

Examination of the London Borough of Newham

**Detailed Sites and Policies Development Plan
Document**

Written Statement of London City Airport

11 April 2016

1. Introduction

1.1 London City Airport ("the Airport") has previously made representations on the emerging drafts of the London Borough of Newham's (LBN) Detailed Sites and Policies Development Plan Document (DPD) at Issues and Options Stage; Pre-Publication Stage; and on the Proposed Submission DPD.

1.2 In these representations it was requested that LBN include, inter alia, strategic policy support for the principle of a new Crossrail Station at Silvertown linked to London City Airport as well as serving the local businesses and residents of the Royal Docks. Whilst the Airport's representations were largely addressed, policies were not revised to provide support for the proposed Crossrail Station at Silvertown in the DPD submitted to the Planning Inspectorate for examination on Friday 11 December 2015. Copies of the Airport's previous representations on the emerging drafts are included at **Appendix 1**.

1.3 As explained in the following sections of this written statement, in the absence of any policy support for a new Crossrail Station, the DPD is considered by the Airport to be unsound in that it has not been prepared in a sufficiently positive manner, or fully taken into account the future infrastructure needs for the Borough.

1.4 The DPD should be modified to include policy support for the principle of a new Crossrail Station at Silvertown if it is to fully meet the criteria set out at paragraph 182 of the National Planning Policy Framework (NPPF) and plan for the future strategic infrastructure needs of the Borough.

2. Background to Proposed Crossrail Station

2.1 In March 2014 and prior to the preparation of the emerging drafts of the DPD, the Airport commissioned Allies and Morrison (master-planners and architects) and Atkins (rail engineers) to carry out a study examining the feasibility of a new Crossrail Station that would be linked to the Airport whilst also serving the local residents and businesses in North Woolwich/Silvertown and across the Royal Docks.

2.2 The proposed location of the station, shown on Figure 1 below, would be immediately to the south of the Airport where the Crossrail1 line intersects Connaught/Albert Road and Factory Road in Silvertown. The feasibility study concluded that a new privately funded station would be feasible and deliverable. A copy of the Feasibility Study is included at **Appendix 2**.

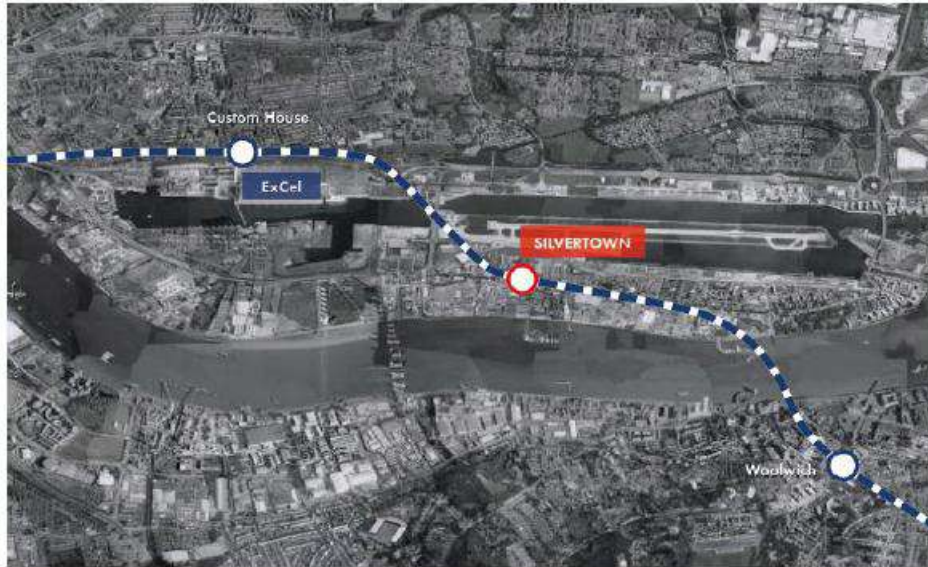


Figure 1: Location of Proposed Crossrail Station at Silvertown

2.3 In summary, the study found that a new station at Silvertown would be:

- *feasible, fundable and could be built without any negative impact on the Crossrail project;*
- *located broadly where the former Silvertown North London Line station was, therefore close to London City Airport DLR station allowing a major transport hub to be created;*
- *within walking distance of significant development sites and regeneration potential and could be seen as the next big move in the Royal Docks unfolding vision and regeneration strategy; and*
- *provide significant benefits to the local community and presents a placemaking opportunity to help transform the area into a new piece of city which would be well connected and plugged into existing transport infrastructure.*

2.4 A Crossrail Station at Silvertown would have a transformative effect and would help to unlock the full development potential of more peripheral sites in the Royal Docks. There is currently little prospect of regeneration for residential and mixed use purposes in the south eastern part of the Docks despite the Royal Docks' designation as an Opportunity Area in the London Plan; the imperative for growth and prosperity inherent within the Enterprise Zone status of the Royal Docks; and the proximity of some of the most deprived communities in London. The immediate area around the Airport remains one of the most deprived areas in the UK¹ characterised by higher levels of unemployment than the rest of London. Hence, increasing local employment and regeneration remains a key priority locally.

2.5 The Greater London Authority are currently consulting on an Opportunity Area Planning Framework for the Royal Docks which identifies plans to deliver an additional 25,500 new homes and 60,000 new jobs in the Royal Docks including sites immediately southwest of the Airport (and adjacent to the proposed location of the Silvertown Crossrail Station) at Silvertown Quays and Thamesmead East. A Crossrail Station has the potential to underpin such growth and regeneration.

¹ Department of Communities and Local Government, *English Indices of Deprivation – Statistical Release 2015*

2.6 Support for the proposed station is strong, indeed the London Borough of Newham previously wrote to the Airport expressing in principle support for a new Crossrail Station. In correspondence from the Mayor of Newham addressed to Declan Collier, CEO of London City Airport, it was noted that a station serving both the Airport and residents across the Borough would lead to *“increased connectivity and would help the Council realise its long-term vision for regeneration of the area.”* (see **Appendix 3**).

2.7 A recent survey of 1,000 London businesses carried out in March 2016 by ComRes on behalf of the Airport found that 85% of businesses think that a Crossrail Station at Silvertown would have a positive impact on business. Similarly, of 1,000 Newham residents surveyed, 84% support a Crossrail Station at Silvertown.

2.8 Additionally, many landowners and businesses across the Royal Docks support the principle of a Crossrail Station at Silvertown, acknowledging the contribution it would make in terms of delivering strategic infrastructure, regeneration and growth to the area. Supporters of the proposed station include the Silvertown Partnership and Ballymore both of whom are currently advancing mixed-use and residential developments in the area that could be served by the new Crossrail Station. Letters from both encouraging policy support are attached at **Appendix 4**.

3. Sites and Policies DPD (Submission Version)

3.1 The preparation of the DPD presents an opportunity to identify a new strategic transport infrastructure hub for Newham through ‘in principle’ policy support. Such infrastructure would include the new Crossrail Station at Silvertown which is both feasible and deliverable and supported by LBN and other businesses across the Royal Docks, all of whom acknowledge the connectivity, employment and regeneration it would bring to the area.

3.2 The DPD must meet the relevant soundness criteria in the National Planning Policy Framework (NPPF) including being positively prepared. It should also be consistent with policy as set out in the Borough’s Core Strategy. Without support for a Crossrail Station at Silvertown, it does not meet these criteria.

3.3 Firstly, with respect to Paragraph 182 of the NPPF requires that: *“a local planning authority should submit a plan for examination which it considers is “sound” – namely that it is: **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development...”* With respect to Plan Making, paragraph 156 of the NPPF states that: *“Local Planning Authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver... the provision of infrastructure for transport.”*

- 3.4 Secondly, LBN's Core Strategy itself under Policy INF1 seeks through Objective 6.186 *"to secure investment in strategic transport networks that will lever investment and regeneration into Newham, further integrating the borough with the rest of London and overcoming major physical barriers to movement without having an unacceptable impact on residents."* It goes on to state that *"support will be given to other, currently unfunded, strategic transport proposals that will contribute towards Newham's regeneration and economic and physical development"*
- 3.5 The above policies in the NPPF and the Borough's Core Strategy support the identification of strategic transport infrastructure to assist the Borough's ongoing regeneration and to stimulate inward investment. This would support the inclusion of 'in principle' policy support for strategic infrastructure projects in the DPD, such as the proposed Crossrail Station at Silvertown. In the absence of such support the 'Infrastructure' policy in the DPD is currently unsound and fails the test of being prepared in a sufficiently positive manner, nor does it take into account the future infrastructure needs for the Borough.
- 3.6 Additionally, the Airport's Commission Final Report (July 2015) notes that a key opportunity for London City Airport in the coming years will be Crossrail infrastructure providing faster travel times between east and west London. At Para 16.52 the Commission states that it *"expects London City Airport to take advantage of these opportunities, while taking into account the needs of its local residents, to reinforce the airport's valuable connectivity and specialist business travel provision for London"*.
- 3.7 This opportunity to provide new transport infrastructure and deliver increased connectivity and regeneration can be partly addressed by the inclusion of in principle policy support in the DPD.
- 3.8 It is noted that in Appendix 2 of the Statement of Consultation for the DPD, Officers comment that policy support is premature while the benefits of a Crossrail Station remain unproven and neither operator support/funding have not yet been secured. However, as explained above, a previous study has found the station to be feasible and deliverable subject to operator support and securing funding. This will provide a major transport interchange that will be a catalyst for the future regeneration and connectivity of the Royal Docks.
- 3.9 Whilst it is accepted that further detailed assessment is required as well as securing funding and operator support for the station, this position is not unusual for the preliminary stages of strategic infrastructure projects and this should not preclude express policy support for the principle of a new Crossrail Station at Silvertown in the DPD, as is endorsed in Policy INF1 of the Core Strategy referred to above.
- 3.10 In summary, express policy support for the principle of a Crossrail Station at Silvertown would be consistent with the Borough's already stated recognition of its potential benefits - increasing connectivity and realising the vision for regeneration of the area.

4. Requested Modification to DPD

- 4.1 Strategic 'in principle' policy support for a new Crossrail Station will ensure that the infrastructure policy of the DPD is sound and satisfies the criteria set out at paragraph 182 of the NPPF, namely being "positively prepared". Sufficient evidence and reasoned justification exists to confirm that a Crossrail Station is deliverable and will bring increased connectivity and regeneration to the Borough. The station is supported by the Council, businesses and residents of Newham and it is therefore requested that the DPD is modified to include a new strategic infrastructure policy that supports the principle of a new Crossrail Station at Silvertown. It is submitted that policy support as follows is appropriate:

Infrastructure - New Policy INF 11 - "The Council supports the principle of an additional Crossrail station at Silvertown (Connaught Road/Albert Road) to enhance connectivity to local communities and London City Airport and contributing to the regeneration of the Royal Docks.

Any planning application proposals which prejudice the achievement of this objective will be resisted."

**Appendices Accompanying Written Statement of
London City Airport on Detailed Sites and Policies
Development Plan Document**

Appendix 1

Previous Representations on Emerging Sites and Policies Development Plan Document

Proposed Submission Consultation - Detailed Sites & Policies DPD

This is the 'regulation 19' consultation on the Proposed Submission Draft Detailed Sites & Policies DPD – as such we are asking specifically for representations regarding the soundness of the document, rather than more general opinions (the DPD has previously been through two rounds of 6-week public consultation, Jan-Feb 2015 and July-Aug 2015).

The tests of soundness are set out at paragraph 182 of the NPPF, summarised as: positively prepared, justified, effective, and consistent with national policy.

If you believe the DPD is unsound in its current form please tell us why – with as much detail as possible – by filling in the following form. You can make as many comments as you wish by copying / pasting the cells - please ensure distinct issues are covered by separate comments.

