

[REDACTED]

From: Sankey, Izzy [REDACTED]
Sent: 07 July 2026 15:34
To: Local Plan
Cc: [REDACTED]
Subject: Proposed Main Modifications to the Newham Local Plan consultation - Response on behalf of University College London
Attachments: Combined Main Mods Response Form + FINAL UCL Representations - Newham Main Modifications - 07 July 2026.pdf

Dear Sir / Madam,

Please see attached a representation for the 'Proposed Main Modifications to the Newham Local Plan' consultation. This is submitted on behalf of our client University College London (UCL), which is a significant landowner within the Queen Elizabeth Olympic Park, Stratford, who are seeking to establish a new university campus 'UCL East' within this location.

The 'Response Form for Consultation of Proposed Main Modifications to the Newham Local Plan 2026 – 2042' has been submitted in conjunction with this letter, which is included within the Appendix (– please see the attached document).

Additionally, in accordance with the 'Statement of Representations Procedure', I can also confirm all of the required information is provided within the response form and appended representations letter.

Please can you confirm receipt?

Please also do not hesitate to get in contact with either myself or my colleagues Nathan or Jeremy (cc'd).

Kind Regards

Izzy Sankey

Pronouns: she / her / hers

Assistant Manager | Real Estate | Deloitte LLP

D: [REDACTED]

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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)
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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)

**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.*

Title	c/o Agent	Mr
Name	c/o Agent	Jeremy Castle
Job Title (where relevant)		Director
Organisation (where relevant)	University College London	Deloitte LLP
Address Line 1		66 Shoe Lane
Line 2		London
Line 3		
Line 4		
Post Code		EC4A 3BQ
Telephone Number		XXXXXXXXXX
E-mail Address (where relevant)		XXXXXXXXXX

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:

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	✓	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.

Main Modifications Ref.

- MM5
- MM6
- MM8
- MM10
- MM16
- MM17
- MM18
- MM40
- MM57
- MM64
- MM92
- MM94
- MM177

Additional Modifications Ref.

- AM62
- AM219

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

Please refer to the Representations Letter prepared by Deloitte LLP, on behalf of University College London (dated 07 July 2026) which is Appended to this form.

Do you wish to be notified about future Examination stages:

Yes ☒ No ☐

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

Appendix – UCL Response, prepared by Deloitte LLP (dated: 07 July 2026)

[Please see following page]

07 July 2026

Planning Policy Team
London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

Dear Sir / Madam,

London Borough of Newham Draft Local Plan – Main Modifications Consultation

Introduction

On behalf of our client, University College London (UCL), we write in response to the London Borough of Newham (LBN) Draft Local Plan Main Modifications Consultation. UCL welcomes the opportunity to provide comments on the content of these modifications to the Draft Local Plan.

UCL is London's leading multidisciplinary university, with 16,000 staff and 50,000 students. UCL provides excellence and leadership in teaching and research. UCL was ranked ninth in the QS World University Rankings 2026 and is among the top 10 universities ranked by The Guardian. UCL competes on a global stage with other top-rank universities overseas (such as Harvard, Yale and Stanford) and in the UK (such as Oxford, Cambridge and Imperial College). In order to attract the best students, researchers and academic staff, and the brightest undergraduates, it is essential to be able to offer world class facilities and a high-quality learning environment.

UCL East

As part of a world-class cultural and education destination within the Queen Elizabeth Olympic Park (QEOP), UCL is working to establish a new university campus, UCL East. UCL East is considered a new model for how a university campus can be embedded in the local community, providing world-leading research, education, entrepreneurship and innovation. UCL East is the largest single expansion of UCL's estate since its foundation in 1826. Phase 1 of the campus comprises Marshgate Plot 1, predominantly academic spaces, and One Pool Street, forming the first on-site student

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accommodation. Together, these provide 50,000 sqm of floorspace, including 524 student accommodation rooms in One Pool Street.

