

Sara Chiong

From: Marcus Stuart <[REDACTED]>
Sent: 18 September 2024 17:29
To: Local Plan
Cc: [REDACTED]
Subject: Representations for Regulation 19 Consultation for the Draft Submission Local Plan - On Behalf of University of East London
Attachments: Newham Local Plan Review Regulation 19 Representation.pdf
Follow Up Flag: Follow up
Flag Status: Completed

You don't often get email from [REDACTED]. [Learn why this is important](#)
Good afternoon,

Please see our representations made in relation to Newham's Regulation 19 stage of the draft Local Plan. These representations are made on behalf of our client, the University of East London.

Please let us know if you have any queries.

Kind regards,

Marcus Stuart
Senior Planner
direct: [REDACTED]
mobile: [REDACTED]
e-mail: [REDACTED]

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

18 September 2024

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

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Registered No. 05092507

0207 004 1700

www.dp9.co.uk

Dear Sir/Madam

**LBN DRAFT LOCAL PLAN (REGULATION 19 CONSULTATION)
SUBMISSION OF WRITTEN REPRESENTATIONS**

We write on behalf of our client, University of East London ('UEL'), to provide written representations to the London Borough of Newham ('LBN') Draft Local Plan (Regulation 19) ('the Draft Plan'), which is currently subject to public consultation.

UEL is one of the largest higher education providers in the borough, with three major campuses located at Docklands, Stratford and University Square Stratford. Our client therefore has a keen interest in the direction of emerging Local Plan policy, as well as LBN's objectives for development within the borough. UEL therefore welcomes the opportunity to submit written representations as part of the Regulation 19 consultation.

In principle, UEL is encouraged by the strategic vision set out in the Draft Plan, including the proposed design-led approach for future development and the proposed public realm net gain requirement for new development, addressing both quantitative and functional gains. UEL would, however, wish to provide further comments below in relation to specific policies set out within the Draft Plan.

Draft Policy D4: Tall Buildings

The wording of Draft Policy D4 defines tall buildings as those being at or over 21m, measured from the ground to the principal top of the building. UEL would note that there have been amendments to the wording of this draft policy since Regulation 18 consultation, including the an amendment in the technique of measurement to now no longer include measurement to the parapet.

Draft Policy D4 notes that tall buildings will only be acceptable, subject to detailed design and masterplanning considerations, in areas marked on the Policies Map as 'Tall Building Zones', and that the height of tall buildings in any 'Tall Buildings Zone' should not exceed their respective limits set out. Part 3 of the Regulation 19 wording expresses in finer detail London Plan Policy D9, including the need to show architectural expression at all levels, provide public

viewing galleries and have plans independently reviewed by panel, a new Planning Obligation section also states that free to enter publicly-accessible areas in tall buildings may be secured where in appropriate locations and in line with the policy requirements.

UEL consider the wording of the draft policy to be too severe and not consistent with the objectives of positive plan-making, as set out in the NPPF, as it fails to take into account site-specific circumstances where tall buildings may be appropriate outside of designated Tall Building Zones. Therefore, it is suggested that the policy wording is relaxed, specifically in relation to the statement that “*tall buildings will only be acceptable*” [own emphasis], to instead state that “*tall buildings will generally be acceptable...*” [own emphasis].

UEL would also wish to promote the UEL Stratford Campus as an appropriate site for designation as a ‘Tall Building Zone’, having regard to the substantial site area, the existence of a building within the existing campus which would already be defined as a ‘tall building’ in line with the Draft Plan definition and the recent resolution to grant planning permission by the LBN Strategic Development Committee for a new tall building within the Stratford Campus adjacent to the Arthur Edwards Building demonstrating that Officers and Members have accepted that Stratford Campus as an appropriate location for tall buildings.

Draft Policy H8: Purpose-Built Student Accommodation (‘PBSA’)

The wording of Draft Policy H8 notes that new purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where

- a) It is located within or adjacent to an existing campus development in the neighbourhood; or
- b) It is solely providing a replacement facility with no net increase in bed spaces.

Noting similar comments with regards to policy that asks similar demands for PBSA located outside of these neighbourhoods (added text regarding ensuring there is not an over-saturation), UEL would wish to comment that the text requiring new PBSA to be a replacement facility with no net increase in bed spaces should be removed as it is too onerous. Further, part 1 of this policy should be expanded to include reference to UEL’s Docklands Campus for which it is considered that further student accommodation to support the campus may be appropriate.

