

Sara Chiong

From: Williams, Emma [REDACTED]
Sent: 20 September 2024 13:20
To: Local Plan
Cc: [REDACTED]
Subject: LBN Regulation 19 Representations
Attachments: Hadley_LBN Reg 19 Reps_Form.pdf; Hadley_LBN Reg 19 Reps_September_2024.pdf

Follow Up Flag: Follow up
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Dear Sir / Madam,

On behalf of our client, Hadley Property Group, please see attached representations to the London Borough of Newham Draft Submission Local Plan (Regulation 19) Consultation. If you have any questions about the representation or require further information, we would be happy to discuss in further detail.

I would be grateful if you could confirm receipt, and request to be kept informed on progress of the Newham Local Plan process.

Kind regards,

Emma Williams

Senior Associate | FA - Real Assets Advisory | Deloitte LLP

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Response Form for Regulation 19 Consultation.

| | | |
|---|--|--|
|  | <p>Local Plan Publication Stage Response Form</p> | <p>Ref:</p> <p>(For official use only)</p> |
|---|--|--|

**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

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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 Newham Local Plan Review Consultation (Regulation 19). 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 only 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 is not shared with the Planning Inspector or the Programme Officer.

We will not share your personal information with any other third parties unless you have specifically asked us to, or if we have a legal obligation to do so.

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.

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Response Form

For guidance on how to complete this representation form please view the Regulation 19 Consultation Guidance <https://www.newham.gov.uk/planning-development-conservation/newham-local-plan-refresh>.

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

| 1. Personal Details* | 2. 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 in 2.</i> | |
| Title | Mr |
| First Name | Jeremy |
| Last Name | Castle |
| Job Title (where relevant) | Director |
| Organisation (where relevant) | Deloitte LLP |
| Address Line 1 | |
| Line 2 | |
| Line 3 | |
| Line 4 | |
| Post Code | |
| Telephone Number | |
| E-mail Address (where relevant) | |

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate? (Please be as specific as possible)

Policy

Implementation Text

Paragraph

Policies Map

4. Do you consider the Local Plan is :

| | | | | |
|---|-----|----------------------|----|--------------------------------|
| 4.(1) Legally compliant | Yes | <input type="text"/> | No | <input type="text" value="x"/> |
| 4.(2) Sound | Yes | <input type="text"/> | No | <input type="text" value="x"/> |
| 4 (3) Complies with the Duty to co-operate | Yes | <input type="text"/> | No | <input type="text" value="x"/> |

Please tick as appropriate

5. Please give details overleaf of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to appended response letter.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to appended response letter.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☒

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Do you wish to be notified about:

a. the submission of the local plan for independent examination

Yes ☒ No ☐

b. the publication of the Inspector's report

Yes ☒ No ☐

c. the adoption of the Local Plan

Yes ☒ No ☐

10. Would you like to be added to our consultation database to be notified about future planning policy consultations?

Yes ☒ No ☐

Please return to London Borough of Newham by 5pm 20th September 2024

20 September 2024

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

Dear Sir/Madam,

London Borough of Newham Draft Local Plan Regulation 19 Consultation Representations on behalf of Hadley DM Services Ltd and Hadley Stratford Development Ltd

Deloitte is instructed by Hadley DM Service Ltd and Hadley Stratford Development Ltd ('Hadley') to submit representations on the Newham Local Plan Review in respect of International Quarter London North ('IQLN') and Rick Roberts Way ('RRW') in Stratford. Through the forthcoming development of these sites, Hadley has an active interest in the formulation of planning policy at the London Borough of Newham ('LBN') and welcomes the opportunity to respond to the Draft Submission Local Plan ('DSLPL') through this Regulation 19 consultation.

Previous Response to the Regulation 18 Draft Plan

On behalf of Hadley, Deloitte submitted representations in response to the LBN Regulation 18 Draft Local Plan in February 2023.

As a result, Hadley would like to continue engaging with LBN to contribute to positive and effective changes in response to this consultation.