The provision of world class teaching and research space and student accommodation are regarded as essential components of UCL's ability to attract high quality students and staff, both from the UK and abroad. Student choices are increasingly driven by the wider 'student experience' of which the provision of high-quality learning and living accommodation is considered a key aspect.

One Pool Street was occupied in November 2022. Marshgate Plot 1, which also includes a café, refectory and community and engagement uses, was occupied in September 2023.

The remainder of the campus land is subject to an Outline Planning Permission granted in May 2018. While UCL considers its approach to delivering the remaining phases of permanent development, it has a strategy to provide meanwhile uses that provide benefits to the local community.

With the above in mind, UCL has a strong interest in the development of planning policy within the QEOP area and Newham, especially with LLDC transferring its planning powers to LBN on 30 November 2024. This interest is evidenced by UCL's previous representations submitted to LBN's Local Plan Refresh Issues and Options consultation in December 2021, the draft Local Plan's Regulation 18 consultation in February 2023 and the draft Regulation 19 consultation in September 2024. On behalf of UCL, we now submit the following comments in relation to the Local Plan Main Modifications Consultation.

Building a Fairer Newham

Policy BFN1: Spatial strategy

UCL supports the increased flexibility included within Implementation Table BFN1.5 (NB the Main Modifications document should refer to it as **BFN1.8**), which has been amended to include additional flexibility around application of BREEAM Excellent requirements for meanwhile uses through the inclusion of "***as and where applicable to the proposed use***" and for "***An exception to the meet BREEAM excellent may be made for temporary structures seeking permission for a shorter time period***".

However, UCL objects to the addition to Implementation Table BFN1.8 that states "***Where this is allowed, extensions in time are unlikely to be granted, to avoid long-term poor quality development***".

UCL objects to the negative drafting of this additional text, as it does not consider it to be conducive to enabling high-quality long-term masterplanning and may act as a barrier to delivering effective and important meanwhile uses which activate spaces and support local communities while longer-term redevelopment ambitions are developed and brought forward.

UCL proposes that the drafting is made more positive, to reflect the circumstances of individual proposals, as follows:

“Where this is allowed, extensions in time will be granted if the meanwhile uses do not result in poor quality development in the long term or where required to facilitate the construction of an approved development, where permitted development rights are not available”

Policy BFN2: Co-designed masterplanning

UCL supports the amendments to Policy BFN2. It supports the references to phased development and the amendments to the policy text about activating phased sites through meanwhile use strategies.

Design

Policy D1: Design Standards

UCL objects to the addition of ***“Nevertheless, it will rarely be justifiable to grant a second temporary permission, except in cases where changing circumstances provide a clear rationale”*** within Implementation Table D1.4.

UCL considers that the addition of this text is overly restrictive, particularly for large multi-phased development sites. UCL would prefer that the sentence is deleted. However, if the sentence is retained, it proposes that the second half of the sentence should include the following additional exception:

“or where required to maintain active use of long term multi-phase development sites”.

UCL supports the additional text which has been added to Implementation Table D4.1, but suggests that the following additional clarifications are included:

“The choice of construction methods, landscaping, materials and finish should take into account the character of the local context and the impact on the public realm and amenity, balanced against the expected timeframe and scale of the development, to ensure requirements are proportionate to the proposal.”

Policy D4: Tall buildings

UCL welcomes the inclusion of more flexible language regarding building height within draft Policy D4 and Table 1: Tall Building Zones.

UCL also supports the additional confirmation in Policy D4 Part 2(a) about the clustering of tallest buildings into TBZ13, TBZ15 and TBZ19.

Social Infrastructure

Policy S13: Cultural facilities and sport and recreation facilities

UCL welcomes the additions to Policy S13 Part 2 (b) (i) and ii). UCL appreciates the consideration given to the needs of existing and future users, as well as the reflection of how space accommodates various uses and its overall role.