Whilst your comments can be taken into account *without* contact details, if you wish to be notified regarding the further completion of this document and the Local Plan generally, please provide your details below:

Name	Tim Halley
Company (if relevant)	London City Airport
Representing (if relevant)	London City Airport
Address / postcode if resident or submissions are in relation to a single site	Click here to enter text.

If you wish to appear at examination in regards to these comments please provide your email address (this will be used by the programme officer during scheduling of examination hearings)

Email address	tim.halley@londoncityairport.com
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These representations must be sent to ldf@newham.gov.uk by midnight on **Friday 6th November**. Submissions received after the deadline will not be accepted.

If you wish to make more than four distinct comments please submit an additional form

Comment Number 1

Under which test do you contend the DPD is unsound? (delete as appropriate)

positively prepared

To which part of the DPD do these comments relate? (please be specific and identify the relevant policy / paragraph or designation type / site details)

Infrastructure Policy

Please set out the reasons for your representations in relation to legal compliance and soundness only. Please be as precise as possible

London City Airport has previously made representations on the emerging draft of the Detailed Sites and Policies Development Plan Document (DPD) both at Issues and Options Stage and on the Pre-Publication Draft. In these representations it was requested that the Council include policy support for a new Crossrail Station at Silvertown, as well as safeguarding associated land on the Proposals Maps. In our earlier representations we also noted the Councils previous correspondence expressing in principle support for a new Crossrail Station adjacent to the Airport. The Councils correspondence (re-attached for ease of reference) noted that a new Crossrail Station serving both the Airport and residents in the Borough would lead to "increased connectivity and would help the Council realise its long-term vision for regeneration of the [Silvertown/North Woolwich] area." It is disappointing therefore that no such policy allocation or safeguarding of appropriate land has been included in the Proposed Submission Draft of the DPD. We note Officers comments in the consultation schedule that safeguarding of land for a new station is considered premature while the benefits remain unproven and neither operator support/funding have not yet been secured. A previous study carried out by Allies and Morrison (master planners and architects) and Atkins (rail engineers) on behalf of the Airport in March 2014 concluded that a new station is feasible and deliverable. The feasibility study is re-attached for reference. Further detailed assessment is required as well as securing funding and operator support for the station. However, this position is not unusual for the preliminary stages of infrastructure projects and this should not preclude the Council from at least expressing strategic policy support for the principle of a new Crossrail Station at Silvertown. Support towards a station in the plan would be consistent with the Councils already stated recognition of its potential benefits. Taking such an approach would also ensure that the Plan is consistent with the National Planning Policy Framework (NPPF) in terms of soundness and being positively prepared. Paragraph 182 of the NPPF requires that "a local planning authority should submit a plan for examination which it considers is "sound" – namely that it is: Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development..." Additionally, with respect to Plan Making, paragraph 156 of the NPPF states that "Local Planning Authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver... the provision of infrastructure for transport." In the absence of any strategic policy support for a new Crossrail Station at Silvertown, it is our view that the policies within the DPD are currently unsound and have not been prepared in a sufficiently positive manner, or taken into account the future infrastructure needs for the Borough. Strategic policy support for the station will ensure that the DPD is positively prepared. Sufficient evidence and reasoned justification exists to confirm that a Crossrail Station is deliverable (see attached study) subject to securing requisite funding and it is not therefore considered premature to include policy support for Crossrail at this stage. It is requested that

strategic policy support for the principle of a new Crossrail Station at Silvertown is included in the DPD as follows: Infrastructure Policy INF [XX] "The Council supports the principle of an additional Crossrail station at Silvertown (Connaught Road/Albert Road) to enhance connectivity to local communities and London City Airport. Any planning application proposals which prejudice the achievement this objective will be resisted."

Comment Number 2

Under which test do you contend the DPD is unsound? (delete as appropriate)

positively prepared, justified, effective, consistent with national policy

To which part of the DPD do these comments relate? (please be specific and identify the relevant policy / paragraph or designation type / site details)

[Click here to enter text.](#)

Please set out the reasons for your representations in relation to legal compliance and soundness only. Please be as precise as possible

[Click here to enter text.](#)

Comment Number 3

Under which test do you contend the DPD is unsound? (delete as appropriate)

positively prepared, justified, effective, consistent with national policy

To which part of the DPD do these comments relate? (please be specific and identify the relevant policy / paragraph or designation type / site details)

[Click here to enter text.](#)

Please set out the reasons for your representations in relation to legal compliance and soundness only. Please be as precise as possible

Click here to enter text.

Comment Number 4

Under which test do you contend the DPD is unsound? (delete as appropriate)

positively prepared, justified, effective, consistent with national policy

To which part of the DPD do these comments relate? (please be specific and identify the relevant policy / paragraph or designation type / site details)

Click here to enter text.

Please set out the reasons for your representations in relation to legal compliance and soundness only. Please be as precise as possible

Click here to enter text.

If you wish to make more than four distinct comments please submit an additional form

07 August 2015

Consultation on the London Borough of Newham's Pre-publication Draft of the Detailed Sites and Policies Development Plan Document (DPD)

London City Airport (the airport) submits the following representations on the London Borough of Newham's (LBN) Pre-publication Draft of the Detailed Sites and Policies Development Plan Document (DPD) (July 2015). The airport previously submitted representations on 'Issues and Options' Draft DPD dated 27 February 2015. Subsequent discussions were also held with Officers dated 18 June 2015.

Background

London City Airport

London City Airport is the UK's leading business airport serving 46 destinations across the UK, Europe and USA. We enjoy a unique location at the heart of the Royal Docks within the London Borough of Newham, just two miles from Canary Wharf (12 minute travel time by DLR) and six miles from the City of London (22 minute travel time by DLR).

The airport is one of the biggest employers in Newham with c. 2,000 on-site employees, almost a third are Newham residents and two thirds are from within 5 miles. Our annual growth continues to increase with 2014 proving to be the airports busiest ever year - handling 3.65 million passengers and over 75,600 aircraft movements.

On 3 February 2015, LBN's Strategic Development Committee resolved to grant planning permission for the City Airport Development Programme (CADP) but subsequently refused the application following a direction from the Mayor of London, contrary to the recommendation of his Officers. The airport has since appealed the decision to the Secretary of State.

CADP would provide much needed infrastructure and extended passenger processing facilities at the airport and would allow us to grow to meet demand whilst increasing local job opportunities by creating 2,000 new jobs.

Existing Core Strategy Policy

The Detailed Sites and Policies DPD will sit within the policy context set by Newham's Core Strategy (2012). Policy INF1 of the Core Strategy is supportive of proposals which

optimise existing capacity and states that future growth at the Airport will need to be carefully considered to ensure that potential impacts on the Royal Docks and its future role and function are taken into account. Policy INF1 also requires development proposals to have regard to the airports **Safeguarded Areas** and **Public Safety Zones** (PSZ). Paragraph 6.200 states that future growth at the airport will need to be carefully considered in respect of any enlarged PSZ and the implications on the future role and function of the Royal Docks.

The airport operates a comprehensive Safeguarding Policy to ensure it is consulted on any planning applications within land identified on the 2004 Aerodrome Safeguarding Map

Development around the airport is also controlled by the PSZ contour published by the Department for Transport (DfT) in 2011. This shows an outer boundary (the 1 in 100,000 risk contour) and an inner core (based on the 1 in 10,000 risk contour). These may change as a result of the CADP proposals. The basic policy objective of the DfT (set out in DfT Circular 01/2010 'Control of Development in Airport Public Safety Zones') is that there should be no increase in the number of people living working or congregating in PSZs and that, over time, the number should be reduced as circumstances allow.

Previous Reps on Issues and Options Draft

The summary below sets out the content of airports reps on the Issues and Options Draft and how these have been addressed in the Pre-publication Draft:

1. **Allocation of Lands for Crossrail Station** – it was requested that LBN identify and safeguard land for a new potential Crossrail Station at Silvertown through policy and allocation of appropriate land on the Draft Policies Map.

Response in Pre-publication Draft: No allocation has been proposed in the Pre-publication Draft. In this regard, the Statement of Consultation - Comments Log stated: *"No station is proposed by TfL at this location. Required safeguarding boundaries are shown on the Policies Map. No change... Inclusion of detailed information to be considered for a future SPD"*

2. **Site Allocations at 'Albert Island'** – the Issues and Options Draft suggested that the 'Albert Island' lands are allocated as a Local Industrial Location (LIL) for employment/industrial uses. The airport noted that only a very small number of uses would be permissible due to the location close to the eastern end of the runway and within the PSZ.

Response in Pre-publication Draft: LIL option taken forward to Pre-publication Draft. No specific reference to PSZ constraint.

3. **Site Allocations at 'Eastern Airport Lands'** – the Issues and Options Draft suggested that the lands are also allocated as a LIL. These lands sit within the

eastern extent of the airport. The airport welcomed this allocation in principle and suggested lands for commercial type employment uses as well to allow flexibility for future employment creation.

Response in Pre-publication Draft: LIL option taken forward to Pre-publication Draft. No specific reference to commercial type employment uses.

4. **Airport Related Policies** – whilst specific airport policy is covered in the Core Strategy, the airport welcomed the better explanation/visibility of constraints, including specific mention of the PSZ and payments in lieu of biodiversity provision where sites are location in proximity to the airport. Similar references to the airports safeguarded surfaces were also encouraged.

Response in Pre-publication Draft: PSZ constraint acknowledged in Policy SP9, off-site Biodiversity Payments identified under Policy SC5. No reference to safeguarded surfaces.

5. **Other Infrastructure** – the airport welcomed protection for mooring points for river bus services on the Draft Policies Map.

Response in Pre-publication Draft: protection for mooring points taken forward and identified on the Proposed Submission Draft Policies Map.

Representations on Pre-publication Draft

1. Allocation of lands for new Silvertown Crossrail Station

The airport is disappointed that LBN has not taken the opportunity in the Pre-publication Draft DPD to identify lands for a new Crossrail station at Silvertown.

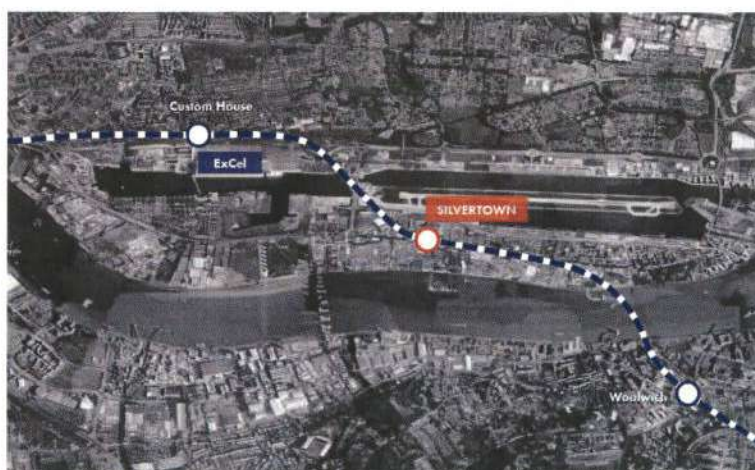


Figure 1: Potential Silvertown Crossrail Station

As set out in our previous representation (February 2015) and discussed with Officers, LBN has previously written to the airport to confirm support in principle for a new Crossrail station at Silvertown (see Appendix 1: correspondence from Sir Robin Wales to our Chief Executive Officer, Declan Collier dated 05 February 2015). This correspondence noted that a station serving both the airport and residents would lead to increased connectivity and would help the Council realise its long-term vision for regeneration of the area.

This stage of the emerging DPD presents a strategic opportunity for LBN to identify a new transport infrastructure hub for Newham through policy and allocation of appropriate lands. Once again, the airport strongly urges the Council to identify and safeguard land for a potential Crossrail Station (as shown on Figure 2 below) on the Draft Policies Map..

