



Quod

**Newham Local
Plan
Examination:
Matter 6**

**Hearing
Statement**

IQL Office LP (on behalf of
Stratford Cross)

27 November 2025

Matter 6 Housing Development Management Policies

Introduction

- 1.1 This Hearing Statement is prepared by Quod on behalf of IQL Office LP in relation to Draft Policy H8: Purpose-Built Student Accommodation (PBSA).
- 1.2 IQL Office Ltd is the main landowner at Stratford Cross – a major residential and commercial quarter within the Stratford Metropolitan Centre, with a PTAL of 6b (the highest level) and within London Borough of Newham’s (LBN) Draft Local Plan Allocation N8.SA5 Stratford Town Centre West.
- 1.3 Stratford Cross is located between Westfield Stratford City and East Bank, which includes the University of Arts London (UAL) London College of Fashion (LCF), the BBC, V&A Museum East and Sadlers Wells East. It has been partially built out under the wider 73ha Stratford City Outline Planning Permission (ref: 10/90641/EXTODA), which permits 283,399sqm commercial floorspace for Stratford Cross along with residential, education, leisure, retail floorspace and new open space. Indicatively shown in Figure 1 below.

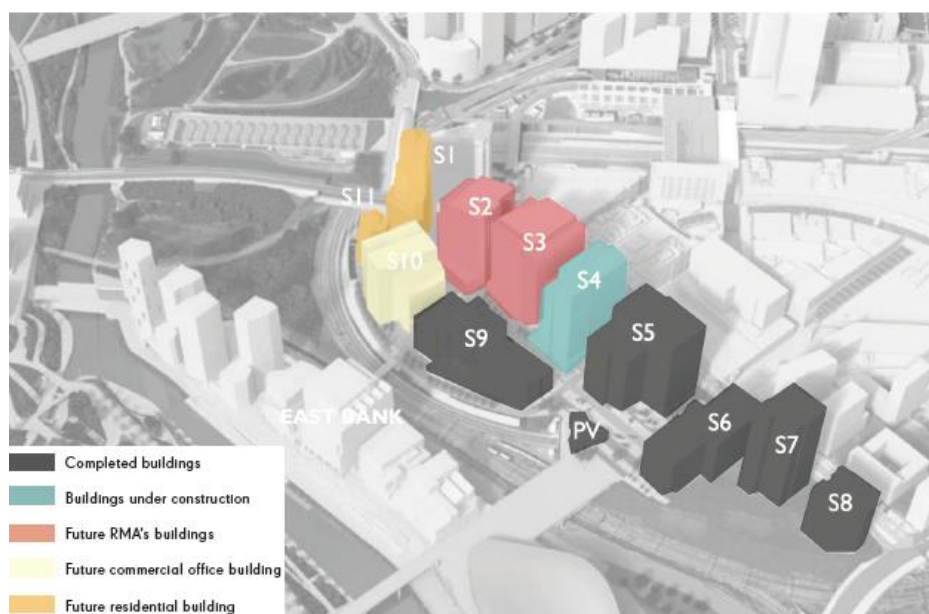


Figure 1: Stratford Cross Context

- 1.4 The character of Stratford has evolved through its regeneration, with further education and housing replacing the reduced demand for large commercial offices. As a result, Stratford has become a hub for universities, with the UAL LCF and University College London (UCL) East campuses built near Stratford Cross on the edge of the Queen Elizabeth Olympic Park (QEOP), as well as Arden University in the Turing Building at Stratford Cross.
- 1.5 Other universities have opened campuses in the area at Here East (Loughborough, Staffordshire and Teesside), as well as the expansion of the University of East London in the east of Stratford.
- 1.6 As city-based universities, many of these university campuses are scattered throughout the urban environment with teaching spaces located within business parks and commercial districts rather than the more expansive self-contained style of traditional campuses.

