified in the Draft Plan and set to deliver 30,000 homes and 41,500 jobs and the opportunity sites are widely distributed, largely along the Newham Riverside. Our view is that development capacity is likely to be conservative. A considerable amount of new development has already come forward in the Royal Docks Area, including the Royal Albert Dock development, Royal Wharf, Silvertown Quay, Barrier Park East and Pontoon Dock.

In contrast, less development has yet to come forward at Gallions Reach and we consider the area faces a unique set of the challenges and opportunities that are distinct from those areas around the Royal Docks. As such, we consider that the Royal Docks and Beckton Riverside should be considered as separate opportunity areas to ensure that the Beckton Riverside/Gallions Reach receive sufficient strategic support to deliver as many new homes and jobs as possible in the shortest timeframe. This reflects that the capacity to support additional development in the Beckton Riverside area has yet to be explored fully and is likely to result in the identification of additional capacity for homes over the plan period.

We note that the Draft Plan only provides the global development numbers for each opportunity area but that the Working Draft of the Royal Docks and Beckton Riverside OAPF (February 2016) indicates that the Gallions Reach Shopping Park and Beckton Riverside Partial SIL Release is expected to deliver 5,000 new homes and 10,000 jobs. Our initial capacity work and discussions with the adjoining landowners indicate the capacity for

new homes in the area is significantly higher (potentially over 20,000 new homes). By creating a separate OA for Beckton Riverside/Gallions Reach, it will ensure that the area reaches its full potential in terms of the delivery of new homes and jobs.

Paragraph 2.1.49

We welcome the reference to new residential development and the evolution of Gallions Reach Shopping Park to become a town centre but the text should be altered to reflect the commitment to a major town centre in this location. The third sentence should be revised to state:

*"New Residential development here will support the evolution of Gallions Reach Shopping Centre, which has the potential to become a designated **major** town centre."*

It is important to recognise the hierarchy of town centres in this area of London with Gallions Reach major town centre playing a strategic role.

Paragraph 2.1.49 states that the Planning Framework should set out how new development can accommodate an extension to the DLR across to Thamesmead which Standard Life Investments supports. Notwithstanding this, the text should also refer to other key transport interventions, in particular the opportunity for revised bus routes and more frequent services on exiting routes to Gallions Reach. Given the commitment to establish Gallions Reach Shopping Park as a Major Town Centre and provision of a new DLR Station, it would be a missed opportunity not to reconsider bus routes and capacity in the area to ensure future capacity is sufficient and ensure an appropriate interchange between the DLR and bus services. As such, paragraph 2.1.50 should be revised to state:

*"The Planning Framework should set out how new development can accommodate an extension to the DLR across to Thamesmead **and reconfigure bus services to maximise public transport trips to the new Gallions Reach town centre..**"*

Thamesmead and Abbey Wood OA (Paragraph 2.1.52)

We welcome the recognition of the importance of the proposed DLR extension from Gallions Reach not just to the Beckton Riverside OA but also to support high density development at Thamesmead, which strengthens the business case for the DLR extension serving Gallions Reach and Thamesmead even further. Notwithstanding this, we would be concerned if the proposed extension is in anyway contingent on the timing and delivery of development at Thamesmead which faces a very different set of challenges when compared with Gallions Reach.

Policy SD7 Town Centre Network

We welcome the recognition that the changing role of town centres should be proactively managed in relation to the town centre network as a whole with the designation of new centres being used to address deficiencies in the town centre network.

The policy notes that classification of major centres can only take place via the London Plan. Where Local Authorities have already undertaken extensive research and have provided justification for centres being designated as major centres they should be designated as such in the new London Plan. This new town centre will support growth and change in the Gallions Reach area.

The supporting text at paragraph 2.7.3 notes that:

"It is important that any changes or additions to the town centres network are supported by robust evidence, particularly looking at the wider impact on the network, informed by regular town centre health checks, and undertaken alongside reviews of town centre boundaries."

With regard to Gallions Reach Shopping Centre the Council recognised in its 2012 Core Strategy the longer term aspiration for it to become a Major Centre and this has been carried forward into its most recent draft of the Local Plan. Therefore Standard Life Investments considers that Gallions Reach should be allocated as a Major Centre in the London Plan in recognition of the long term aspiration of the Council, and ongoing work by our client to deliver a comprehensive redevelopment including residential development, and other town centre uses.

Policy SD7(G) of the 2012 Core Strategy requires boroughs and other stakeholders to have regard to the broad policy guidelines for individual town centres in Annex 1. Table A1.1 (Town Centre Network) identifies that Gallions Reach has potential to be classified as a Major Centre in the future. Table 1 (below) provides a summary of the classification for Gallions Reach and the description of what this means for development going forwards.