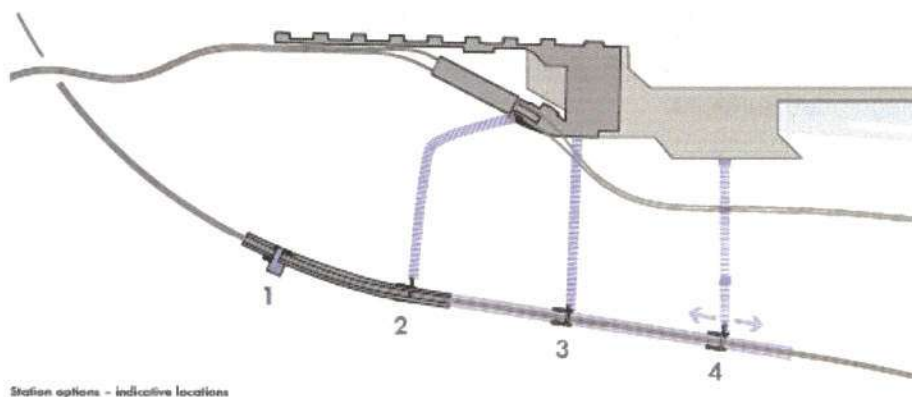


Figure 2: Potential locations for Crossrail Station

As set out in our previous representation (February 2015) the airport commissioned Allies and Morrison and Atkins to conduct a feasibility study and this concluded that a new Crossrail station is feasible. The feasibility study has been provided to LBN Officers and is attached to Appendix 2 for ease of reference.

Support for a new Silvertown station has been evident in discussions with members of the local community via the London City Airport Consultative Committee; local members of Parliament/members of the Transport Select Committee; and other landowners around the Royal Docks.

A new station is key to unlocking the full development potential of other major residential and mixed-use sites in the area and it would also underpin the future potential and employment intensification of the river side industrial sites as part of an airport and logistics hub. Importantly, it also has the potential to offset the significant local impact that the wider Crossrail project has had on the local community.

A new station would bring significant local benefits by redressing severance caused by Crossrail and help to provide an attractive and necessary connection across the railway. Related and/or over station development could also accommodate a range of uses that

would provide significant local regeneration and employment benefits for local communities as well as much needed services and amenities.

Further the Airport's Commission Final Report (July 2015) notes that a key opportunity for London City Airport in the coming years will be Crossrail infrastructure providing faster travel times between east and west London. At Para 16.52 the Commission states that it *"expects London City Airport to take advantage of these opportunities, while taking into account the needs of its local residents, to reinforce the airport's valuable connectivity and specialist business travel provision for London"*.

It is requested that Officers, reconsider allocation and safeguarding of lands for a new Crossrail Station on the Draft Policies Map.

In addition it is requested that Officers give further consideration and support to options to improve the connectivity between the airport and the new Crossrail Station and Customs House. Further discussions on this are sought with Officers to ensure the regeneration of the Docks fully capitalises on these key infrastructure transport nodes.

2. LIL Site Allocations

'Albert Island'

The Pre-publication Draft takes forward the Albert Island lands as proposed LIL12. These lands are located immediately east of the runway and within the airports PSZ.

Part 2: Spatial Allocation and Designations described LIL's as *"...coherent areas of land with existing or forthcoming employment uses. They exhibit land use conformity with Strategic Industrial Locations (SIL) and a number of sites are contiguous to SIL. They are in sustainable locations with good access to the road network and, as far as possible, do not have an adverse impact on sensitive uses such as residential areas. They contain purpose built commercial industrial space suitable for Small and Medium sized Enterprises (SMEs), small to large standard specification warehouse units generally used for B1c, B2, B8 uses and sui generis waste management and transport related uses. It is considered these sites meet or have potential to meet the needs of SMEs, start-ups and businesses requiring more affordable workspace and warrant protection because of their existing or potential local industrial type function."*



Figure 3: Albert Island Lands and Lands East of LCY

As set out in more detail in our previous representations (February 2015), LIL12 is located close to the airport, approximately 230m from the eastern end of the runway under the eastern take-off/approach route. A large proportion of the Albert Island lands are located within the airports the inner boundary of the 1 in 10,000 PSZ risk contour with part of the lands also located within the outer 1 in 100,000 PSZ risk contour.

The airport acknowledges that some low intensity employment uses such as parking and open storage may be appropriate on LIL12 but such uses must be cognisant of the constraints of the existing and future PSZ and the airports safeguarded areas. These will have a significant influence on the type, scale and intensity of any future activity on LIL12.

It is again requested that the constraints of the PSZ on LIL 12 are expressly acknowledged and that the types of development considered appropriate are clarified in the context of the DfT Circular 01/2010 'Control of Development in Airport Public Safety Zones'.

'Land East of London City Airport'

The Pre-publication Draft takes forward the lands East of London City Airport as a proposed LIL5. The lands comprise 6.9 Ha located east of the existing airport buildings, south of KGV Dock and within the London City Airport landholding. The airport welcomes the LIL allocation and notes the potential for further employment creation at through B1, B2 and B8 development and other complimentary uses.

As previously noted, we also consider that the lands would be suitable in the longer term for commercial redevelopment, increasing employment and complementing the airport/LIL uses across the wider site. It is therefore again requested that the Council promotes a mix of both industrial and some non-industrial (including commercial) employment at LIL5. This would allow for future flexibility in terms of the type of employment that could come forward on the site and may be facilitated by clarifying potential uses under any LIL allocation or allocating the lands as a Local Mixed Use Area.

The CADP proposals, currently under appeal, envisage this area being used for car parking, a new taxi feeder park together with various ancillary landside buildings and upgrades to dockside walkways. It is expected, subject to permission being granted, that these dockside facilities will be complete by 2022. Part or all of these lands therefore may not come forward for employment uses during the period of the Plan. However this allocation would allow for the longer term redevelopment for employment uses as appropriate.

'HSG29 – Rymill Street, E16'

The Pre-publication Draft takes forward lands at Rymill Street as a proposed Housing Site (HSG29). The site extends to c.54Ha and is located immediately south of the DLR/King George V Station and to the southeast of the airport (see figure 4 below). The site is subject to a long-term leasehold owned by London City Airport.



Figure 4: Rymill Street Site outlined in purple

The site is large and is located in a highly accessible location, immediately next to the DLR station. It is therefore considered suitable for a range of intensive land uses, including residential.

Whilst we welcome in principle the allocation of the site for housing development, there is also scope for employment led mixed use development on part/all of the site. It is therefore requested that site 'HSG29 – Rymill Street' is allocated for 'residential led mixed-use development, similar to a number of other Housing sites as identified in the Pre- publication draft.

3. Airport Related Policies

SP9 – 'Recognising Cumulative Impact'

We welcome the recognition of the PSZ constraints in draft Development Management Policy SP9 – 'Recognising Cumulative Impact' which states that *"...Uses, including residential, which draw in large numbers of people compared with the present situation, will not be supported within Public Safety Zone (Airport), in line with policy INF1."*

It is suggested that this policy should reflect the DfT Circular 01/2010 (as set out Part 2: Spatial Allocations and Designations of the Draft DPD) in stating that there should be no increase in the number of people living working or congregating in PSZ's and that, over time, the number should be reduced as circumstances allow. The PSZ contours are shown on Figure 1 of Part 2: Spatial Allocations and Designations – these appear to be erroneous. The existing PSZ contours are attached at Appendices 3a (west) and 3b (east) and should be those presented at Figure 1.

It is also suggested that reference should be made in Policy SP9 to the airports safeguarded surfaces. It is paramount that development has regard to the safeguarded surfaces which are protected in order to control obstacles that penetrate the surfaces in order to protect aircraft in flight. The airport should be consulted on any development proposals, in accordance with the ODPM Circular 1/2003 and the 2004 Aerodrome Safeguarding Map.

SC5 – 'Maximising Sustainable Design'

Draft Policy SC5 at para 9 states that: *All development should protect and enhance the biodiversity value and growing conditions of a site. Applications that create one or more residential units or pertain to 500 sqm or more GIA of any non-residential use should be accompanied by a Biodiversity Statement that ... (e) sets out proposals for any off-site payment(s) in lieu to a relevant provider where it is not possible to maximise biodiversity improvements on site or adequately mitigate impacts within the confines of the site due to conflict with safe airport operation.*

We fully support this policy that will assist with the continued safe operations of the airport.

Policies Map

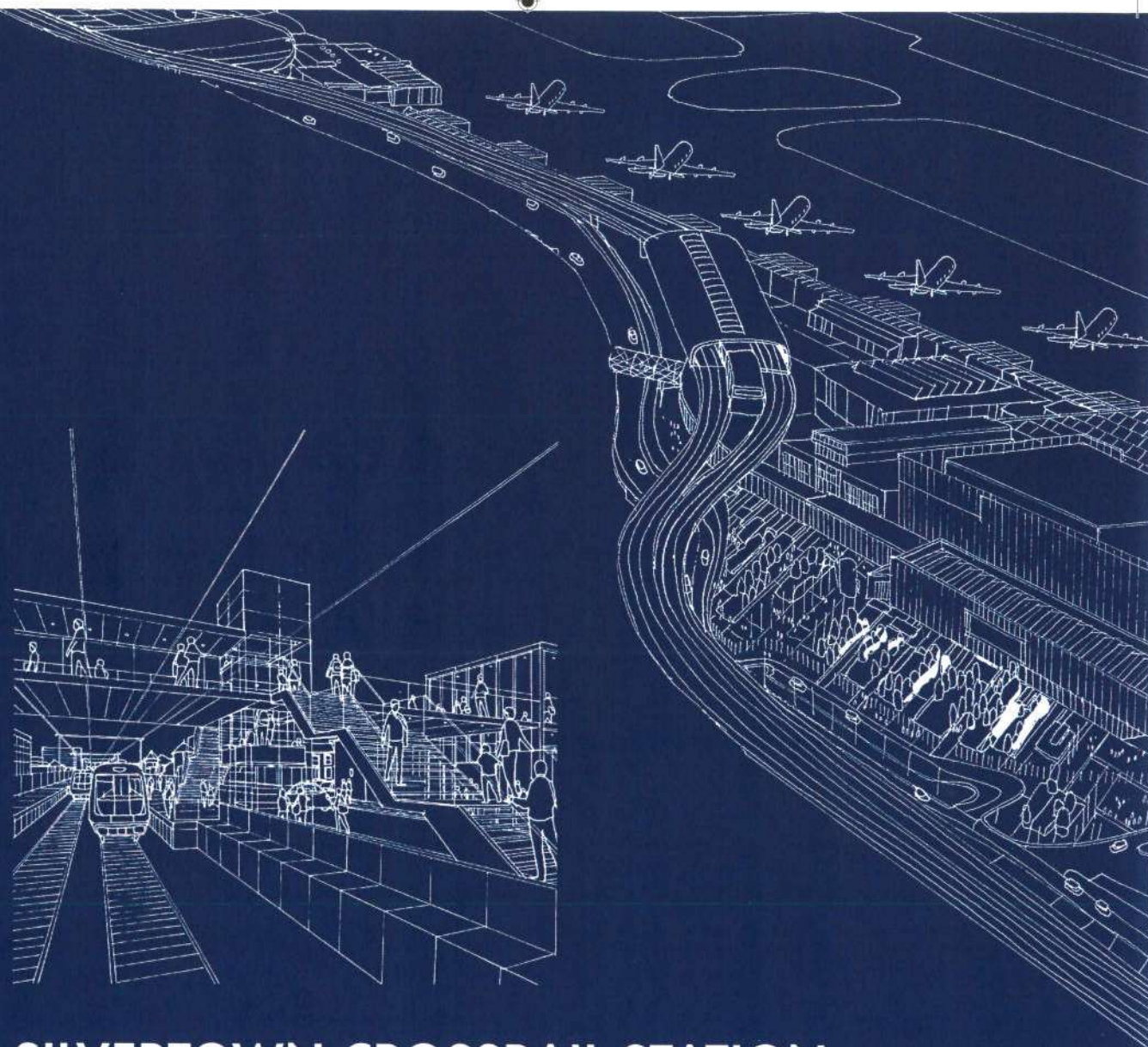
The protection of mooring points for the river bus services as set out on the Proposed Submission Draft Policies Map is welcomed. Key to achieving increased use of public transport at the airport will be the availability of multi-modal public transport infrastructure, including river bus services.