Regulation 19 Draft Submission Local Plan

Following the Regulation 18 consultation, Hadley notes that there have been a number of positive amendments to the policy wording in the DSLP. However, concerns remain regarding the lack of consistency with the adopted LLDC Local Plan and site allocations.

Building a Fairer Newham

Policy BFN1: Spatial Strategy

Hadley continues to support the spatial strategy of directing growth to the borough's neighbourhoods and making the best use of land through optimising development, specifically the inclusion of the Stratford and Maryland neighbourhood as an area where significant levels of growth will be directed. This approach reflects Stratford's position as a Metropolitan Centre, with the potential to be an International Centre.

While Hadley supports LBN taking a strategic view on the provision of social infrastructure within the spatial strategy, given the requirements for the provision of a significant quantum of affordable housing required as part of the Legacy Communities Scheme (LCS) (ref. 11/90621/OUTODA) and the requirement for a school within the RRW LLDC site allocation, a dedicated sports facility cannot feasibly be provided on this constrained site. The Urban Design and Landscape Framework for RRW aims to deliver a target of 750 homes and a secondary school with sixth form. A more detailed response to this is set out below response to the site allocation.

Hadley is encouraged by the supportive stance for meanwhile uses and its inclusion within the spatial strategy. Hadley has an extensive meanwhile use strategy in place for the IQLN site which includes the reuse of a former marketing suite to provide a temporary community centre alongside a temporary community garden, community sauna, café kiosk and construction skills academy. Hadley does, however, suggest that the policy's supporting text in paragraph BFN1.8 stating that meanwhile uses should last 5 years or fewer and a second temporary permission is rarely justifiable could lead to sites remaining vacant for long periods of time where market conditions have prevented the long-term redevelopment coming forward in the expected time. Hadley suggests additional wording should be added to clarify in which circumstances extensions to temporary permissions for meanwhile uses would be acceptable.

Hadley opposes the supporting text stating that meanwhile use applications must meet BREEAM excellent and comply with climate emergency policies. While it is correct that uses with low environmental impact are encouraged, it is considered that these requirements are not appropriate to the scale of meanwhile uses and add unnecessary prerequisites to gaining planning permission for the temporary uses. Meanwhile uses should, in their temporary nature, be able to be dismantled easily and quickly to enable long-term development to commence on site. By their nature, meanwhile uses have a low environmental impact, so adding additional requirements to demonstrate this may result in beneficial meanwhile uses not coming forward.

Policy BFN2: Co-designed masterplanning

Hadley supports the approach of Policy BFN2.2 to “*undertake co-designed masterplanning*”. However, it suggests that the wording is too broad and does not set out best practice and the Council's expectation as to which processes should be followed to best include local stakeholders in the design of developments.

Hadley requests that further clarification is provided within the supporting text of BFN2.5 on what types of questions will be asked through the post-occupancy surveys and how the results will be used.

BFN3: Social Value and Health Impact Assessment – delivering social value, health and wellbeing

Hadley is committed to ensuring that its developments deliver social value by empowering communities and delivering sustainable places. Hadley is supportive of the policy approach to maximise social value and make a positive contribution to the health and wellbeing of communities.

Hadley is, however, concerned by the requirements for a Social Value-Health Impact Assessment ('SV-HIA') and how this will be applied to planning applications. While policy identifies specific development types that may require an SV-HIA, the current supporting text in paragraph BFN13:3 goes on to suggest that any development type could require an SV-HIA and this may be required at “any stage” of the planning application process. Hadley requests further clarification to this policy on the criteria for when an SV-HIA is required, including the scale and type of development proposed, as well as a clearer timeframe for requiring an SV-HIA.

Design

Policy D1: Design standards

Hadley supports the delivery of high-quality developments which are well-designed and promote health and wellbeing of communities. Hadley agrees with the changes made in response to earlier comments regarding the flexibility to the location of plant equipment and retention of architects. With these changes, the policy is less prescriptive and enables a design-led approach to optimise use of land.