Table 1: Gallions Reach

Future Potential Network Classification – Major	Typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sq m of retail, leisure and service floorspace with a relatively high proportion of comparison goods to convenience goods. They may also have significant employment, leisure, service and civic functions.
Commercial Growth Potential – Medium	Includes town centres with moderate levels of demand for retail, leisure or office floorspace, and with physical and public transport capacity to accommodate it.
Residential Growth Potential - High	All town centres have potential for residential growth, either within or on the edge of the town centre. Table A1.1 provides strategic guidance for the relative potential for residential growth for the International, Metropolitan, Major and District centres and CAZ clusters, indicating whether they would be likely to be able to accommodate high or medium levels of residential growth, or incremental residential

	development. This is a broad strategic-level categorisation that has been informed by the SHLAA and Town Centre Health Check, and takes into consideration the potential for impacts on heritage assets. Boroughs should be planning proactively to seek opportunities for residential growth in and around town centres, in particular using mechanisms set out in Policy SD8, informed by detailed assessments of town centre capacity and complementing approaches set out in town centre strategies.
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Paragraph 2.7.4 notes that in order for retail parks dominated by large format stores and heavily reliant on car travel to be reclassified within the retail hierarchy it is necessary for there to be a clear strategy to secure a broader mix of store sizes and a wider variety of uses.

Figure 2.17 contains details of the existing Town Centre Network, future centres should also be included on this plan in order to provide an overall visual representation of the distribution of existing and future centres.

Policy SD8 Town centre: development principles and Development Plan Documents

We welcome the approach set out in Policy SD8(A4) with regard to encouraging Local Authorities to consider the potential of retail and leisure parks to deliver housing intensification through redevelopment. However, this should not be at the cost of the effective and efficient operation of the retail park in the short and medium term. Also, the introduction of new uses such as residential should not prejudice the operation of existing uses for example because of amenity concerns arising from deliveries. It is essential that the GRSP Park retains the flexibility to undertake short and medium term assessment management initiatives in order to be able to respond to changes in the market and tenant demand.

Work is currently being undertaken on preparing a masterplan to consider the future residential development potential of the site and surrounding area, improved transport accessibility and an increased mix of uses. Flexibility is required in order to ensure that the park remains robust whilst this work is being undertaken. This will ultimately ensure that when the future development comes forward it is supported by a strong retail offer an essential base for the evolution into a major town centre. The Plan needs to be sufficiently responsive and flexible in order to ensure that the development of the new major centre is not unduly delayed. The supporting text at paragraph 2.8.3 recognises the need for flexibility stating that:

"This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate. Some edge-of-centre retail parks may be appropriate for a wider range of employment uses, subject to sequential testing and impact assessment."

This flexibility should be included in the policy to ensure that asset management initiatives can be brought forward including where these may involve an increase in retail and associated uses floorspace in order to ensure continuing competitiveness and providing a strong basis upon which to serve existing and future residents.

These changes should be recognised as an important part of the natural progression and change of centres, just as such change would occur in a defined centre.

We support Policy SD8(B) that requires boroughs to include within their development plans policies to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of centres. The requirement for development plans to identify suitable sites for higher density mixed-use residential intensification and the comprehensive redevelopment of low-density supermarket sites, surface car parks and edge-of-centre retail / leisure parks is supported. Paragraph 2.1.49 (in relation to the Royal Docks Opportunity Area) recognises that new residential development at Gallions Reach will support its evolution to becoming a designated centre.

Policy SD8(C) requires development proposals to relate to the size and role of the centre and its catchment. The retail provision at Gallions Reach currently provides the attraction and facilities to form a strong basis upon which to build a new major centre. This would not be reliant upon extending the extent of its catchment area to the potential detriment of other established centres.

It is essential that short and medium term asset management initiatives are supported in order to maintain the centres function and retain the strong basis to build the future major town centre.

In order to enable Gallions Reach to evolve to become a major town centre it is important to ensure that the requirements are not too prescriptive in terms of when there will be an increase in floorspace or the exact mix of uses that will be proposed. Standard Life Investments need to be able to respond to changes in tenant and shopping habits. There may be a need to increase the range of uses and amount of floorspace in advance of the allocation as a centre and the potential residential development coming forward.

Policy SD9 Town centres: Local partnerships and implementation

Policy SD9(C2) encourages local authorities to take a proactive and partnership approach to bring sites forward for redevelopment. This approach is supported in order to ensure that successful development is delivered.

Chapter 4 – Housing

Policy H1

We strongly support Part B(2) of the policy which encourages boroughs to optimise the potential for housing delivery on brownfield sites through the DPDs and planning decisions especially from sources such the mixed-use redevelopment of car parks and low-density retail parks.