We trust that the above comments will be taken into consideration. As noted above, we would be grateful to meet with Officers to discuss all of the above representations.

Appendix 2

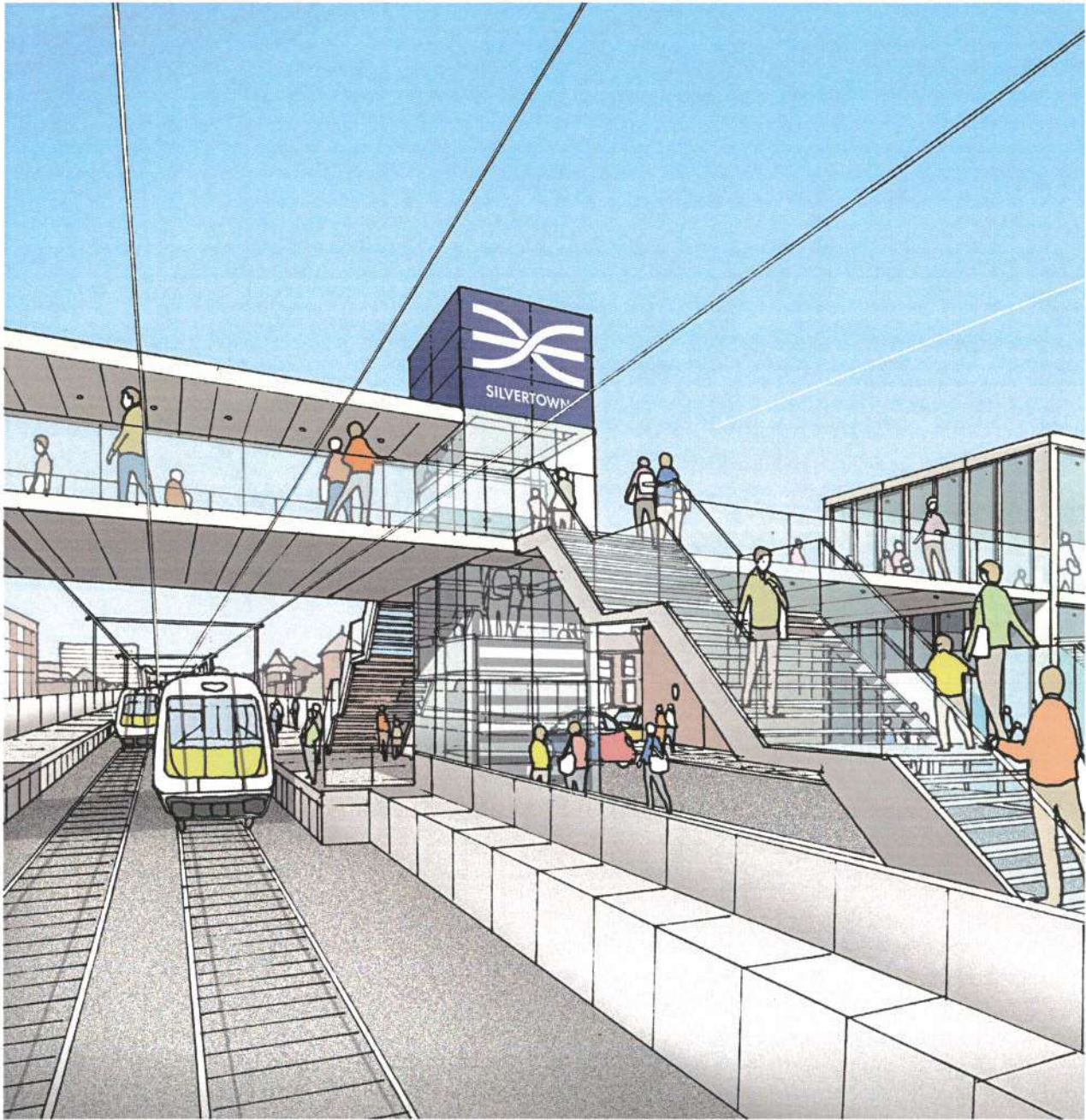
Crossrail Feasibility Study

Appendix 2
Crossrail Feasibility Study



SILVERTOWN CROSSRAIL STATION

MARCH 2014



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WHY BUILD A STATION AT SILVERTOWN?

Providing a Crossrail station at Silvertown is feasible, fundable and could be built without any negative impact on the Crossrail project.

Located broadly where the former Silvertown North London Line station was, the new station would be close to London City Airport DLR station allowing a major transport hub to be created.

It would be within walking distance of significant development sites and regeneration potential and could be seen as the next big move in the Royal Docks unfolding vision and regeneration strategy.

It could provide significant benefits to the local community and presents a placemaking opportunity to help transform the area into a new piece of city which would be well connected and plugged into existing transport infrastructure.



Former North London Line Silvertown station



Crossrail under construction



London City Airport and Canary Wharf

A major transport hub

A Crossrail station at Silvertown would establish a major transport interchange in the Royal Docks – airport, rail, DLR, bus, taxi - providing hugely improved sustainable access and free up DLR capacity. It would connect London's business airport with Heathrow bringing improved strategic international access and it would bring journey time improvements to Canary Wharf and The City, both of which would be dramatic with clear knock on benefits to Newham's and London's economy.

A catalyst for regeneration

This can also be seen as, and presented as, the next big move in the Royal Docks unfolding vision and regeneration strategy. It would be the key to unlocking the full potential development of the major residential and mixed-use sites in the area and it would also underpin the future potential and employment intensification of the river side industrial sites as part of an airport and logistics hub.

A place making opportunity

A Silvertown Crossrail Station has the potential to resolve the significant local impact that the Crossrail project has on the local community. It would bring benefits by bridging the severance caused and providing an attractive and necessary connection across the railway. Related and / or over station development could accommodate a range of uses that would provide significant local regeneration and employment benefits for local communities as well as much needed services and amenities.

How will a new station impact on Crossrail?

Funding led by private sector

The funding of a new station will be led first and foremost by a consortium of key developers around the Royal Docks.

It won't interfere with completing Crossrail by 2018

It won't delay the completion of the Crossrail project in 2018 because it will be built after this date. However passive provision for the new station could be considered, making the construction as cost efficient and least disruptive as possible.

It won't adversely impact Crossrail train timetable

There are no significant operational barriers to a new station, because a stop at Silvertown is on one of the (relatively) least busy sections of Crossrail.





CONTEXT

Crossrail will deliver a major new heavy-duty suburban rail service for London and the South-East. It will connect the City, Canary Wharf, the West End and Heathrow Airport to commuter areas east and west of the capital and to the north and south via Farringdon. It will provide easier, quicker and more direct travel opportunities across the capital for the first time via new railway lines and tunnels. Crossrail will not only provide London and the South East with a world-class, high capacity railway, it will ease congestion on London's public transport system, provide better access to the capital and also generate significant employment opportunities by encouraging regeneration and social inclusion and providing access to thousands of job opportunities.

The main civil engineering construction works for Crossrail are planned to complete in 2017. Crossrail services will commence on the central section by late 2018 followed by a phased introduction of services along the rest of the Crossrail route over several months.

The new **Custom House station** is the only surface station on the Crossrail central section. It is located north of the Royal Victoria Dock one stop from Canary Wharf. The station will welcome regional and international visitors to London's largest conference centre ExCeL, and create a transport interchange with DLR and local buses.

The station will provide a focus for the regeneration of the wider and local areas, in line with London Borough of

Newham's aspirations and the Canning Town and Custom House Masterplan. Custom House station provides a useful reference both in terms of design requirements and likely costs associated with the station itself, but also to the relationship between the station, the local community and wider regeneration context.

The Crossrail route follows the old North London Line close to London City Airport. It will run at grade between portals, one near the old Silvertown station to the southwest of the airport to another close to the North Woolwich terminus, to the southeast. A **Silvertown station** would be feasible along this grade level stretch.

There are a number of considerations in identifying possible locations: space to accommodate station platforms and ticket hall; platform length; proximity to the airport DLR station; proximity to the airport terminal; the physical link between the station and airport; impacts on properties / land ownerships; and, highways considerations.

The Mayor of London and Mayor of Newham endorsed a **Royal Docks Vision** in 2010 whose aim is to redefine the Royal Docks not as somewhere at the edge of a city but as a place with its own centre of gravity and clear identity of its own. The vision identifies the Royals as an area of major investment and development potential, capable of accommodating new growth in some of London's most innovative economic sectors. It seeks to establish the Royal



Docks as an urban exemplar for a sustainable world city; an outstanding place to live, work and stay. In March 2011 the Royal Docks was designated an Enterprise Zone, meaning that businesses will pay reduced business rates and secure other regulatory breaks over a five year period.

London City Airport has already helped to underpin inward investment as London has grown eastwards. Located close to the City of London and Canary Wharf it is focussed on the needs of the business community. Its evolution is expected to complement investment in East London and, in particular, the Royal Docks Enterprise Zone where the momentum of investor confidence is now growing. This is evidenced by the Asian Business Port (ABP) development commitment at the Royal Albert Dock.

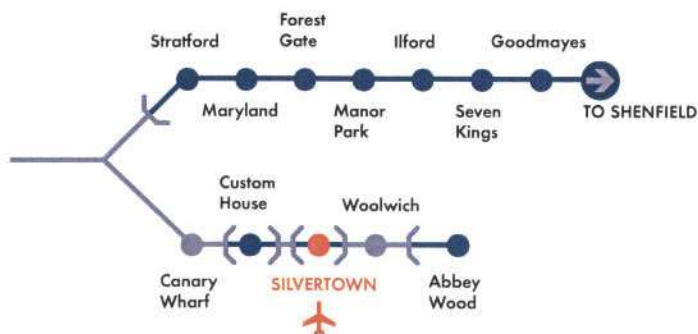
The airport contributes approximately £750 million per year to the UK economy through jobs, passenger spend, the broader supply chain and productivity benefits.

In 2013 two planning applications were submitted to further the **City Airport Development Programme (CADP)** and seeking consent for new airfield infrastructure, extended passenger facilities and a hotel. This development will allow the airport to grow in line with its permitted number of flights and to provide high quality facilities for its predicted 6 million passengers by 2023.

The proposals will provide major improvements to transport infrastructure at London City Airport including a new passenger forecourt and taxi feeder park. The airport sits in one of the most deprived areas in London. Overall, taking all types of employment into account, the CADP proposals would generate an increase in local employment of approximately 1,500 compared to 2012.

The Airport is estimated to make a £1.5 billion total economic contribution to the UK by 2013.