Policy D2: Public realm net gain

Hadley supports the requirement for major residential developments to make positive qualitative contributions to the public realm and the criteria setting out how this can be done. Hadley's plans for the IQLN site incorporate public realm improvements that will maximise use of the site and help to deliver its sustainable development goals.

Hadley agrees with the removal of the requirement for allocated sites to deliver additional public realm beyond allocation requirements as this provides certainty about requirements and enables flexibility for site specific factors.

Policy D3: Design-led site capacity optimisation

Hadley supports the design-led approach to designing new residential development. However, it is objects to the use of "moderate" in part 5 of the policy in describing the uplift in density, which remains in the policy despite concerns raised previously. Hadley reiterates that the proposed "moderate" wording should be removed as it is subjective and inconsistent with the London Plan which requires a design-led approach to optimising the use of land.

Policy D4: Tall Buildings

Further to our Regulation 18 representations, Hadley supports the changes made to extend the 100m zone to cover the whole IQL North site as part of TBZ19: Stratford Central. This will allow the comprehensive development of the site, making suitable contributions to optimising use of land in the Metropolitan Centre.

Hadley is disappointed that other suggested amendments to Policy D4 in our Regulation 18 representations have not been incorporated and the policy continues to prevent tall buildings being located outside of areas designated as 'Tall Building Zones'. As noted in LBN's response, there may be circumstances where through detailed townscape and impact assessments, a development that complies with Policy D9 of the London Plan and located outside a Tall Building Zone could be acceptable if it is demonstrated that the impact on townscape is acceptable and the public benefits delivered would outweigh any potential harm to the townscape. Hadley suggests that this wording should be added to the policy to outline how tall buildings may be acceptable outside of the Tall Building Zones where they are demonstrated to be high quality, deliver public benefits and comply with the development plan as a whole.

Hadley further reiterates that Table 1 should be worded more flexibly and amended to replace "Height Range Maximum" with "**Indicative** Height Range". While recognising the characterisation studies that have derived the maximum heights in these areas, the design-led approach to tall buildings means proposals are required to go through detailed townscape and visual impact analysis which results in more appropriate site-specific heights and building design.

Hadley is disappointed that requests to increase the indicative 100m zone to 120m for IQLN have not been included within TBZ19: Stratford Central in the latest DSLP. The proposed development at IQLN has been through extensive design development in discussions with the LLDC Planning Officers and Quality Review Panel to ensure a high- quality scheme that responds to its context has been proposed. This live application (ref: 23/00441/FUL) has been through consultation with key statutory stakeholders (including LBN) who are supportive of the proposed heights in this location.

In addition, the approved Stratford City Outline Planning Permission (ref:10/90641/EXTODA) sets out maximum height parameters that identify part of the IQLN site for buildings up to 120m AOD. The parameter plans for this outline consent included the wider Legacy Communities Scheme and provide continuity with the rest of the development in the area. Therefore, Hadley would like to reiterate its request for the 100m zone to be increased to 120m for IQLN to be in line with the outline planning permission and the live planning application and extensive pre-application discussions.

In respect of RRW, Tall Building Zone TBZ18: Stratford High Street sets out the height for Site Allocation N8.SA7 Rick Roberts Way. This states there are opportunities to include limited tall building elements up to a maximum height of 50m (c.16 storeys), with a prevailing height of above 21m and below 32m (c. 7-10 storeys). By way of context Stratford High Street is defined by a series of tall buildings interspersed with low-rise developments.

Hadley objects to the maximum height of 50m and recommends an indicative height of 75m for RRW.

Hadley has been in pre-application discussions with LLDC regarding emerging proposals for the RRW site, following a design led approach that optimises the capacity of the site and maximises the delivery of affordable housing. The emerging proposals include a taller element on the High Street, such that Hadley requests that the indicative height in TBZ18 should be increased in this location.

The development will play an important role in highlighting the importance of the Greenway junction with Stratford High Street at a townscape level. The emerging proposals provide an opportunity to deliver circa 70% affordable homes, helping to realise LBN's shared ambitions for the delivery of affordable housing.