Draft Policy H8 also sets out that new purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021 and that developments for purpose built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered. UEL consider that this target of 60% to be excessive and should therefore be reduced, particularly where PBSA proposals are being brought forward directly by Higher Education Providers. As presently worded, the requirement to deliver 60% affordable would have a significant impact on the future viability and delivery of PBSA within the borough. It is considered also that there should be provision built in to ensure that such a stringent level of affordable accommodation should not be required if the PBSA is being applied for by a higher

educational establishment and/or directly nominated to such an establishment. UEL is conscious that they are building to meet demand, but such a policy would still require a high level of affordable student housing nonetheless.

Neighbourhoods – N3 – Royal Albert North

Neighbourhood N3 in the Draft Plan sets out the neighbourhood area vision for Royal Albert North (where the Docklands Campus is located – previously titled N4 in the Regulation 18 Plan), and states that the neighbourhood area will be *‘vibrant and cohesive neighbourhood, home to new high quality employment uses, higher-education campus and residential developments. These uses will be supported by a new neighbourhood parade at Royal Albert Quay and open space. The neighbourhood, and the University of East London in particular, will be successfully integrated into the wider network of neighbourhoods, with improved connections to neighbouring town centres and open spaces, particularly those in Beckton.’*

Our client has highlighted that the Docklands Campus is co-located within the same designated area as the Royal Albert Dock (RAD) development, which is embarking on a new chapter to integrate alongside the Docklands Campus and bring with it essential, sustainable growth in this area to the benefit of local people, the economy and environment within the surrounding area. UEL has already positively engaged with the new investment team for RAD, who recognise the importance of UEL as a key neighbour. The importance of a joined-up approach between both of these key stakeholders should therefore be reflected in the vision for Neighbourhood N3. The draft policy wording which supports growth in training and economic opportunities for green and low carbon industries and encourages developments to establish strong links with the University of East London to support skills, training and career development is supported, as is the policy wording around supporting improvements to the University of East London campus, including protecting and supporting enhancements to playing pitches.

Furthermore, as work is underway regarding preparation of the Royal Docks and Beckton Riverside Opportunity Area Planning Framework (OAPF), which encompasses a number of neighbourhood areas (including Neighbourhood N3), it is important that a consistent approach is taken in relation to the visions set out in the Draft Plan and the recently adopted OAPF.

Neighbourhoods - N8 – Stratford and Maryland

Neighbourhood N8 in the Draft Plan sets out the neighbourhood boundary for Stratford and Maryland. It should first be noted that the boundary dissects the existing UEL Stratford Campus at Water Lane, effectively positioning University House into a separate neighbourhood area and its associated vision. UEL commented at Regulation 18 stage that the boundary of Neighbourhood N8 should be amended to include the entirety of the UEL Stratford Campus to ensure consistency in how the area vision is applied across the Stratford Campus and would wish to reiterate this request.

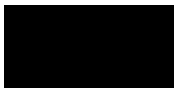
Our client has also raised some concern that the proposals for the redevelopment of the UEL Stratford Campus would represent one of the only major development schemes with the

proximity of the new Elizabeth Line station at Maryland, unlike the surrounding areas of the majority of other Elizabeth Line stations which have seen expansive development growth, reflecting their increased accessibility and connectivity resulting from proximity to the new Elizabeth Line. Our client considers that development opportunities within Neighbourhood N8, should be recognised in the Draft Plan, potentially through the allocation of additional appropriate sites within the N8 boundary.

At the heart of Stratford East is the Stratford Youth Zone (Theatre Square, Salway Place, Stratford). The Stratford Youth Zone aligns directly with the strategic growth and diversification of UEL's School of Arts & Creative Industries (ACI). Using connections back into the cultural sector, the aim of the School of ACI will be to work closely with the Youth Empowerment Service to develop and deliver meaningful creative opportunities for young people as well as develop the culture of the building, ensuring young people are at the heart of everything at the Youth Zone. UEL would wish to reaffirm its commitment to the Stratford Cultural Quarter and therefore reiterate its suggestion made at Regulation 18 consultation that the vision for Neighbourhood N8 is amended to set out the importance of reinvigorating the immediate area, focusing on measures to attract footfall and discourage anti-social behaviour.

We trust our comments are useful as LBN progresses with the preparation of the Draft Plan and we look forward to engaging further with you at the next stage. Should you have any queries or wish to discuss any of the above then please contact David Shiels or Marcus Stuart at the above office.

Yours faithfully,



DP9 Ltd.