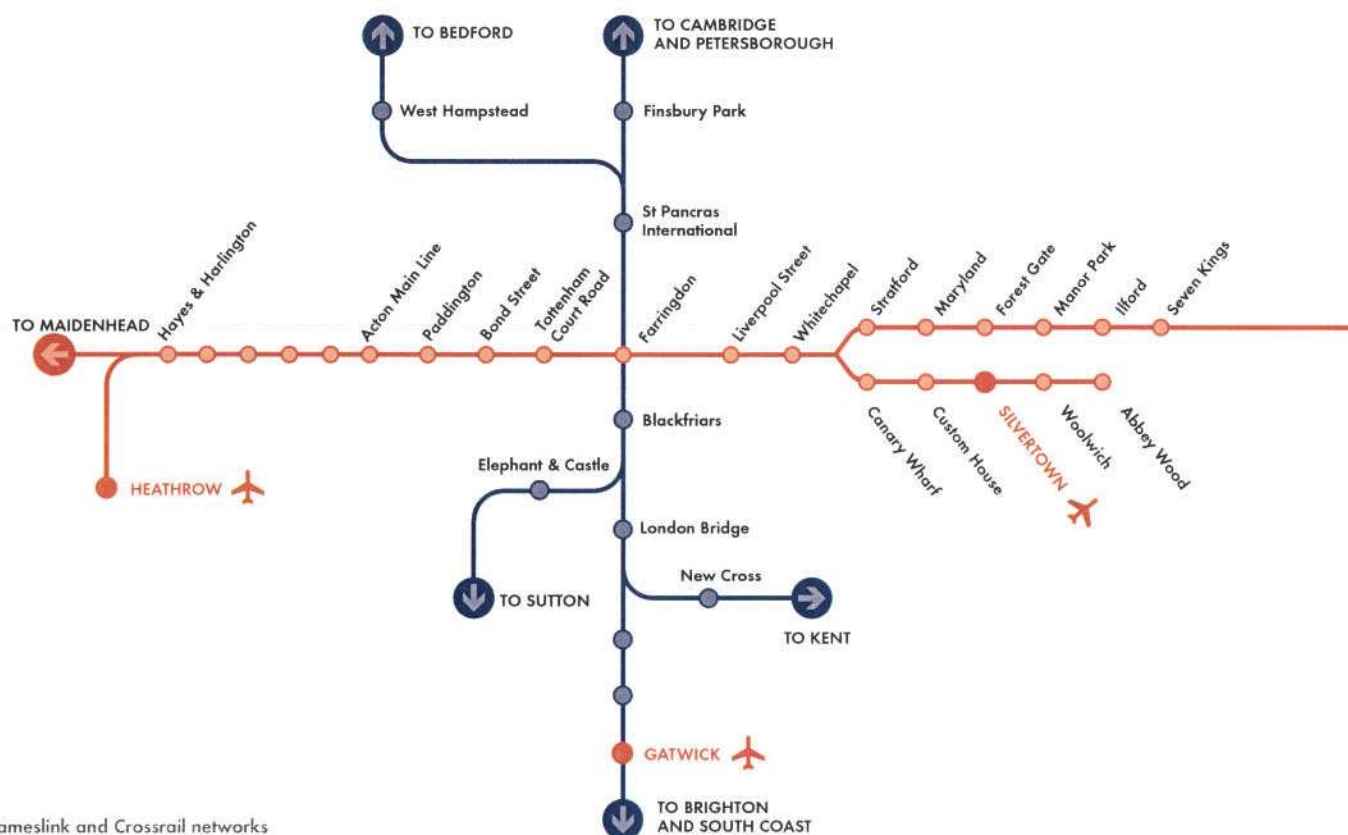
London City Airport CADP proposals, Pascal & Watson.



THE TRANSPORT CASE

London City Airport engaged Atkins to undertake an initial study into the impact of a Crossrail station at Silvertown operationally, on costs and demand. The commission involved using industry-standard demand methodology and approved models. A Silvertown station will, subject to the detail of the design and further detailed demand modelling:

- Transform travel to/from Silvertown and LCY Airport, and become the primary mode of travel from the start of operation;
- Dramatically reduce travel times to/from Silvertown and open up its catchment;
- Lift rail as a mode to around two-thirds of existing users – making LCY Airport the best performing airport in the UK in terms of public transport modal share;
- Generate around £2 million extra in rail revenue from existing airport users and potentially significantly more from users attracted by the new link;
- Likely to enjoy a very positive economic case.



Thameslink and Crossrail networks

Results

Bringing Crossrail to Silvertown in the Royal Docks could be as fundamental as DLR in improving local accessibility. With a Silvertown station, journeys will be direct and approximately 6 minutes to Canary Wharf, 12 minutes to the City and 20 minutes to the West End. There would also be direct access between Heathrow and London City Airport (approximately 44 minutes) as well as good access to Gatwick Airport via the Crossrail/Thameslink interchange at Farringdon under construction.

Estimated direct journey times

Silvertown station	Bond Street	19 minutes
Silvertown station	Farringdon	14 minutes
Silvertown station	Liverpool Street	12 minutes
Silvertown station	Canary Wharf	6 minutes
Silvertown station	Heathrow CTA	44 minutes

With Silvertown station constructed, Crossrail would become by far the single most important link to/from London City Airport and the local community. As a result a significant majority of LCY Airport travellers will chose to travel by rail and bus/coach (Crossrail, DLR, and local buses) rather than use taxi or car – in particular longer distance and new travellers will switch. And, in addition, local use of public transport will increase significantly – particularly for journeys beyond Docklands.

The initial results suggest that passengers would value such a link highly. However, this value is very dependent on the quality of the link to London City Airport and to the local community.

There are no significant operational barriers to a new station stop at Silvertown, although it will add around 2.5 minutes journey time to Crossrail passengers travelling to/from/via Woolwich and Abbey Wood. Silvertown is on one of the (relatively) least busy sections of Crossrail. The number of passengers lost as a result of the extra 2.5 minutes in journey time will be less than the number of extra passengers secured by having a local station on the south side of the Royal Docks and by the connection to London City Airport – even when a forecast fall in the number of DLR passengers from passengers switching is taken into account – although that fall will beneficially also reduce crowding on DLR on the Beckton and Woolwich branches.



Having an extra station will generate increased revenue for Crossrail and for TfL. Even with the impact on DLR and buses included the resulting revenue surplus will be significant – although it is unlikely to be sufficient to pay for the construction of the station. The revenue surplus is however expected to be sufficient to broadly cover all or most of the operational costs (including Crossrail costs), subject to demand, timescales and to the approach taken to the maintenance of the station.

Provision for the construction of a new station is not included within Crossrail's current budget and Crossrail can be expected to resist funding something outside scope at the time their budget was agreed. However, as a first step, the business case needs to be completed to understand what level of funding support might be required, the scale of economic benefit and the likely beneficiaries.

The net impact after abstracted revenue (that is the taking into account where passengers switch routes) is accounted for is shown below:

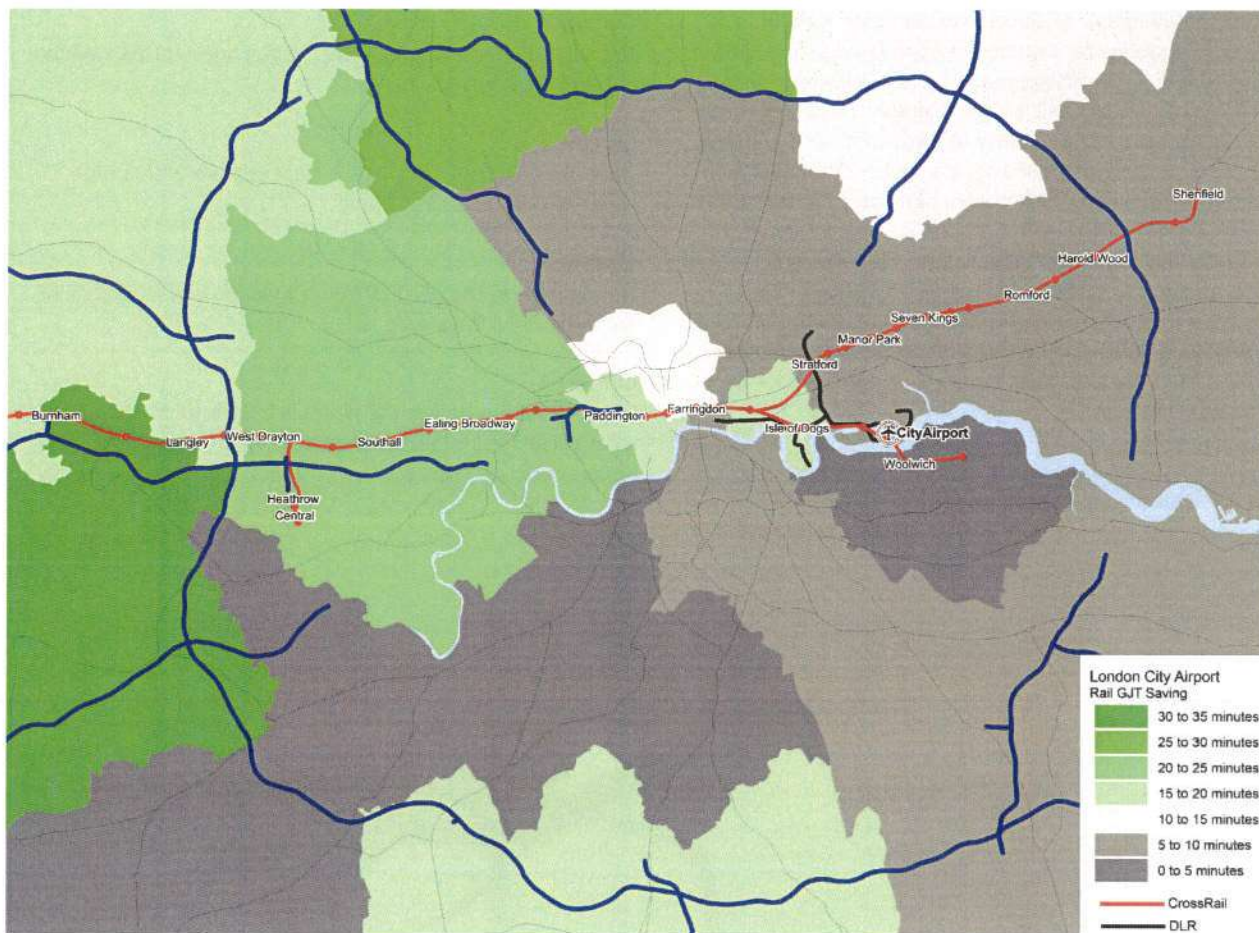
Estimated revenue growth (shown in £1,000s)	2019	2021	2023
Airport users: Travelcard	1,143	1,294	1,379
Airport users: Other rail	370	419	446
Non airport users: Silvertown	2,046	2,132	2,257
Lost revenue from extra journey time	-1,777	-1,886	-2,050
Net impact	1,782	1,957	2,033

The plan opposite illustrates the significant impact on journey times to / from London City Airport that a new Crossrail station would deliver. The journey time savings are expected to be greater post 2018 when the £6 billion Thameslink Upgrade Programme is completed and connected at Farringdon to Crossrail - but these improvements are not modelled as the Thameslink upgrade train service details are still being finalised.

Programme

Providing the new station cannot be allowed to impact on the Crossrail construction programme. For this reason the potential station will not be complete until after Crossrail comes into operation. However it should be possible to make active or passive provision for the new station with a view to reducing future build costs and the station construction programme before Crossrail is itself completed and without impacting on the Crossrail construction programme.

The scale of this early provision will have a significant impact on the final cost - in particular whether construction work can be undertaken before the start of Crossrail train operations that reduces the need for engineering blockades at a later date.



Impact of Silvertown station on journey times if built in 2014

GJT = generalised journey time

THE STATION LOCATION AND AIRPORT LINK

There are a number of considerations in identifying possible locations for a station close to London City Airport. These include identifying space to accommodate station platforms and ticket hall; platform length; proximity to the airport DLR station; proximity to the airport terminal; the environment between the station and airport; impacts on properties/land ownerships; and, highways considerations.