- 1.7 Master planning is being undertaken with LBN Officers to explore diversifying some of the remaining floorspace into other appropriate town centre uses, a range of potential residential tenures, including PBSA.
- 1.8 IQL Office LP has concerns over the Regulation 22 Local Plan (Submission reference SD005b) added definitions for “adjacent” and “campus” in the Policy H8 implementation table. When taken with the implementation monitoring requirements, Policy H8 Part 1 would place severe restrictions on the ability to provide PBSA close to the university campuses in highly-accessible locations where the London Plan encourages PBSA.
- 1.9 These concerns are in addition to our previous unresolved concerns around the affordable student accommodation requirements inconsistency with the London Plan.
- 1.10 Accordingly, this Statement responds to the relevant points Q6.7 a) and c) of the Inspectors Matters extracted below:

Q6.7 Is policy H8 justified, consistent with the London Plan and will it be effective in helping to meet the identified need for purpose built student accommodation in appropriate locations? In particular:

- a) The requirements in part 1 relating to proposals in the Stratford and Maryland neighbourhood.
- b) The requirements in part 2 relating to proposals elsewhere in the borough.
- c) The requirement in part 3 for at least 60% affordable housing.
- d) The requirements in part 4 relating to nomination agreements.
- e) The requirement in part 5 for the provision of ancillary communal space and sporting facilities.

a) The requirements in part 1 relating to proposals in the Stratford and Maryland neighbourhood

- 1.11 Our concerns principally relate to how the new “adjacent” definition to 300m of a campus read with the restrictions in Part 1 would severely restrict the delivery of PBSA in the most appropriate locations in LBN. The inclusion of the definition is in response to unfounded concerns around over-concentration of PBSA in the Stratford and Maryland neighbourhood and disregards the wider regeneration aims for Stratford, increased student need in the area and availability of appropriate sites.
- 1.12 This approach is inconsistent with the London Plan Policy H15 and supporting guidance in relation to the following matters and considered further below:
 - Encouraging PBSA in well-connected locations as part of mixed-use regeneration schemes;
 - The strategic need for student accommodation; and
 - Over-concentration and considerations to mixed and balanced communities.

Encouraging PBSA in well-connected locations

- 1.13 There are no locational constraints for PBSA set out either in the National Planning Policy Framework (NPPF), with the London Plan Policy H15 Part B considering that:

“Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.”

- 1.14 Further considerations for locations where PBSA should be encouraged is set out in Section 2.2 of the Mayor of London's Purpose-Built Student Accommodation London Plan Guidance (PBSA LPG), including:
- the Central Activities Zone and Inner London Opportunity Areas;
 - Metropolitan and Major town centres; and
 - Areas of Public Transport Accessibility Levels (PTALs) 5 or 6 and Inner London PTAL 4.
- 1.15 Stratford fulfils these criteria, as it is designated Metropolitan Centre, is highly accessible with a PTAL of 6b, as well as forming the centre of the Olympic Legacy Opportunity Area within Inner London where significant regeneration is expected to deliver 39,000 homes.
- 1.16 As mentioned above, the Stratford area is home to numerous university campuses but the limitation of PBSA to within 300m from a linked campus does not take account of the limited availability of sites close to the campuses. For instance, campuses at Here East where the land within 300m in LBN is mostly designated as Metropolitan Open Land. The 300m limitation would therefore mean highly accessible available brownfield sites like Stratford Cross would be restricted from providing PBSA to those campuses, even when there are no suitable opportunities for PBSA in closer proximity.
- 1.17 Many of the Universities have numerous campus buildings both within Stratford and across wider London where students are expected to travel between. The 300m radius restriction fails to reflect this reality and could restrict accessibility for students and freedom to choose accommodation that suits their needs.
- 1.18 The use of a 300m distance is based on the definitions of edge-of-centre used for retail purposes but is arbitrary in relation to reasonable walking catchment areas. As an example, the Here East university campuses are 800m from to Stratford Cross, equating to a 10 minute walk. The Mayor of London's Planning for Walking Toolkit¹ (March 2020) identifies 800m as a walkable catchment from a Tube station, rail station or town centre and supports residential intensification within this catchment. As a result, the location restriction of a maximum 300m radius from PBSA to a campus is also not consistent with guidance of walking catchments in London.
- 1.19 Therefore, the locational restrictions in the draft policy wording are unsound with the London Plan and NPPF and would deem potential available sites unsuitable in areas encouraged in the London Plan, such as Stratford Metropolitan Centre.