Policy H6

Whilst we support the aim of the Policy, to provide a potential fast track route for development, we consider the proposed threshold (35% and 50%) for affordable housing should only be treated as thresholds for the purposes of assessing viability. S106/CIL payments should only be sought to mitigate direct impacts and should not affect materially the development's viability or the proportion of affordable housing.

If land owned by our client is made available for infrastructure such as the potential DLR station, then the policy should reflect that it would be appropriate for CIL liabilities to be removed or obviated.

A DLR station site would bring significant public benefits beyond that necessary to make the development acceptable in planning terms reflecting any proposed residential development at GRSP can appropriately be brought forward before the DLR. Therefore the Policy H6 should reflect that the affordable housing thresholds should recognise explicitly that they should not be treated prescriptively where payments in land such as land for significant public benefits is made available.

We suggest that the policy is amended to take account of the often significant infrastructure challenges and unique circumstances often face in Opportunity Areas and set out how such requirements will be taken into account in respect of affordable housing requirements.

Policy H13

We support the thrust of this policy which provides a fast track viability assessment route for Build to Rent properties, bringing the tenure in line with for sale housing. Notwithstanding this, the comments set out above in relation to Policy H6 also apply to Policy H13.

Chapter 6 – Economy

Policy E9 Retail, markets and hot food takeaways

This policy recognises that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of the Plan, particularly for town centres. The requirement in Policy E9(B) for boroughs to identify future requirements and locations for new retail development is supported.

Chapter 10 – Transport

Policy T3

We support Policy T3. The DLR extension to Gallions Reach and Abbey Wood should also be listed as a priority project in Section D of the Policy and therefore wording should be amended as follows:

*"In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings, **the extension of the DLR from Gallions Reach to Abbey Wood and Thamesmead** and an eastward extension of the Elizabeth Line.*

Table 10.2 Minimum Cycle Parking Standards

We are concerned regarding the proposed further increase in cycle parking requirements for one bed homes. We question that there is sufficient demand for this quantity of cycle parking. We are aware that a large number of residential cycle stores across London are significantly underused. The current cycle parking requirements are difficult to successfully accommodate into developments, often resulting in reduced active frontage at ground floor, which conflicts with the Mayor's design policies. In addition, it reduces the amount of space within developments which can be used to provide homes, including affordable units, which directly conflicts with the Mayor's agenda to maximise the number of units delivered across London. The proposed increase in cycle parking for one bed units from 1 space per unit to 1.5 spaces per unit will further exacerbate the current design and land use issues despite no evidence that there is demand for additional cycle parking spaces.

Annex 1 Town Centre Network

The identification of Gallions Reach as a future major centre at Figure A1.1 is welcomed. However, for the reasons set out above it should be identified as being a major centre now to enable commensurate growth to be permitted by the Local Planning Authority.

Closing

If you require any further information please do not hesitate to contact Julian Stephenson at this office.



Montagu Evans LLP

Table of Proposed Amendments

Policy	Title	Amendment
SD7C	Town Centre Network	The classification of International, Metropolitan and Major town centres can only be changed through the London Plan <u>with the exception of those centres identified as having the potential for change and having been supported by a robust evidence base prepared by the Local Authority supporting this allocation.</u>
Figure 2.17	Town Centre Network	<u>Emerging centres should be included on this map in order to enable a graphic representation of the provision of future centres across London.</u>
Para 2.1.49		New Residential development here will support the evolution of Gallions Reach Shopping Centre, which has the potential to become a designated <u>major</u> town centre.
Para 2.150		The Planning Framework should set out how new development can accommodate an extension to the DLR across to Thamesmead <u>and reconfigure bus services to maximise public transport trips to the new Gallions Reach town centre.</u>
SD8A(4)	Town Centres: Development Principles and Development Plan Documents	Development Plans and development proposals should take a town centres first approach by realising the full potential of existing out of centre retail and leisure parks to deliver housing intensification through redevelopment and ensure locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location having regard to pars A(1), (2) and (3) above. <u>A net increase in retail or leisure floorspace will be permissible where it can be demonstrated that this is part of a wider overall asset management initiative and that other elements of the wider development are being progressed.</u>
SD9	Town Centres: Local Partnerships and Implementation	No proposed changes
E9	Retail, Markets and Hot Food Takeaways	No proposed changes
T3	Transport capacity, connectivity and safeguarding	In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings, <u>the extension of the DLR from Gallions Reach to Abbey Wood and Thamesmead</u> and an eastward extension of the Elizabeth Line.
Annex 1		Gallions Reach should be identified as a Major Centre at this stage

Appendix 1
Proposed DLR Location



ALTERNATIVE STATION LOCATION PROPOSAL