The adjacent plan shows the location of the former Silvertown railway station on the North London Line and where the slope down to the portal of the tunnel under the Royal Docks begins. A length of 200m is also indicated on the plan, this is the length required for the Crossrail platforms.

A number of options have been developed from the consideration of requirements, constraints and opportunities. Moving from west to east these are listed below and detailed in the following section.

Option 1

New station to the south of the railway lines with a walking link to LCY Airport.

Option 2

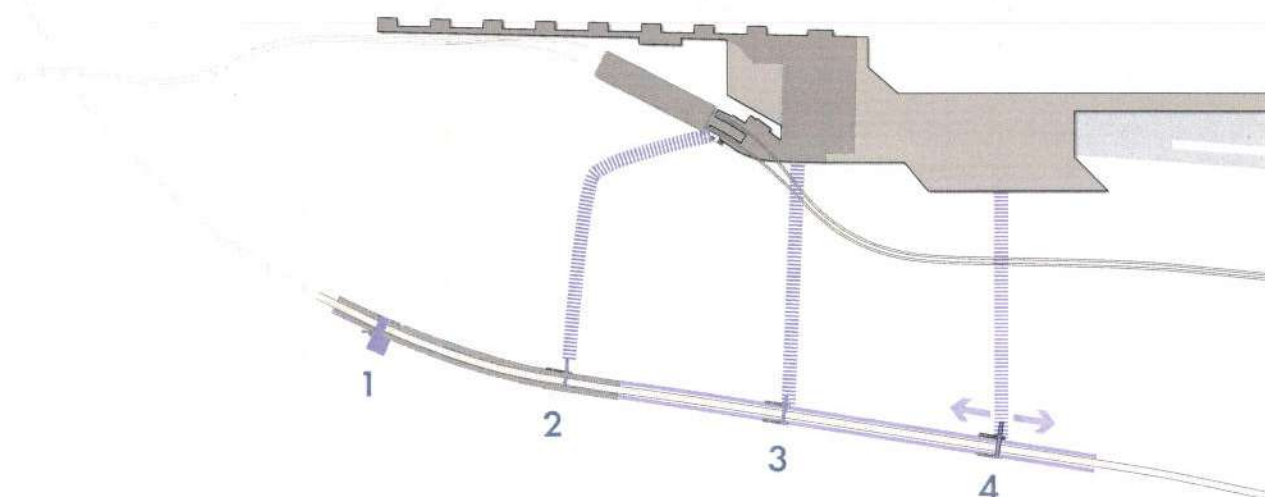
New station to the north of the railway lines with a high level walkway to LCY Airport.

Option 3

New station to the north of the railway lines with high level walkway to LCY Airport.

Option 4

Potential for new station to be built further to the east and most likely north of the railway lines with design principles underpinned by option 3.



Station options - indicative locations

Option 1 would see a new station built on the railway land to the south of the Crossrail tracks. A footbridge with elevators would provide access to the station from the airport and the existing community to the north of the railway tracks. This would be in the location of the existing footbridge and could be wide enough to contain the ticketing facilities. The width of Albert Road would have to be narrowed in part to allow for sufficient platform width adjacent to the stairs and elevator to the footbridge, but would remain sufficiently wide to allow all standard vehicles to pass each other.

The distance between the new station building and the existing DLR station would be approximately 400m. This represents an approximate 5 minute walk at average pace. Public realm improvements would be provided.

Options 2 and 3 would locate the station closer to London City Airport DLR station and terminal. It could be within 300m and take under 4 minutes to walk. There is also the possibility of providing a physical connection to link the Crossrail Station to London City Airport more directly.

It is likely that this would be a high level walkway rather than a tunnel for cost and feasibility reasons. Such a walkway could connect to the DLR station adjacent to the base of the existing escalators to the platforms. This could provide opportunity for paid side transfer between Crossrail and the DLR as well as having Crossrail passengers arrive at the threshold of the airport terminal. Alternatively the link could terminate at ground level under the DLR viaduct opposite the existing terminal entrance.

Option 4 illustrates a Crossrail station shifted further eastwards to provide a more direct connection to the extended terminal (CADP proposal). However, this would increase the distance between the Crossrail and the DLR stations, reducing the potential for them to be perceived as a single interchange.

Option 1 could be located on existing railway land but options 2, 3 and 4 would be dependent on securing land from and/or development agreements with various landowners to build the station and the link to the airport.

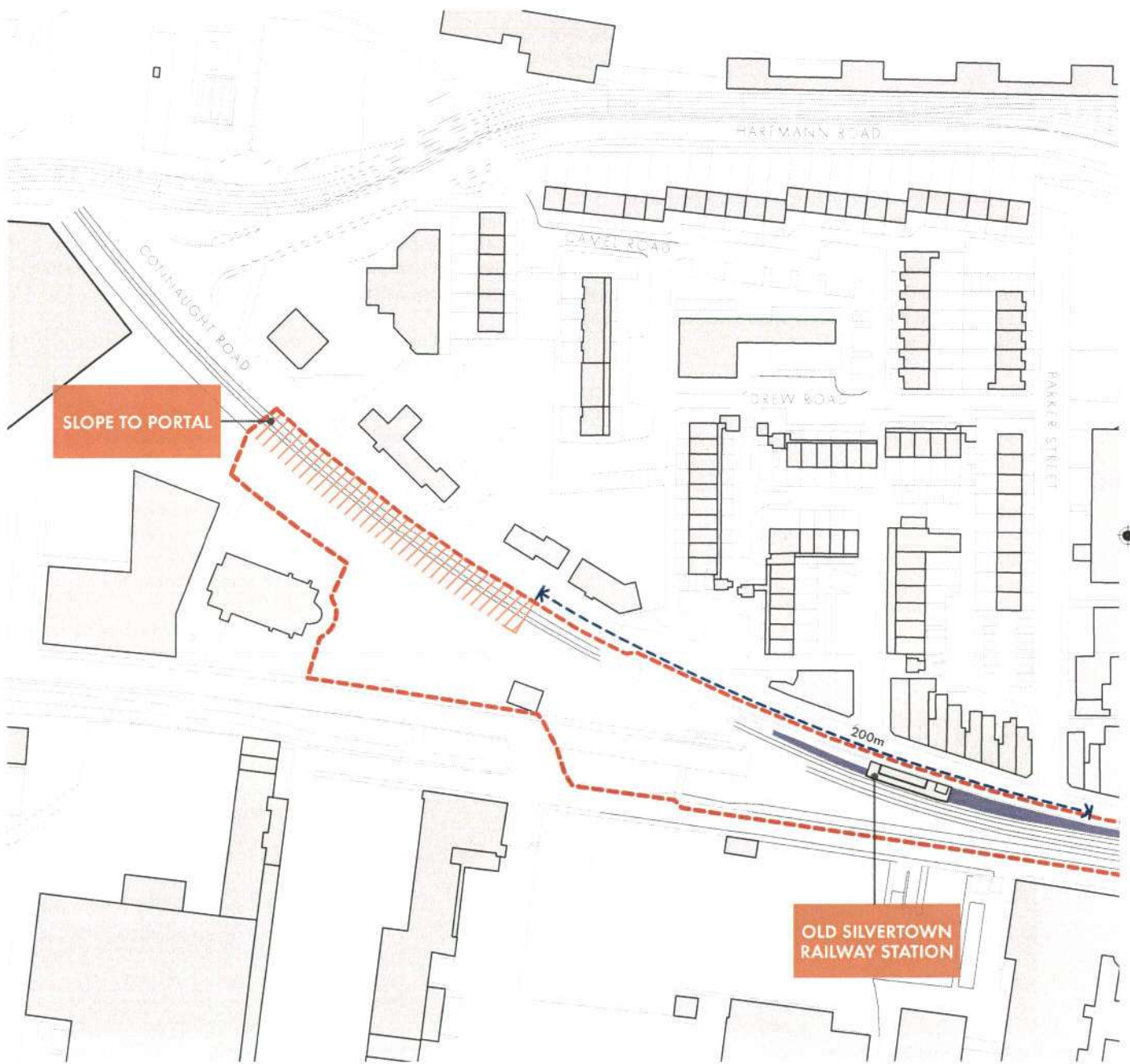
The cost of a new station and its associated infrastructure is estimated to be between £35 million and £65 million.

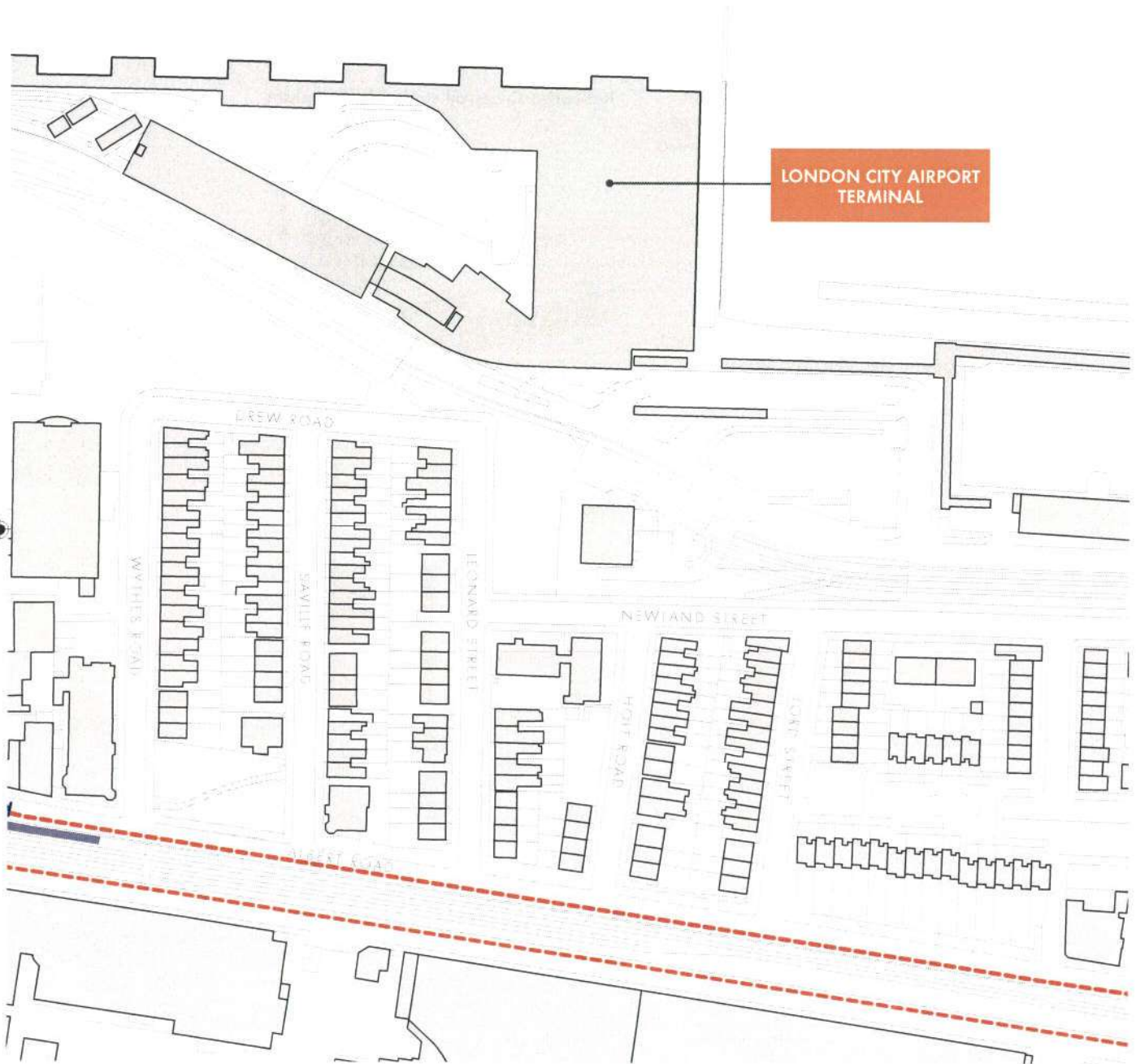


London City Airport DLR station



View down Drew Road towards DLR station





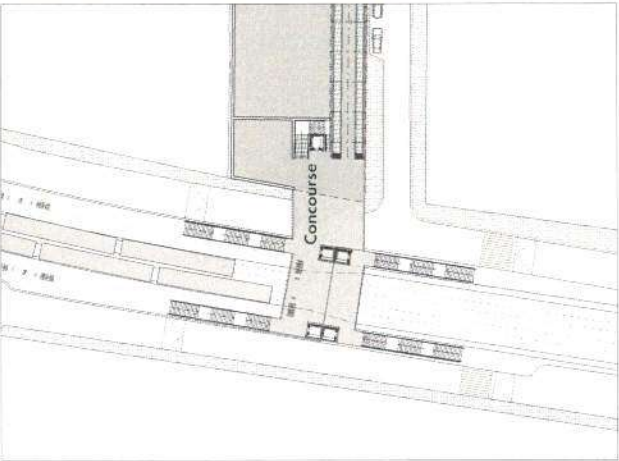
LONDON CITY AIRPORT
TERMINAL

The plan diagrams on this page illustrate how a station could be configured with the existing track alignment and road layout. Ground level and upper level layouts are shown to indicate access to the station and platforms.