Strategic need for student accommodation

- 1.20 The locational restrictions on PBSA in the Stratford and Maryland Neighbourhood do not reflect the strategic nature of student need expressed in London Plan Policy H15 Part 1 and in supporting paragraph 4.15.3, where it explains that:

"The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding"

- 1.21 There has been a substantial growth in university campuses and students studying in the Stratford area as part of the substantial planned regeneration of the area driven by the legacy of the 2012 Olympic and Paralympic Games. This included the opening of the new campuses referenced in the introduction. LBN acknowledge in their Policy H8: Purpose-Built Student Accommodation Topic Paper (2025) ("LBN Topic Paper") (Submission Reference TP003) that

¹ <https://content.tfl.gov.uk/the-planning-for-walking-toolkit.pdf>

there are around 33,350 students currently studying in LBN (paragraph 4.5). However, this does not include students at:

- The new Arden University campus in Stratford Cross;
- The four campuses located at Here East (UCL, Loughborough, Staffordshire and Teesside Universities) located in the London Borough of Hackney but on the edge of the QEOP and LBN boundary;
- The planned expansion of the University of East London and additional 10,000 students during the plan period.² and
- The planned expansion of the UCL East campus within the Queen Elizabeth Olympic Park.

- 1.22 These universities and further universities continuing to move to the area, will all increase the demand for student bedspaces in the area, which will not be able to be met with locational restrictions in the draft policy applied to the Metropolitan Centre.
- 1.23 The Inspector at a recent dismissed appeal for 700 PBSA beds at 302-312 High Street, Stratford (ref: APP/M9584/W/24/3350592) disagreed that there is an oversupply of PBSA against demand and gave limited weight to imbalances in housing tenure compared to the overall student bedspace shortfall (paragraph 56).
- 1.24 A revised application at the same site received a resolution to grant from the LBN Strategic Development Committee on 11th November 2025 for 692 PBSA bedspaces (ref: 25/01687/FUL). Paragraph 76 of the associated Committee Report noted that whilst the supply of PBSA in the immediate locality is increasing, the proposed development is considered acceptable given its potential to alleviate pressure on the wider housing market by providing dedicated student accommodation.
- 1.25 Consequently, there is significant student bedspace demand in the Stratford area, which is expected to grow during the draft Local Plan period in response to the expansion of campuses in the area. However, this will not be able to be met if the proposed locational restrictions in the draft Policy H8 wording are applied.

[Over-concentration and considerations to mixed and balanced communities](#)

- 1.26 IQL Office LP disagree that there is an over-concentration of PBSA in the Stratford and Maryland neighbourhood and therefore there is no need for the proposed locational restrictions and monitoring requirements in the Regulation 22 Local Plan (page 258).
- 1.27 LBN assert their view that there is an overconcentration of PBSA delivery in the Stratford and Maryland neighbourhood based on the table below paragraph 5.3.14 in the LBN Topic Paper. This showed PBSA comprising 51% of all housing approvals and completions in the during the draft plan period from 2023.
- 1.28 However, this assessment is not a direct comparison and is based on PBSA bedspaces against conventional housing units. Conversely, the London Plan considers that PBSA makes a legitimate contribution to housing adopting a housing delivery ratio of 2.5 bed spaces to 1 housing units. We consider this to provide a more reliable and consistent comparison for housing delivery.
- 1.29 We note that the Inspector in the 302-312 High Street, Stratford appeal also disputed that there was an oversupply of PBSA in the area and that the imbalances in housing tenures locally are outweighed by the overall student bedspace demand.

² 23/00790/FUL – Stratford Campus Planning Permission, Planning Statement, paragraph 3.2

1.30 Table 1 below uses information from LBN’s Housing Trajectory FY2023.24 (Examination Reference EOD002) and LBN’s Topic Note to show the proportions of PBSA and housing delivery in the Stratford and Maryland Neighbourhood during the draft plan period from 2023. Full supporting details are provided in the tables in **Appendix 1**.

Table 1: PBSA and Housing Delivered/Consented in Stratford and Maryland Neighbourhood in Draft Plan Period.