As explained above, the Local Plan should propose indicative heights so that each site should be assessed through a design led approach and allow for taller elements having regard to design, townscape, heritage and visual impact assessments.

High Streets

HS2: Managing new and existing Town and Local Centres

Hadley agrees with the changes made following previous comments to reduce the amount of affordable Class E floorspace in town centres providing more than 1,000sqm GIA Class E floorspace from 20% to 10% as this is in line with common practice and would not be a barrier to development.

Hadley is supportive of policy that encourages meanwhile uses on vacant sites and agrees with changes made following earlier comments on the requirements for a Vacancy Prevention Strategy for Use Class E floorspace over 1,000sqm in town centres. The supporting text setting out the requirements for this document enable more flexibility to the process of marketing vacant units for temporary units and enable the strategy to reflect the uncertainties that could cause vacant units due to changes in market demand and the current economic climate.

Policy HS5: Visitor Evening and Night Time Economy

Hadley is encouraged by the aim for Stratford Metropolitan Town Centre's night-time economy is recognised to be of regional significance, with support for culture, creative industries, leisure and a strong student base. This is supportive of Hadley's aims for the development of the sites.

Hadley agrees with the changes made in response to the Regulation 18 consultation to allow more flexibility to the location of specialist food markets, restaurants and cafes, in line with the NPPF and in context of Use Class E.

Community facilities

Policy SI2: New and re-provided community facilities

Hadley is encouraged by the support for new community facilities over 1,000sqm GIA in town centre locations. Hadley objects to paragraph 4 of the proposed policy which states that speculative social infrastructure development will not be supported and requests flexibility as the local community grows with the large growth of development in the area.

Inclusive Economy

Policy J4: Delivering Community Wealth Building and Inclusive Growth

Hadley is supportive of the ambition to provide employment for local residents and seeks to employ local talent where possible. However, Hadley maintains its stance set out in the Regulation 18 representations which sought to remove the local jobs tariff. Hadley strongly feels that on-site provision should be preferred over a financial contribution. Any policy requirement for local labour should seek to secure jobs or require a financial contribution where jobs are not secured on site.

Hadley is disappointed that the requirement for 35% construction phase and 50% end user phase jobs to be secured through local employment has not been reduced or removed. Whilst the ambition is recognised, a lower proportion would be considered proportionate and appropriate. Hadley believes that further justification is required as to why Policy J4 proposes a much higher percentage than standard, and if the requirement is not reduced the policy should include flexibility in its application to reflect the circumstances of each development. This high proportion of end user phase may discourage companies working in the borough if they cannot attract the skills and employment to suit their business. Surrounding boroughs such as LB Hackney and LB Tower Hamlets require 25% and 20% local labour, which would be more appropriate.

Homes

Policy H3: Affordable housing

Hadley recognises the need to provide affordable housing in the borough that supports the needs of Newham's residents. Hadley strongly supports the use of the threshold approach as set out in the London Plan in determining the level of affordable housing required for a site. However, the proposed requirement for sites to provide 50% of the total residential units as social rent and 10% as affordable home ownership might not always be the most appropriate mix for all sites in the Borough. The proposed mix of affordable housing tenure in any development proposal also needs to reflect the GLA affordable housing grant funding

programmes, providing flexibility to ensure that homes are to be feasibly delivered. Therefore, Hadley suggests incorporating greater flexibility in the policy to allow for market demand changes and a greater chance of developments being able to deliver affordable housing.

Flexibility of tenure mix should be granted to all schemes that can demonstrate the socio-economic and viability rationale for proposing an alternative tenure mix, particularly if that allows the provision of a size mix that fulfils identified needs.

Policy H4: Housing mix

Hadley recognises the need to provide a housing mix that supports the assessed need in the Borough. However, Hadley also recognises that different parts of the Borough may have different needs and suggest that policy should provide an element of flexibility to allow sites to reflect neighbourhood specific requirements.