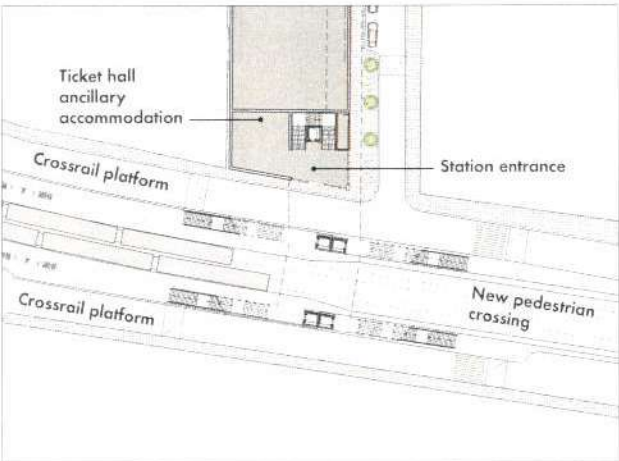
Indicative plans also show how a link from the Crossrail station connects to the London City Airport DLR station, again ground level and upper level layouts are shown to indicate access and circulation.

The elevation drawing indicates a hypothetical link at high level to connect the Crossrail station with London City Airport DLR station.

Indicative Crossrail station layout plans

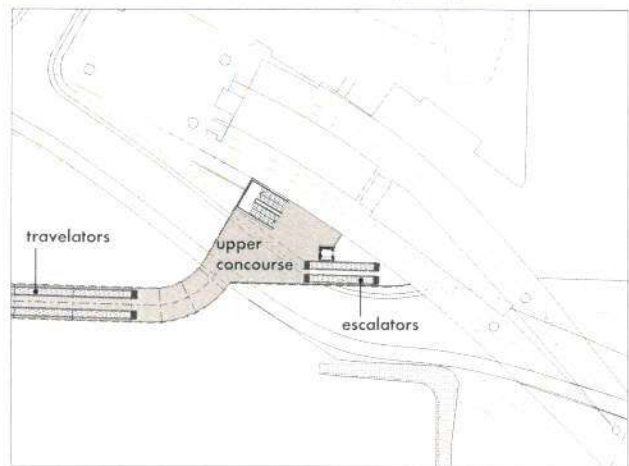


Upper level

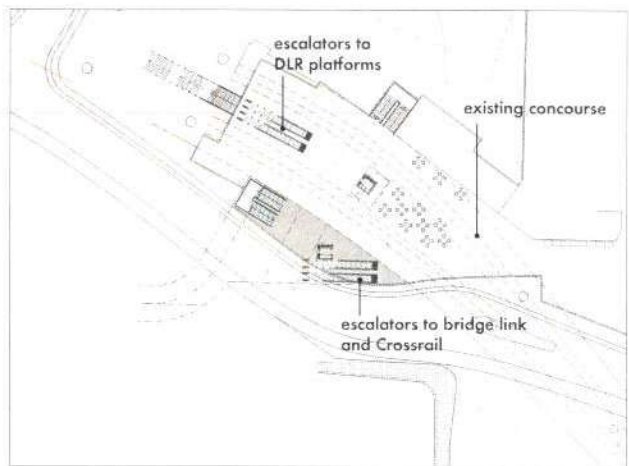


Ground level

Indicative connection to London City Airport DLR station



Upper level

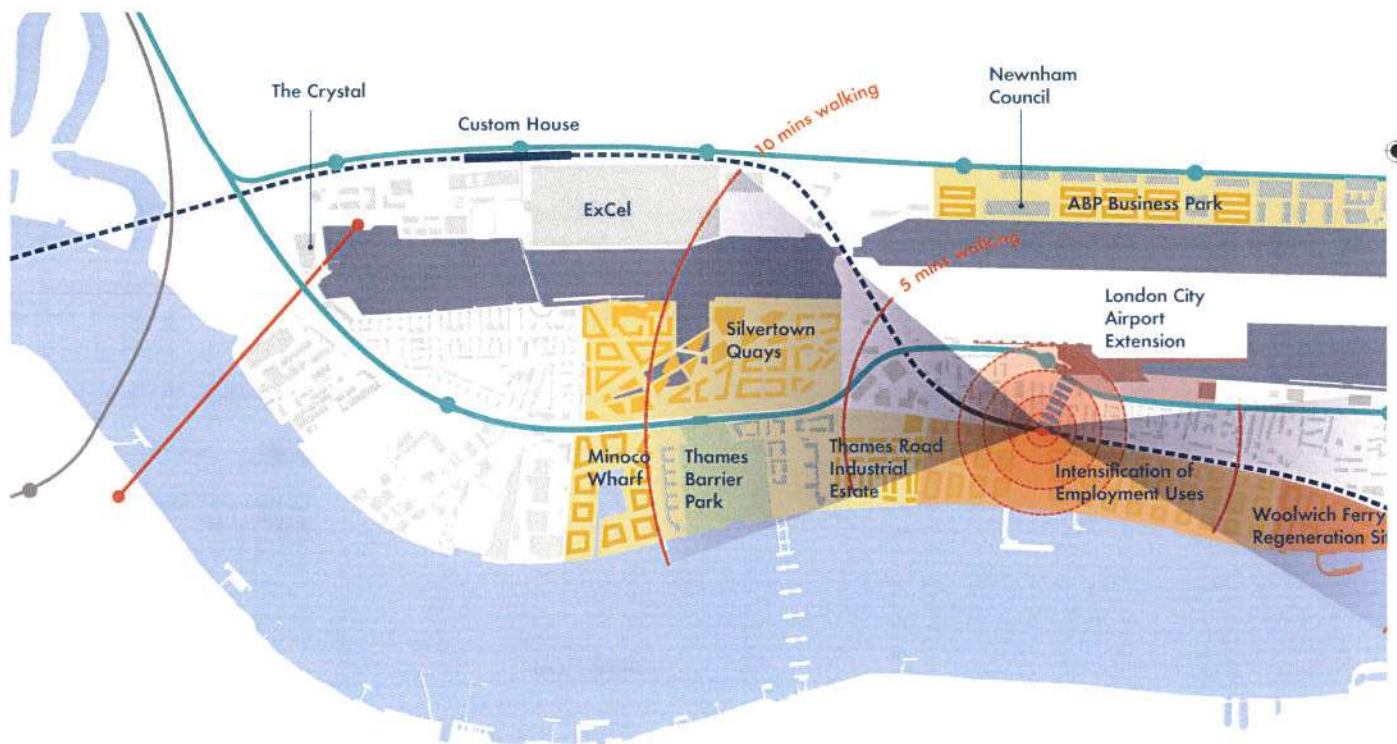


Ground level

WIDER BENEFITS

It is recognised within the Royal Docks Vision that the arrival of Crossrail will transform accessibility, slashing journey times from Heathrow Airport, the world's busiest international airport, as well as the global financial centres of Canary Wharf and the City of London.

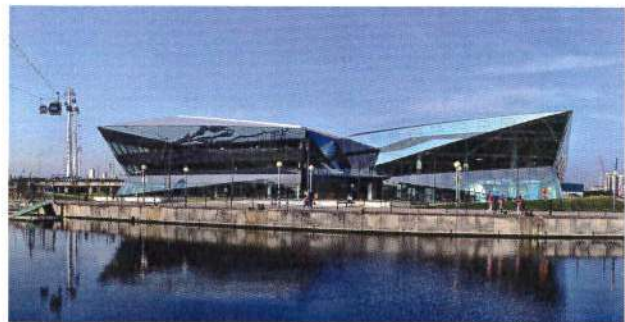
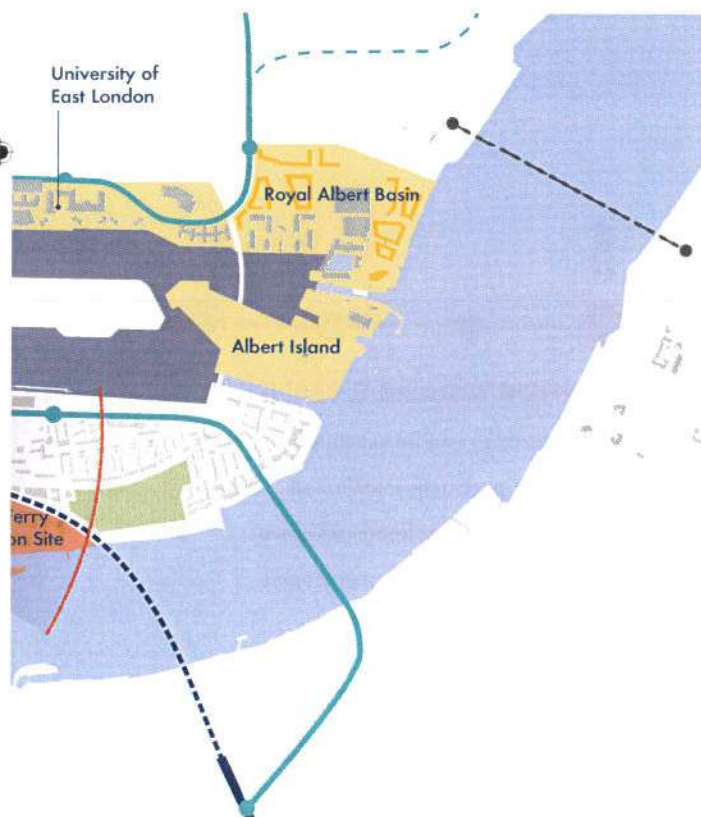
This improved accessibility will be focussed on Custom House and the development of a new Crossrail station and interchange will act as a catalyst for the regeneration of the Custom House area. Newham Council's adopted Canning Town and Custom House Supplementary Planning Document (SPD) sets out a masterplan and regeneration vision for the area, as a public transport interchange, community service centre, employment area and retail centre.



Indicative plan showing the scale for potential intensification of employment uses along the river given the catalyst of a Crossrail station in Silvertown

However the accessibility and regeneration benefits to the south of the docks will be limited. We believe that a Crossrail station at Silvertown would be the next big move in the Royal Docks unfolding vision and regeneration strategy. It would be the key to unlocking the full potential of the major residential and mixed-use sites in the area and it would also underpin the future potential and employment intensification of the river side industrial sites as part of an airport and logistics hub.

