

[REDACTED]

From: Rebecca Burnhams [REDACTED]
Sent: 07 July 2026 14:33
To: bankssolutionsuk; Local Plan
Cc: [REDACTED]
Subject: Newham Local Plan - Proposed Main Modifications - comments on behalf of Telford Living
Attachments: 260707 Telford Living - Policy H8 comments on main mods.pdf

Dear Sir/Madam and Inspector,

On behalf of my client Telford Living, please find attached comments on the proposed main modifications to Newham's emerging Local Plan.

Comments relate specifically to draft Policy H8.

Kind regards

Becky

Rebecca Burnhams
Director
[REDACTED]

Quod
21 Soho Square
London, W1D 3QP
quod.com



Quod Limited, company number: 07170188 (England)

Disclaimer

This e-mail message and any attached file is the property of the sender and is sent in confidence to the addressee only. Internet communications are not secure and Quod is not responsible for their abuse by third parties, any alteration or corruption in transmission or for any loss or damage caused by a virus or by any other means.

Quod Limited, company number: 07170188 (England).

Registered Office: 21 Soho Square, London, W1D 3QP

For our privacy policy go to <http://www.quod.com/privacy-policy/>

Response Form for Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042

	Local Plan Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042 Response Form	Ref: (For official use only)
---	---	--

Name of the Local Plan to which this representation relates:

Newham Draft Submission
Local Plan

Privacy Notice

Who we are

London Borough of Newham (LBN) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBN ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042. It also provides additional information that specifically relates to this particular consultation, and should be read together with our [general privacy notice](#), which provides further detail.

What data do we collect and process

We collect your name, contact details, email address, job title and organisation if applicable and demographic equalities data if you choose to share it.

Why we collect your data

The consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. We collect your data so that we can get your views on the legal compliance or soundness of the Local Plan, as well as its compliance with the duty to co-operate.

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation is:

Article 6 (a) Consent: the individual has given clear consent for us to process their personal data for a specific purpose.

Article 9 (a) Explicit Consent: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

You can withdraw your consent at any time.

How we use your data

This data is collected, collated and then submitted to the Secretary of State, who will appoint an Inspector to conduct an independent examination of the Local Plan. Demographic data will be processed anonymously to assess the effectiveness of our consultation. Where you have consented, your contact details will be added to our consultation database for future consultations and updates on the Examination in Public. At submission representations will be made public on the council's website, including name of person and organisation if applicable making representation. Other

personal information will remain confidential. Representations, in full, submitted along with the Local Plan, evidence base and documents Submission Draft Newham required by legislation to the Planning Inspectorate and to the person the Secretary of State appoints as the Planning Inspector. Contact details will be made available to the Inspector and Programme Officer so they can contact individuals to participate in the Examination.

Consultation database is stored on Mailchimp and accessed by planning policy team only. Mailchimp stores names and email addresses of those on the consultation database in line with Mailchimp policies, particularly its [data processing addendum](#). Please be aware they may store personal data external to the UK specifically in the USA and/or EU.

Who we will share your data with

We will share your data with the Planning Inspector appointed by the Secretary of State, the Programme Officer appointed by Newham, and within the planning policy team. Your name and organisation (if applicable) will be published on our website along with representations upon submission. Demographic data will be processed anonymously to assess the effectiveness of our consultation.

How long we will keep your data

We will keep your data safe and secure for a period of 15 year(s) in line with our retention Schedule. After this time, it will be securely destroyed.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

Response Form

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

Anonymous responses cannot be accepted. Representations will be published with your name, but personal contact details will be kept confidential.

Personal Details*		Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent.</i>		
Title		Ms
Name		Rebecca Burnhams
Job Title (where relevant)		Director
Organisation (where relevant)		Quod
Address Line 1		21 Soho Square
Line 2		London
Line 3		
Line 4		
Post Code		W1D 3QP
Telephone Number		
E-mail Address (where relevant)		

Representor type (Please tick as appropriate)

Works in Newham	☐
Statutory Consultee	☐
Resident	☐
Elected official	☐
Developer	☒
Community Group Representative	☐
Business owner	☐
Other (please specify)	

Part B – Please use a separate sheet for each representation

Name or Organisation: Telford Living

What chapter is your response referring to?