Housing Type	Units (PBSA Housing Equivalent at (2.5:1 Ratio applied as per 2021 London Plan Policy H1)	%	Bedspaces (LBN Policy H8 calculation method using units for housing)	%
All Housing (C3 Use)	10,672	78%	10,672	60%
PBSA	3,050	22%	7,626	40%
Total	13,722	100%	18,956	100%

1.31 Table 1 shows that using the housing delivery ratio of 2.5 student bedspaces to 1 conventional housing unit from the London Plan, the current delivery and consenting of PBSA over the draft Local Plan period is 22%. This is below the proposed 25% threshold and demonstrates there is no overconcentration of PBSA delivery based on current rates.

1.32 Using delivery and approvals over the draft Local Plan period from 2023 also ignores the significant amount of conventional housing delivered as part of the area’s regeneration over the previous 10 years. If this was taken into account, the proportion of students in the local population and PBSA as part of housing delivery would be significantly lower.

1.33 Stratford is a relatively new education hub that has only recently emerged and previously had a lack of suitable student accommodation. Therefore, the increased proportion of delivery reflects the changing context of the Stratford area.

1.34 Consequently, using the more comparable housing delivery method, even over the short draft Local Plan period from 2023, the PBSA delivered and consented in the neighbourhood reflects the increased student bedspace demand in the area and forms a minority of the housing mix. This proportion is even smaller when considered with the existing housing delivery.

1.35 A degree of clustering of PBSA is also supported by Box 2 of the PBSA LPG where it suggests that PBSA policies should consider the value of some clustering, as opposed to dispersal to less suitable locations, particularly when associated with particular Higher Education Providers campuses.

1.36 As a result, the existing population mix and delivery over the draft Local Plan period does not show an overconcentration of PBSA and reflects the growing student bedspace demand in the area. Consequently, there is no need for locational restrictions on the Stratford and Maryland neighbourhood.

Summary

1.37 Overall, there is no reason for the additional Regulation 22 300m radius restrictions and more general locational restrictions on PBSA proposals in the Stratford and Maryland neighbourhood for the following reasons:

- The London Plan encourages PBSA to locations like Stratford that are within Opportunity Areas, Metropolitan Centres and areas that are well-connected and support of wider regeneration;
- There is an increasing student bedspace need in the area reflecting the growth of students studying in the area that is not being met; and

- There is no evidence that there is an overconcentration of PBSA or students as a proportion of the existing and future community mix.

1.38 Accordingly, there is no evidence to support the proposed locational restrictions on PBSA in the Stratford and Maryland neighbourhood, which are unsound with the London Plan and the associated PBSA LPG.

c) The requirements in part 3 for at least 60% affordable housing

1.39 IQL Office LP reiterates its concerns that the proposed affordable student bed requirement of 60% is unsound with the 35% requirement in Part 4 of Policy H15 of the London Plan and should be amended to be consistent.

1.40 The threshold approach for affordable housing and affordable student accommodation in the London Plan was set to provide clarity on viability for housing schemes, raising this threshold to 60% will have wider impacts on the viability and delivery of mixed-tenure housing and PBSA schemes.

Conclusions

1.41 IQL Office LP has concerns over the additional locational restrictions introduced into the Regulation 22 Policy H8 implementation wording. This unnecessarily restricts PBSA in highly accessible regenerations areas encouraged by the London Plan to meet a London-wide strategic need. In addition, the proposed affordable housing requirements inconsistent with the London Plan and will impact wider housing delivery.

1.42 As a result, the policy wording is unsound with the London Plan.

1.43 These concerns have been set out in our Statement, and we will be available at the relevant hearing session to summarise these concerns and answer any questions sought from the Inspector.

Appendix 1

Stratford and Maryland PBSA and Conventional (C3 Use Class) Housing Delivery and Approvals During Plan Period from 2023

The below information is based on the London Legacy Development Corporation Annual Monitoring Reports, LBN's evidence and planning application details from LBN's planning website.