Part 2 states that *“new residential developments on individual sites with the capacity to deliver ten dwellinghouses (C3) or more should deliver 40% of the number of new residential units as family dwelling houses (C3) with three or more bedrooms. Developments that do not meet these requirements on site and the delivery of the required affordable housing under Local Plan Policy H3.1 will not be supported unless accompanied by a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered”*.

Hadley remains concerned that this will place increased financial pressure on the delivery of schemes, particularly when balancing this with the delivery of affordable housing. Development sites have a number of competing requirements that need to be balanced and there is currently a disconnect in the DSLP between the policy requirements for affordable housing and for design. The current approach to incorporate such high levels of family housing could put significant pressure on the financial viability of development and optimisation of sites. The policy should recognise the market context and sub areas across the borough and recognise the need for flexibility in the unit mix. Hadley therefore supports the approach to testing viability where less than 40% family housing is provided.

In addition, Hadley objects to the inclusion of Part 3 which states that new residential developments should provide *“a minimum of five percent of the proposed residential units as four or more bed affordable family dwelling houses (C3)”* and requests that a fallback is included for schemes that do not meet this requirement to demonstrate this through a financial viability assessment.

Hadley welcomes the incorporation of greater flexibility to the provision of studio units and one bed units to improve viability of residential schemes. Hadley is however concerned by the limit to one bed, two person units to 15% of residential units, and the limit of studios to 5% of residential units. While recognising the housing need within Newham for family sized housing, Hadley notes that these one bed units often help improve the viability and deliverability of residential schemes, supporting the delivery of the required family housing. Therefore, Hadley requests that the proportion of one bed and studio units within a residential scheme should be increased.

Policy H5: Build to Rent Housing

Hadley notes the criteria set out for developments to qualify as Build to Rent and acknowledges the requirement for Build to Rent housing as a block or phase within a larger development should deliver

affordable housing. The DSLP sets out a requirement for 65% London Affordable Rent and 35% equivalent to London Living Rent.

Build to Rent housing can face different viability constraints as value is not realised until later in the development. London Plan Policy H11 sets out that the affordable housing offer within Build to Rent schemes can be solely discounted market rent. The DSLP should be in line with the London Plan and should delete reference to Policy H3.

Policy H8: Purpose-built student accommodation (PBSA)

Whilst Hadley supports the requirement for new PBSA to be located in a Town Centre location with a minimum PTAL 4, it is considered inappropriate to limit the provision on new PBSA in the Stratford and Maryland neighbourhood if it is solely providing a replacement facility with no net increase in bed spaces within or adjacent to an existing campus development in the neighbourhood.

As clearly stated in Policy H.4: Providing student accommodation of the LLDC Local Plan, provision of PBSA should “*be directed to appropriate locations within or on the edge of the Metropolitan Centre*”. Stratford Town Centre is the most sustainable location for PBSA in the borough, so the DSLP should not seek to prevent the provision of new PBSA in the neighbourhood. Hadley is disappointed that the concerns raised regarding the restrictive nature of PBSA development in the Stratford and Maryland neighbourhood have not resulted in changes to the proposed wording of this policy. IQLN is proposed to deliver a balanced mix of PBSA and residential uses across the site, reflecting evidenced demand and an appropriate mix for its location. Hadley therefore suggests that at a minimum, PBSA in this location should be supported where it is delivered alongside and supports the delivery of housing.

While it is recognised that the policy now allows delivery of PBSA in the neighbourhood where it is within or adjacent to an existing campus development, this is not flexible enough to meet the needs of universities in the area that are unable to provide the necessary accommodation for their students within or adjacent to their existing campus. PBSA in an accessible location that is a short journey by walking, cycling or public transport to existing campuses should be supported as suitable locations for PBSA, particularly where this is located closer to amenities than the campus.

Hadley agrees with the changes to nominations agreements with higher education providers to not have to be located in Newham. This approach is more consistent with Policy H15 of the London Plan and better reflects the sustainability and accessibility of Newham’s town centres as suitable locations for London’s students to live in. However, the requirement to secure all bedrooms within a development in ‘areas of over-saturation’ through a nomination agreement is not supported. This is not in line with the London Plan and does not reflect how some students would prefer to live with people from different universities or in different locations.

