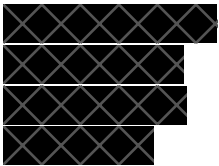


REF: R00596/IN/EH/MR

BY EMAIL ONLY - bankssolutionsuk@gmail.com

Charlotte Glancy
Programme Officer
C/O Banks Solutions



6 November 2025

Dear Charlotte

**EXAMINATION OF THE NEWHAM LOCAL PLAN 2022-2040
HEARING STATEMENT: MATTER 3 – SPATIAL STRATEGY
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of the applicant, Unite Group Plc (Unite), to submit a Hearing Statement in response to the matters, issues and questions raised by the Inspector (William Fieldhouse) concerning the Examination of the Newham Local Plan, which will set out the spatial strategy for Newham to 2038.

The submission of this Statement follows representations made on behalf of Unite to the previous stages of the draft Local Plan's preparation, as follows:

- Representations to the Newham Local Plan Refresh Issues and Options Consultation – December 2021
- Representations to the Newham Draft Local Plan Regulation 18 Consultation – February 2023.
- Representations to the Newham Draft Local Regulation 19 Consultation – September 2024.

Introduction

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 68,000 students across 153 properties in 23 leading university towns and cities. In London, Unite provide homes to circa 12,567 students across 32 properties with further schemes under consideration at full application and pre-application stages.

This includes existing properties in Newham including Angel Lane and Stratford One, as well as further schemes under construction including Jubilee House and Meridian Square.

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Following on from the representations submitted on behalf of Unite to the New Local Plan Regulation 19 Stage Consultation, dated 16th September 2024 and hereafter referred to as 'Reg. 19 reps', this Statement focuses on Matter 3 and specifically the Tall Building Zones issue which relates to Policy D4 (Tall Buildings).

Policy D4 (Tall Buildings)

The draft wording of Policy D4 (Tall buildings) is as follows:

1. *"Tall buildings in Newham are defined as those at or over 21m, measured from the ground to the top of the highest storey of the building (excluding parapets, roof plants, equipment or other elements).*
2. *Tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas designated as 'Tall Building Zones'. The height of tall buildings in any 'Tall Building Zone' should be proportionate to their role within the local and wider context and should not exceed the respective limits set in Table 1 below."*

Table 1 then goes on to detail the Tall Building Zones, the neighbourhood they are located within, any site allocations within the zone, their height range maximum and any further guidance.

The Inspector's matters, issues and questions document, explains that:

"Policy BNF1 part 2(b) supports tall buildings (over 21 metres) in the borough's Tall Building Zones. Policy D4 states that tall buildings will only be acceptable in the 22 designated Tall Building Zones which are listed in Table 1, indicated on a map in the Plan, and designated on the policies map. Table 1 specifies a "height range maximum" for each Zone, expressed in terms of metres (and approximate number of storeys). These are reflected in the policies for the neighbourhoods and site allocations in part 2 of the Plan.

The Newham Characterisation Study 2024, and in particular the Tall Buildings Annex 2024 seem to provide the main evidence."

Inspector's Question 3.2

The document then sets out the Inspector's question in relation to Policy D4 at Q3.2:

Q3.2 Are the Tall Building Zones listed in policy D4 Table 1 and designated on the policies map, and the "height range maximum" for each, justified and will they be effective in helping to meet the identified needs for housing and other development in an appropriate way that is consistent with national policy and the London Plan?

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The Reg. 19 reps submitted considered whether this policy is justifiable. Newham have since published their responses to the comments made at Regulation 19 consultation. The responses relating to this policy are included in their 'Newham Local Plan Refresh Regulation 19 Consultation Report: Design Comments (PDF)' (Examination Library ref. SD021).

Newham have also published a Tall Buildings Topic Paper dated July 2025 in response to the representations on policy D4 (Tall Buildings) (Examination Library ref. TP001).