Table 2: Updated Stratford and Maryland Neighbourhood PBSA Data from LBN's Purpose-built Student Accommodation Topic Paper 2025 (Submission Reference TP003 H8)

Scheme Name	Application Ref	Net number of bed spaces	2.5:1 Ratio applied as per 2021 London Plan Policy H1 ¹	Status
UCL East	17/00235/OUT_LLDC	1,276 (remaining in outline)	510	Approved
	18/00425/REM_LLDC	524	210	524 bed spaces completed in 2023/2024
Duncan House	15/00598/FUL (as amended by NMA refs: 17/00328/NMA and 17/00629/NMA)	511	204	Completed 2019/2020 – Outside of draft Local Plan period
Jubilee House	21/00483/FUL	716	286	<ul style="list-style-type: none"> Approved – September 2022 In construction
Poland House	20/00310/FUL	182	73	<ul style="list-style-type: none"> Approved – July 2021. In construction
Grove Crescent Road	21/02975/FUL	397	159	<ul style="list-style-type: none"> Approved – June 2023 In construction
IQL North	23/00441/FUL	909	364	<ul style="list-style-type: none"> Approved – November 2024 In construction
Plot M2, Car Park C, Westfield	24/00113/FUL_LLDC	520	208	<ul style="list-style-type: none"> Approved – November 2024
14 Marshgate Lane	23/00305/FUL	316	126	<ul style="list-style-type: none"> Approved – September 2024

302-312 Stratford High Street	25/01687/FUL	693	277	<ul style="list-style-type: none"> Resolution to Grant – November 2025
East Village Plot N16	23/00101/FUL	504	202	<ul style="list-style-type: none"> Approved – April 2024
Land adjacent to Meridian Steps	22/00178/FUL	952	381	<ul style="list-style-type: none"> Approved – August 2024 In construction
University of East London Stratford Campus	23/00790/FUL	650	260	<ul style="list-style-type: none"> Approved – August 2025
Total		8,150	3,260	-

Table 3: Updated LBN Local Plan Examination Housing Trajectory Data FY2023.24 for Stratford and Maryland Neighbourhood from 2019/20 Examination Reference EOD002)

Scheme name	Ref	Houses	Status
Chobham Manor	11/90621/OUTODA/ 13/00504/REM 14/00356/REM 16/00518/REM (Dev Parcel 6) 16/00510/REM (parcel 6.3)	514	353 Completed – 2019/2022 161 Completed – 2022/2023
Cherry Park/Angel Lane	10/90061/OUTODA 15/00358/OUT	1224	Completed – 2022/2023
East Village N05	14/00066/REM	48	Completed – 2022/2023
East Village N08	14/00034/REM	481	Completed – 2019/2020
East Village N06	17/00045/REM	524	Completed – 2020/2021
61 Broadway	20/02402/PRECOU	7	Completed – 2023/2024
Sub-Total		2,798	(1,440 Completed from 2023)
Chobham Farm	12/00146/FUM, 15/00266/REM 17/00175/REM 19/00473/REM	863	In construction
Land adjacent to Stratford International Station, International Way	19/00391/FUL	380	In construction
Land at Legacy Wharf Phase 2	21/00395/FUL	196	In construction

14 Marshgate Lane	17/00669/VAR; and 21/00455/FUL_LLDC	317	In construction
Sub-Total		1,756	In construction
Stratford Waterfront North	18/00470/OUT 24/00067/REM & 24/00068/NMA	700	Consented but not commenced
Chobham Farm North	24/00063/FUL	106	Consented but not commenced
East Village Plot N18/19	23/00090/REM	848	Consented but not commenced
IQL North	23/00441/FUL	672	Consented but not commenced
IQL South Plot S1/S11	21/00416/FUL	350	Consented but not commenced
68-70 High Street, Stratford	24/01905/FUL	355	Resolution to grant
Rick Roberts Way Gasworks	23/00457/FUL	247	Consented but not commenced
Rick Roberts Way LCS PDZ12	24/00115/VAR_LLDC	398	Consented but not commenced
Carpenters Estate	22/00360/OUT	1443	Resolution to grant
James Riley Point	21/00543/FUL_LLDC	4	Consented but not commenced
Odelia Court, 1B SA4.3	21/00172/PRNSDB	22	Consented but not commenced
Bridgewater Triangle	21/00403/OUT_LLDC	575	Consented but not commenced
Vulcan Wharf	20/00307/FUL	457	Consented but not commenced
Pudding Mill Lane	21/00574/OUT	956	Consented but not commenced
Land at Legacy Wharf (Phase 3) Pudding Mill	21/00460/FUL	343	Consented but not commenced
Sub-Total		7,476	Consented but not commenced
Total		10,806	



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