Policy H11: Housing design quality

Hadley is again supportive of the inclusion of housing design requirements to ensure well-designed homes for Newham residents, that seek to promote the health and well-being of residents. Hadley agrees with changes made to Policy H11 in response to earlier comments to remove overly prescriptive and potentially onerous design requirements for planning applications.

Hadley recognises the need to maximise the number of dual aspect homes but requests more flexibility in the policy requiring all three or more bedroom dwellings to be dual aspect and limiting single-aspect dwellinghouses. Due to changing regulations, it may not always be possible to provide that all family homes or residential units in general have dual aspect. Enhanced aspect homes should be supported where it can be demonstrated that an exceptional living quality is provided and dual aspect has been maximised across the scheme.

Hadley objects to the requirement to *“locate any ground floor private amenity spaces away from street-facing facades”*. This does not consider sites which are bounded by the street on all sides, or how planting and other mitigation measures can be used to protect these places from potential street impacts. This policy is also considered too prescriptive as this could then apply to quiet streets which seems to negate the objective of the policy.

Green and Water Spaces

Policy GWS1: Green spaces

Hadley continues to support LBN’s ambition to deliver a network of high-quality green spaces and will provide 10,000sqm of new public realm as part of the IQLN development. However, Hadley is disappointed that LBN has not amended the policy requiring new open space functioning as a local park to be transferred to the Council’s ownership. Although it is noted that the policy provides for a management plan to be secured where it is agreed that the transfer of ownership is not to happen, Hadley continues to be concerned by the onus put on transferring ownership to the Council. The ability to transfer land ownership should be an option rather than automatic and should be agreed on a site-by-site basis. It is beneficial for developers to carry out estate management of larger schemes to support placemaking and ensuring open spaces are kept secure and safe for residents. The policy should make clearer that transfer of land ownership is an option. The current wording does not provide clarity on when it would be agreed that transfer of land ownership would not be required and prioritises the transfer of land ownership. Hadley requests that the wording is amended to make clear that this is an option rather than automatic.

Policy GWS3: Biodiversity, urban greening, and access to nature

Hadley is supportive of updates to the policy following earlier comments for the Urban Greening Factor to now be in-line with the London Plan requirements.

Climate Emergency

Policy CE2: Zero Carbon Development

Hadley supports the vision to reduce emissions in the whole life cycle of a building and for the principle of net zero design and construction. However, the policy imposes very onerous requirements, such as that no new developments should be connected to the gas grid.

Hadley re-iterates its earlier comments suggesting that the wording of Part 5 should be amended to *“new developments that have the capacity to, should generate renewable energy on site and should not be connected to the gas grid”* have not been incorporated. A number of sites in Stratford, including IQLN, have a legal requirement to connect to the existing District Heating Network. It is noted that the supporting text provides that connections to existing heat networks will only be permitted where a fully funded

decarbonisation plan will be implemented within the lifetime of the plan has been agreed. While this is supported, it should be noted that developers do not have control over the District Heating Network and its decarbonisation and this requirement may delay development coming forward.

CE3: Embodied Carbon

Hadley objects to the policy and reiterates that policy should be amended to require whole life cycle carbon assessments for GLA referable schemes in accordance with the London Plan, rather than all major developments.

Transport

Policy T3: Transport Behaviour Change

Hadley reiterates that the provision of Electric Vehicle Charging Points should be in line with the London Plan rather than going beyond the requirements as set out in Part 5b which requires 100% of residential spaces rather than 20%.

Part 5c requires major development with zero car parking on site to provide contributions to Electric Vehicle Charging Points elsewhere in the borough. While Hadley does not have an issue with the principle of major developments with zero onsite car parking providing contributions to Electric Vehicle Charging Points elsewhere in the borough, the location of such charging points should be agreed with the Applicant in the vicinity of the proposed development to ensure those benefit future residents.