Inclusive Economy

Policy J1: Employment and Growth

Within Implementation Table J1.2, it is noted that the Council proposes to include text to require planning conditions to limit uses within Class E. UCL supports the distinction in the paragraph about requiring a condition for development on site allocations “*where necessary and justified*”. It is important that the policy is not interpreted as requiring a condition for development on site allocations, unless there is a specific reason for limiting changes of use within Class E.

To make the approach clearer in this respect, UCL proposes two small changes, as identified in red below:

“All future developments incorporating office (E(g)(i)), research and development (E(g)(ii)) and/or light industrial (E(g)(iii)) floorspace within SILs, LILs, and **only** where necessary and justified within site allocations identified for mixed use or employment-led development, will be secured through conditions to limit uses consented within Class E, in order to achieve the objective of this policy”.

Homes

Policy H8: Purpose-built student accommodation

UCL supports the addition of “**or approved** campus development” at Parts (1)(a) and (2)(a) of Policy H8. This amendment aligns with the ambitions and approved consents for UCL East, thereby facilitating future PBSA development in its proximity.

UCL also supports the amendments to Part (3), where the approach to affordable student accommodation is amended to be consistent with the London Plan requirements.

Policy H11: Housing Design Quality

UCL supports the alignment of Policy H11, Part 3 (e) with London Plan Guidance: Purpose-built Student Accommodation in relation to accessible PBSA.

Neighbourhoods

Section 4: Neighbourhoods

Section 4: Neighbourhoods outlines the approach and site allocations for each of Newham's 17 neighbourhoods, including N8 Stratford and Maryland. Within the Implementation Table for these Neighbourhood Policies, UCL supports the insertion of the following clarifications on how site allocations are to be delivered:

“Each site allocation includes illustrative diagrams showing how development could be delivered. These diagrams are indicative and demonstrate how the principles and requirements in this section might be implemented. The delivery of these sites will be shaped through co-designed masterplanning in accordance with policy BFN2 which may demonstrate that an alternative layout could deliver outcomes consistent with the allocation policy and other policies in the Plan.

When determining an application, flexibility may be applied to the site allocation requirements based on an up-to-date assessment of need and the agreed viability position of the scheme. This approach ensures that the site allocations remain deliverable within the context of sustainable development.”

This additional text ensures an appropriate level of flexibility for the implementation of site allocations to support the successful determination of planning applications. This flexibility is crucial, as it allows for the consideration of agreed viability positions, assessments of need and up-to-date evidence when bringing forth site-specific proposals, particularly at N8.SA6 Stratford Waterfront South.

N8 Stratford and Maryland & N8.SA6 Stratford Waterfront South

UCL supports the renaming of the map to be “***Indicative Diagram Map***” and considers this to be a positive and appropriate description to ensure an appropriate degree of flexibility in delivering site allocations (as discussed above).

UCL also supports the inclusion of the flexible language regarding maximum heights within the site allocation, as mentioned previously in response to draft Policy D4.

It is noted within the draft site allocation, that there is the addition of the following wording “*development on site should follow Local Plan Policy J3*” under ‘Development Principles’. UCL requests that this reference specifies Part 4 of Policy J3 only, as it applies to developments in site allocations.

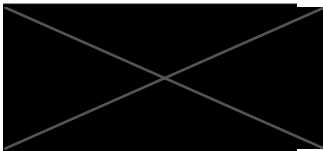
Conclusion

In summary, UCL is largely supportive of the principles set out in the Main Modifications consultation document of the Draft Newham Local Plan. In this letter, we have proposed some further changes to the plan in response to UCL's further comments.

On behalf of our client, we would be grateful for the opportunity to work further with LBN to help shape forthcoming planning policy.

If you have any queries with regard to the comments set out in this letter, please contact Izzy Sankey ([REDACTED]). In the meantime, we would be grateful for confirmation of receipt of this letter.

Yours faithfully

A black rectangular box with a white 'X' drawn across it, used to redact a signature.

Deloitte LLP