Please tick as appropriate

Vision and Objectives		Building a Fairer Newham	
Design		High Streets	
Social Infrastructure		Inclusive Economy	
Homes	X	Green and Water Spaces	
Climate Emergency		Transport	
Waste and Utilities			

Neighbourhoods - N1 North Woolwich		Neighbourhoods - N2 Royal Victoria	
Neighbourhoods - N3 Royal Albert North		Neighbourhoods - N4 Canning Town	
Neighbourhoods - N5 Custom House		Neighbourhoods - N6 Manor Road	
Neighbourhoods - N7 Three Mills		Neighbourhoods - N8 Stratford and Maryland	
Neighbourhoods - N9 West Ham		Neighbourhoods - N10 Plaistow	
Neighbourhoods - N11 Beckton		Neighbourhoods - N12 East Ham South	
Neighbourhoods - N13 East Ham		Neighbourhoods - N14 Green Street	
Neighbourhoods - N15 Forest Gate		Neighbourhoods - N16 Manor Park and Little Ilford	
Neighbourhoods - N17 Gallions Reach			
Other (please specify)			

What is the Main Modification or map change reference(s) you are commenting on?

You can find the modification reference in the main modifications table. We acknowledge an issue may relate to more than one Main Modification, in which case please reference all relevant modification references.

ED030: Proposed Main Modifications for Consultation: MM57 and MM58
ED034: Proposed Additional Modifications: AM91 – AM98

Response

Please focus your comments only on the Proposed Modifications and please provide:

- The Main Modification or Policies Map change reference(s) you are commenting on
- Whether you consider the modification legally compliant and/or sound
- If unsound, which test(s) of soundness it fails and the change you seek
- Any evidence supporting your view
- Any alternative wording you wish to propose

This consultation should not be used to:

- Repeat comments previously made at Regulation 18 or 19 stages
- Comment on parts of the Plan that are not subject to a Proposed Modification

While we welcome the Council's continued engagement with representations made during the examination process, we remain concerned that the proposed modifications do not adequately address fundamental issues previously raised in relation to the emerging Purpose-Built Student Accommodation ('PBSA') policies, specifically policy H8.

Telford Living specialise in the delivery of high quality homes and sustainable communities and have a strong track record in Newham having delivered a significant number of new homes at Upton Park, New Garden Quarter and Gallions Quarter. They are also responsible for the delivery of two transport infrastructure sites owned by the Department for Transport / London St Pancras Highspeed – International Way West (Rondo) which secured planning permission for 380 BTR homes in 2021 and International Way East, which is shortly due to be subject to a planning application for c. 750 bed PBSA proposal.

Ongoing Concerns – Student Accommodation Policy Approach

Our principal concern relates to the continued inclusion of a highly restrictive locational approach to purpose-built student accommodation (PBSA). The Examination in Public did not appear to meaningfully consider the appropriateness or justification for constraining student accommodation to a narrowly defined radius within the Stratford area. This was raised by several objectors during the Examination in Public and within representations to the Local Plan. The student operator Unite specifically covered this point in their representations. Little consideration appears to have been given to the extensive evidence provided and the level of objection received.

The approach of draft Local Plan Policy H8 is not aligned with the strategic direction of the London Plan (2021), notably:

- Policy H15 (Purpose-Built Student Accommodation), which supports PBSA where it meets identified need and is in a suitable location, without prescribing overly narrow spatial limitations
- Policy GG2 (Making the Best Use of Land), which encourages optimisation of site capacity in well-connected locations;
- Policy SD1 (Opportunity Areas) and wider growth strategies, which support flexibility in accommodating different land uses where they contribute to sustainable development objectives.

In our view, the application of a restrictive locational policy within the Stratford area:

- Risks undermining the ability to optimise delivery of PBSA in accessible and sustainable locations, contrary to Policies GG2 and H15
- Fails to recognise the contribution of PBSA to London-wide housing supply, including its role in freeing up conventional housing stock. The Strategic Housing Market Assessment (June 2022) which forms part of the evidence base recognises the 'significant' growth in the number of students within the private rental sector which is expected to continue. The policy as drafted does not make sufficient provision to deal with this increased pressure.
- Does not appropriately reflect the London Plan's generally criteria-based approach, which allows for flexibility in responding to need. The draft policy recognises the growth of local educational institutions but does not proactively address the accompanying need for further student accommodation.
- Places onerous restrictions of the development of new PBSA uses within Stratford, which are fundamental to supporting the growth of new Higher Educational Institutions within the Queen Elizabeth Olympic Park. This could undermine the function of the park to support world class HEI's from competing with other global cities.

The overly prescriptive nature of the locational criteria may prevent otherwise suitable sites—well-connected by public transport and compliant with wider planning objectives—from coming forward.