Firstly, within their Design Comments, in response to the comments made on behalf of Unite, Newham state:

"A change to this policy approach has not been made. We did not consider this change to be necessary as the Council considers the policy to be in conformity with the London Plan. London Plan Policy D9 requires boroughs to identify locations where tall buildings may be an appropriate form of development and to define the maximum height that could be acceptable in these locations"

Unite would firstly like to reiterate their support the consideration of areas suitable for tall buildings and do not dispute that the consideration of such zones aligns with the London Plan. In particular, Unite support the designation of Stratford Central as a Tall Building Zone, and the acknowledgement that landmark buildings would be appropriate adjacent to the station.

Nevertheless, Unite query the inclusion of prescriptive heights based on the following factors:

- Where prescriptive storey heights are suggested, Unite argue that storey heights can vary substantially for various uses depending on floor to ceiling heights.
- A blanket prevailing height will result in all development being the same height or very similar.
- The assessment of a tall building should be based on contextual analysis.
- Existing sites have varying heights already established by planning permission that have therefore previously been deemed acceptable and should be accounted for when suggesting appropriate heights.

Newham's Design Comments argue that:

"Supporting text of [London Plan] Policy D9 part B (2) clearly states "in these locations, determine the maximum height that could be acceptable".

However, ROK would argue that the use of 'could be acceptable' suggests an element of flexibility and not a definitive cut off point. Allowing for flexibility is further supported by the use of 'appropriate' within the wording of part B2 of Policy D9:

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“Any such locations and appropriate tall building heights should be identified on maps in Development Plans.”

As such, the current wording is in conflict with the degree of flexibility built into London Plan Policy D9. Unite therefore argue that an element of flexibility should be built into this Policy so that it can allow taller buildings outside designated areas as well as for tall buildings outside of the recommended height ranges where appropriate, taking a design led approach as encouraged by draft Policy BFN1 (Spatial strategy) and London Plan Policy D3 (Optimising site capacity through the design-led approach).

Notably, the Tall Building Topic paper highlights that the GLA also made this recommendation within their representations to the Regulation 19 Consultation, asking for ‘maximum’ building heights to be amended to ‘appropriate’ as *“this is considered to be practical in terms of enabling boroughs to focus the tallest buildings in a particular more central part of a tall building zone and perhaps seeking lower building heights towards the edges of that zone”*. Whilst Newham argue that they have already taken this into consideration by proposing varying heights within each tall buildings zone, Unite argue that the ‘maximum’ of this range remains restrictive.

Indeed, a more flexible approach would allow for the establishment of tall student accommodation buildings in locations that are closer to educational institutions. This is essential for providing convenient access to campuses, reducing commuting times, and enhancing the overall student experience. Furthermore, allowing tall building development outside designated areas enables better integration of student housing with on-campus facilities, academic buildings, and recreational spaces. This promotes a seamless connection between living and learning environments.

Wider issues and the criteria set out in Part C of the London Plan Policy D9 including visual impact, functional impact, environmental impact and cumulative impact are rigorously assessed within any planning application for a tall building to ensure its suitability for its location. Consequently, fixed limits on building heights should not be pre-set in policy as their suitability will be considered on a site-by-site basis through supporting technical reports as well as attendance at Design Review Panels. Within the comments on the draft London Plan Tall Buildings Policy in the Report of the Examination in Public of the London Plan 2019 dated 8 October 2019, the Inspector highlights the level of flexibility built into the London Plan’s criteria, *“Overall, the criteria are justified and provide the necessary level of flexibility for borough adaptation to fit local circumstances.”*

For example, Unite’s scheme at Land adjacent to Meridian Steps, Great Eastern Road, E15 1BB (ref. 22/00178/FUL_LLDC) measures +135.775m AOD (41 storeys) in height. As confirmed within the scheme’s committee report, the height in this location was demonstrated to be suitable and appropriate to the local context through detailed discussions with LLDC’s Quality Review Panel as well as the technical supporting information. It was therefore decided that the development complied with Policy D9.