A Silvertown Crossrail Station has the potential to resolve and indeed turnaround the significant local impact that the Crossrail project has on the local community. It would bring benefits by bridging the severance caused and providing an attractive and necessary connection across the railway. It also presents a placemaking opportunity to transform what is a deprived and unattractive area into a new piece of city which would be well connected and plugged into existing transport infrastructure. Related and/or over station development could accommodate a range of uses that would provide significant local regeneration and employment benefits for local communities as well as much needed services and amenities.



The Crystal

WHAT HAPPENS NEXT?

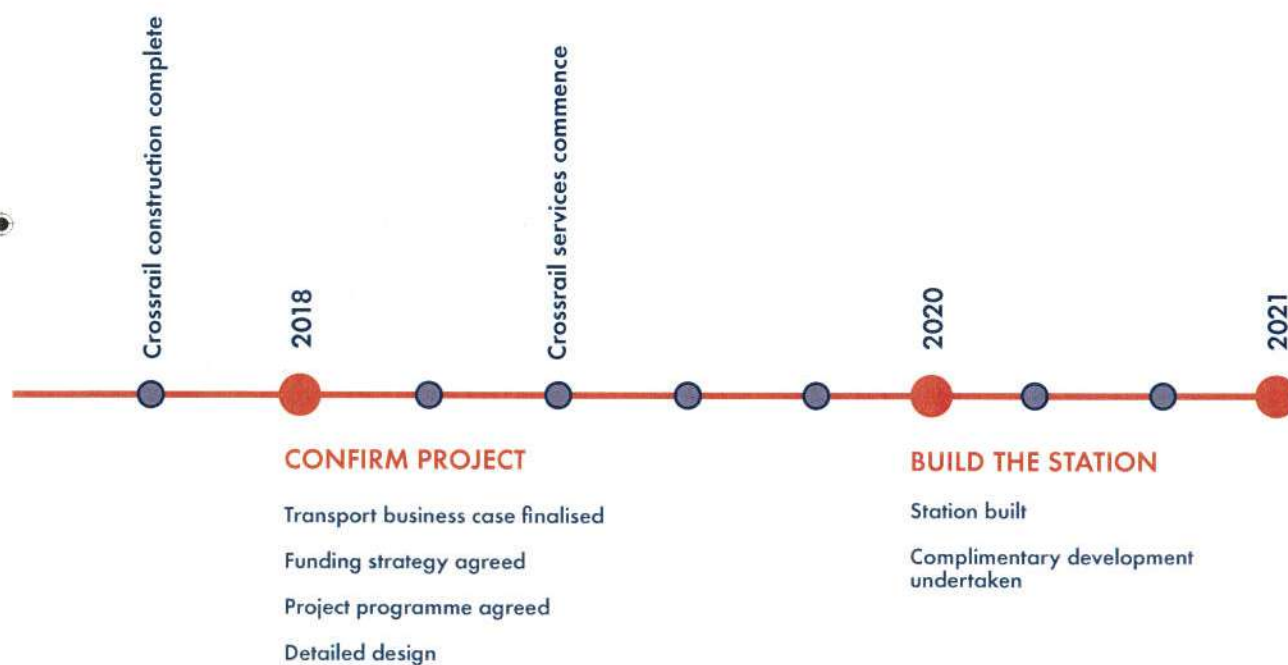
The broad feasibility of providing Silvertown Crossrail station is clear. A Crossrail station at London City Airport would establish a major transport interchange in the Royal Docks – airport, rail, DLR, bus, taxi - providing hugely improved sustainable access. It would connect London's business airport with Heathrow bringing improved strategic international access and it would bring journey time improvements to Canary Wharf and The City, both of which would be dramatic with clear knock on benefits to London's economy.

We believe that there is a strong basis to take the project idea forward, to develop and communicate the vision and win support for it. Ultimately significant technical work will be required to confirm the feasibility of providing a Crossrail station at London City Airport, to allow a transport appraisal to be undertaken and to support application for necessary approvals.



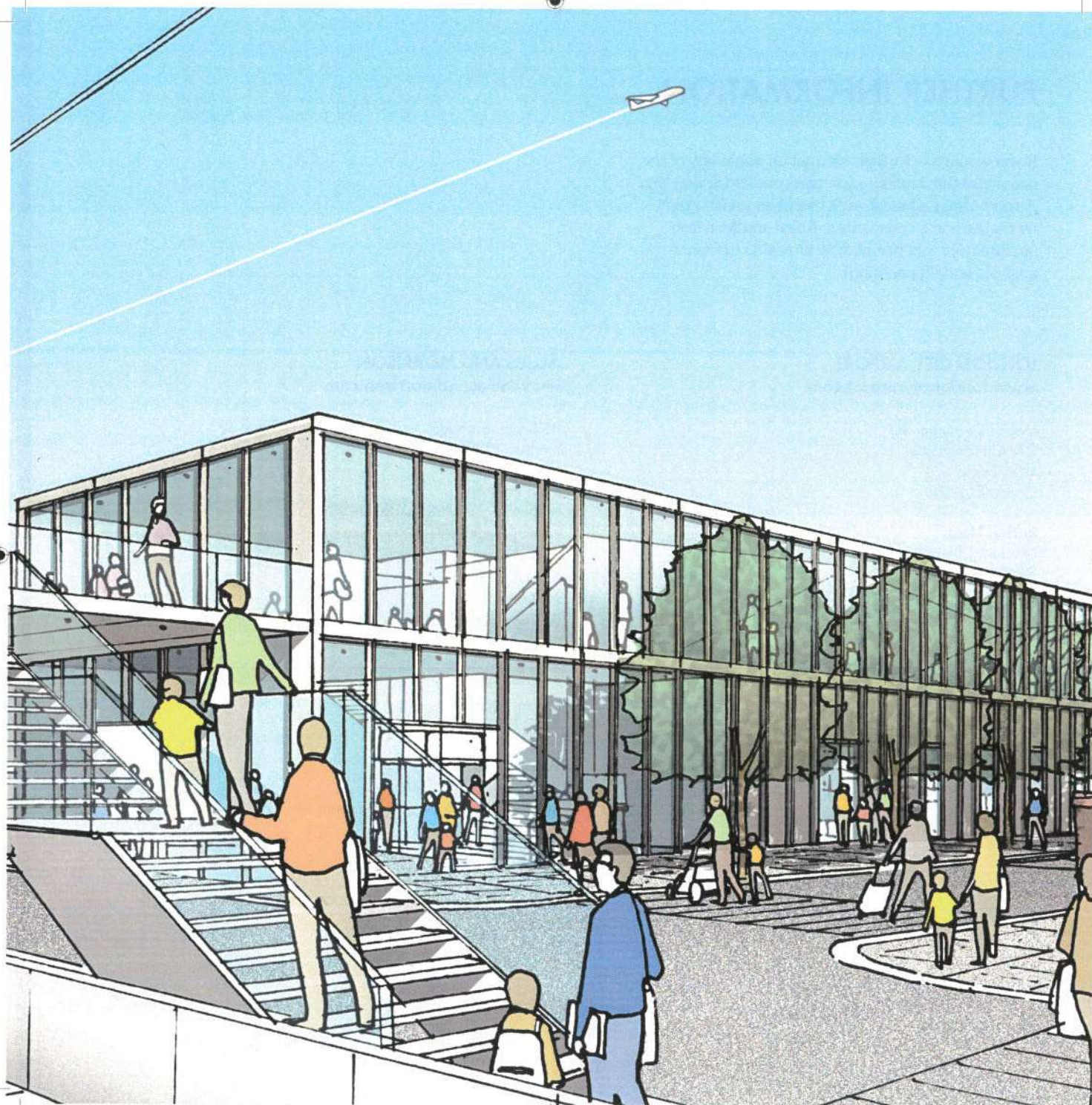
Because a Crossrail station in this location would benefit more than London City Airport we want to secure partnership support and then to undertake the technical feasibility and business case development work. As this will take some time the project could not be developed sufficiently quickly to enable the delivery of Silvertown station within the Crossrail programme.

However it may be possible to future proof the delivery of a station in the detailed design and rail line construction. We want to work with Crossrail in the short term so that a future station can be factored in prior to currently proposed construction.





View showing indicative station design



FURTHER INFORMATION

If you would like further information about any of the content of this brochure you can contact London City Airport. The technical work has been undertaken by the Airport's consultants, Allies and Morrison (architecture and planning) and Atkins (transport analysis and engineering).

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email: Warwick.Lowe@atkinsglobal.com

Allies and Morrison
ATKINS

Appendix 3

**Correspondence from London Borough of Newham to London City Airport confirming
in principle support for Crossrail Station at Silvertown (dated 05 February 2015)**

REF: MAY 24769
Date: 5th February 2015

Mr Declan Collier
Chief Executive
London City Airport
Hartmann Road
London
E16 2PX

Dear Mr Collier,

I am writing to you following the recent meeting between London Borough of Newham and London City Airport regarding the proposed Crossrail station at City Airport. We can confirm our support in principle for this additional stop.

We welcome Crossrail's position that such a stop could be feasible as it does not interfere with the completion of Crossrail by 2018; does not increase journey times; and that funding can be led by the private sector.

We support additional connectivity to the area which will help realise our long term vision for its regeneration. Importantly, this additional connectivity will benefit local residents who have experienced significant disruption caused by large-scale construction in the area related to Crossrail.

We also welcome London City Airport's commitment to work with local people on this project. Given that there will need to be a connection between the new station and airport, we will want to see evidence of broad local support for the plans.

Further to your suggestion of establishing a working group, we suggest the membership from the London Borough of Newham to be Councillor Ken Clark, Cabinet Member for Building Communities and Public Affairs, and Kieran Read, Head of Public Policy & Research.

I look forward to close dialogue on this issue as the proposal develops.

Yours sincerely,



Sir Robin Wales
Mayor of Newham

London Borough of Newham
Newham Dockside
1000 Dockside Road
London E16 2QU

T +44 (0) 20 8430 2000
W www.newham.gov.uk

Appendix 4

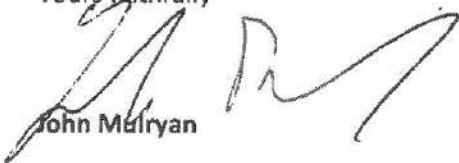
Letters of support from local landowners Ballymore and Silvertown Partnership

ballymore.

11th April 2016

The Ballymore Group are full supportive of a Silvertown Crossrail Station serving the Airport and the residents of the Royal Docks/North Woolwich. A new Crossrail Station would bring significant benefits to the area by improving connectivity and unlocking the full development potential of major residential and mixed use sites across the Royal Docks. It is important that local policy is supportive of a new Station in order for these benefits to be realised in the future.

Yours faithfully

A handwritten signature in black ink, appearing to read 'John Mulryan', is written over the typed name.

John Mulryan

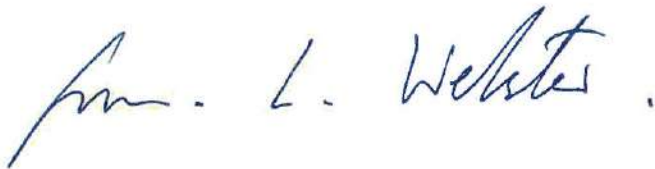
Managing Director Ballymore UK

WN SILVERTOWN SIL'

11th April 2016

Representations on the examination of the Newham Sites and Policies Plan

The Silvertown Partnership are fully supportive of a Silvertown Crossrail Station serving the Airport and residents of the Royal Docks/North Woolwich area. A new Crossrail Station would bring significant benefits by improving connectivity and enhancing the potential of the major residential and mixed-use sites across the Royal Docks, of which Silvertown is the largest. It is important that local policy is supportive of a new Station in order for these benefits to be optimised in the future.



Simon Webster
The Silvertown Partnership