Lack of Adequate Justification and Evidence

We remain unconvinced that the Council has provided proportionate or robust evidence to justify such a restrictive spatial approach, particularly when considered against London Plan expectations.

Policy H15 requires boroughs to ‘demonstrate need and ensure provision is well-related to higher education institutions by public transport’ but does not mandate tight locational zoning. In this context:

- There is limited clarity as to why sites outside the identified locations would be unsuitable in principle, especially where they comply with Policy T1 (Strategic Approach to Transport) in terms of connectivity;
- The evidence base does not appear to sufficiently explore alternative policy approaches that would align more closely with the criteria-based framework of the London Plan;
- There is little to no evidence as to why a 300m distance is appropriate with the H8 PBSA Topic Paper (2025) referring to two appeal decisions which date back almost 20 years as justification for the proposed 300m distance;
- The approach risks conflicting with the requirement for Local Plans to be ‘positively prepared and justified’ under the NPPF, particularly where it departs from strategic policy without clear justification.

Draft Policy H8 sets out that ‘the policy seeks to prevent additional student housing delivery in the Stratford and Maryland neighbourhood unless linked to a campus-based expansion’.

Justification in 3.188 sets out that ‘high levels’ of student accommodation have been approved in the Stratford and Maryland neighbourhood since the financial year 2019/20 and that the supply is outpacing the need identified within the Borough’s housing need assessment. The Council’s Strategic Housing Market Assessment (SHMA) confirms that an annual figure of 210 PBSA bed spaces has been arrived at by dividing the London Plan annual requirement of 3,500 PBSA bed spaces by the number of full-time students expected to be enrolled in Newham’s HEI’s from 2023 onwards. This figure is given as over 25,000 students, broken down into numbers of students studying at UEL, UCL and LCF. It does not include students at Loughborough and Staffordshire Universities, Teeside University, Arden University or the University Campus of Esports. The data is therefore not sufficient for predicting identified need and subsequently fails to make sufficient provision for the expected growth in students.

The justification to the policy also fails to recognise that a high proportion of students, and indeed projected student growth, are focused within the Stratford area. This substantial growth in Higher Educational Institutions needs to be supported by the growth of student accommodation. By precluding the Stratford and Maryland areas, this does not promote the delivery of student accommodation adjacent to existing and growing campuses, and within sustainable locations.

Consideration of Previous Representations

We are concerned that the Main Modifications do not appear to fully reflect or respond to the substantive objections raised during earlier stages of the examination. Specifically:

- It is unclear how the Inspector has considered concerns regarding consistency with London Plan Policy H15 and the lack of flexibility in the Borough’s approach
- The modifications do not demonstrate that reasonable alternatives—such as a criteria-based policy approach—have been properly tested
- There remains limited transparency as to how representations relating to alignment with strategic London Plan policies have been weighed.

We respectfully request that further clarification is provided as to how these matters have been considered.

Soundness and Effectiveness

As currently drafted, we consider that the student accommodation policy risks fails the tests of soundness, in particular:

****Positively prepared**** – by unduly constraining delivery against both local and London-wide need identified under Policy H15

****Justified**** – due to insufficient evidence supporting a departure from the London Plan’s more flexible, criteria-led approach;

****Effective**** – given the likelihood that restrictive zoning will limit market responsiveness and delivery across the Plan period;

****Consistent with national policy**** – particularly in terms of supporting housing delivery and flexibility.

Suggested Way Forward

To address these concerns, we recommend removing or significantly relaxing the restrictive locational policy within the Stratford area and aligning more closely with London Plan Policy H15. This could comprise introducing a criteria-based approach that allows PBSA to come forward across the borough where proposals:

- Demonstrate need
- Are in accessible, well-connected locations (consistent with Policies T1 and GG2)
- Meet appropriate design and amenity standards
- Demonstrate that they do not preclude the delivery of residential development, i.e. on allocated residential sites
- Providing further evidence and justification where any spatial limitations are retained, clearly demonstrating alignment with London Plan objectives.

Conclusion

In summary, while we acknowledge the efforts made through the Main Modifications, the current approach to student accommodation remains overly restrictive and insufficiently justified. It is not clearly aligned with the London Plan’s strategic framework, particularly Policy H15 and the wider emphasis on optimising land use and supporting delivery.

Without further amendment, the policy risks undermining the Plan’s overall effectiveness, flexibility, and soundness.

We trust these comments will be given full and careful consideration.

Do you wish to be notified about future Examination stages:

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 7th July 2026