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In accordance with the draft Newham Local Plan, this development would be located within TBZ19: Stratford Central. The height limits for this zone are described as follows:

- *“Prevailing heights should be between 21m and 32m (ca. 7-10 storeys) except along the sensitive edge of the Broadway where prevailing heights should be between 9m and 21m (ca. 3-7 storeys).*
- *Opportunity to include tall building elements of up to 60m (ca. 20 storeys) in most of the Tall Building Zone.*
- *To mark Stratford Station, Stratford International station, Westfield Avenue and the urban edge of Queen Elizabeth Olympic Park at International Quarter and Stratford waterfront, a limited number of tall building elements of up to 100m (ca. 33 storeys) could be provided.”*

Whilst TBZ19 has been identified as the area of maximum height in the Borough and the scheme would be located in the greatest maximum height range of the zone, the scheme would still significantly exceed the limit of 100m (even excluding parapets, roof plants, equipment or other elements). Despite this scheme successfully demonstrating the acceptability of a height greater than 100m in this zone when tested against the relevant London Plan criteria, this would not be possible under the draft Newham Local Plan policy which provides no flexibility with regards to the maximum heights. As such opportunities to create such developments (in this case a landmark building with significant public benefits and a new station entrance) will be missed and concerns regarding inconsistency with existing permissions are raised.

Newham's response to the Reg. 19 reps goes on to state:

“Policy D3 in the London Plan requires a design-led approach to optimise the site capacity based on an evaluation of “the site’s attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.” Furthermore, supporting text of Policy D3, 3.3.1 clearly states “The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.”

In line with London Plan policies D9 and D3, suitable locations and maximum heights for tall buildings have been identified based on an assessment of existing heights, proximity to public transport, impact on open space and heritage assets. Therefore, the spatial strategy and the height parameters for the Tall Building Zones result from an evaluation that already addressed designed approach considerations.”

However the Report of the Examination in Public of the London Plan 2019 notes that a policy of constraint (i.e. without an element of flexibility) would be at odds with the design led approach, *“A policy of constraint, which seeks identification of areas sensitive to tall building development, would be at odds with the design led approach promoted and would not provide the necessary strategic direction promoted*

by that suite of policies.”.

Whilst Unite would agree that optimum does not always mean maximum, a degree of flexibility should be incorporated allowing the assessment of proposals against the criteria in Part C of London Plan Policy D9 to ensure that in scenarios where high density development can be demonstrated as appropriate it can be approved and contributions to housing targets can therefore be maximised.

With particular regard to purpose built student accommodation (PBSA), tall buildings allow for vertical development thus optimizing land use which is essential for the growing student population across London. Indeed, the Newham Characterisation Study 2024 Chapter 8 Vision Neighbourhood Principles (Part 2) (Examination Library ref. EB017) acknowledges that within the Stratford and Maryland neighbourhood there is *“a significant amount of new academic and artistic institutions”*.

This is especially beneficial in densely student populated areas where available land is scarce. Tall buildings allow for efficient land use, accommodating a larger number of students in a relatively small area. This promotes higher population density, creating a dynamic and vibrant student community. Well-designed student accommodation buildings can contribute to the aesthetic appeal of the cityscape, creating a distinctive skyline. This can enhance the overall attractiveness of the educational district. Additionally, student housing demand can vary across different parts of a borough. A flexible approach allows for the development of tall buildings in areas where there is a specific need for student accommodation, addressing local housing demands effectively.

Summary

In summary whilst Unite support the identification of suitable locations for tall buildings based on factors such as existing heights, proximity to public transport, impact on open space and heritage assets, they argue that the use of indicative height parameters would work more effectively as opposed to zones that provide 1) the only ‘acceptable’ locations for tall buildings and 2) ‘limits’ that developments ‘should not exceed’.

Unite reserve the right to further their comments via participation in the Matter 3 (Spatial Strategy) Hearing as part of the Examination in Public on 3 December 2025.

I trust this Statement is in order and look forward to confirmation of safe receipt. If you require further clarification or wish to discuss this further, please do not hesitate to contact either Erlina Hale (erlina.hale@rokplanning.co.uk), Immie North (imogen.north@rokplanning.co.uk) or myself at this office.

Yours Sincerely,

ROK
PLANNING



Matthew Roe
Director
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