Neighbourhoods

Neighbourhood N8: Stratford and Maryland

Hadley welcomes LBN's revisions to the vision that support the evolution of Stratford Town Centre into an International Town Centre. This directly addresses Hadley's previous comments and aligns with our view that Stratford has the potential to become an International Centre on par with London's central centres.

Hadley notes LBN's clarification regarding the application of Policy N8 and the evidence base in the form of the Newham Characterisation Study. However, we believe the policy's continued use of "moderate" uplift in density remains inadequate for Stratford Town Centre, particularly given it is located within the Olympic Legacy Opportunity Area, it is identified potential as an International Centre and the evolving national policy landscape.

We urge the Council to reconsider this approach in light of the following:

- Existing Planning Context: A planning application for the IQLN site, which has undergone multiple design review panels, demonstrates the viability of heights beyond those stipulated in the current policy. These heights have been deemed appropriate and sensitive to the surrounding context.
- NPPF Consultation: The ongoing NPPF consultation proposes a significant shift towards promoting an uplift in density in urban areas and strengthening expectations for approvals on brownfield land. This aligns with the Government's objective to optimise land use and address housing needs.

- International Centre Designation: The aspiration for Stratford Town Centre to become an International Centre necessitates a more ambitious approach to density. Benchmarking against other International Centres demonstrates that "moderate" uplift is insufficient to accommodate the scale of development required.

Therefore, we propose removing the word "moderate" from Policy N8 or replacing it with "appropriate" to allow for a more context-sensitive and ambitious approach to density. This would ensure consistency with the NPPF, acknowledge the site-specific context established through the planning application process, and enable Stratford Town Centre to fulfil its potential as an International Centre.

Hadley welcomes the Council's support for the inclusion of development sites in the N8 neighbourhood and the emphasis on night-time activities and mixed-use development in Stratford Metropolitan Town Centre. We believe these elements are crucial to enhancing Stratford's status as a potential international centre.

We also support the provision of new small-scale employment floorspace to support a 15-minute network of employment uses, aligning with our plans for workspace at IQLN. The principle of maximising opportunities for new public realm while optimising land use and improving walking and cycling routes is also welcomed.

Regarding the Council's proposed insertion regarding street trees, Hadley suggests revising the text to state: *"the use of street trees, particularly at Victory Park and on Penny Brookes Street, Water Lane and Windmill Lane **where feasible**, and through the use of Sustainable Urban Drainage Systems, particularly on Penny Brookes Street and Windmill Lane."*

This modification clarifies that while street trees are highly valued, their implementation should consider technical feasibility and not inadvertently restrict opportunities for greening in instances where street trees may not be suitable.

Site Allocation: N8.SA5 Stratford Town Centre West

Hadley acknowledges the Council's updated approach to representing development and design principles on site allocation maps, as reflected in the revised N5.SA5 map.

However, to ensure alignment with the evolving vision for IQLN, Hadley requests a collaborative discussion with LBN's policy team. This discussion will focus on refining the N5.SA5 map to accurately reflect the agreed-upon design principles and land use allocations established through ongoing engagement with the LLDC.

Specifically, we propose incorporating the following elements, which have received positive feedback and design acceptance through the current application process:

- Employment Frontage on International Way: Reflecting the shift from Penny Brookes Street to International Way as the primary employment frontage.
- Updated Site Layout: Incorporating the agreed-upon routes through the site and the distribution of open space.

This collaborative approach will ensure the N5.SA5 map accurately represents the shared vision for IQLN and its contribution to the wider Stratford Town Centre.

Development Principles

Hadley welcomes the Council's recognition of Stratford's potential as a future International Centre within the development principles of N8.SA5. We also note the change in policy wording to include "workspace" as a suitable use within the site, aligning with our previous request and Local Plan Policy J1.

We notice, however, that the revised draft plan does not appear to address our previous request for PBSA at IQLN. We reiterate our position that the site is well-suited for PBSA and that this use aligns with the principles outlined in Policy H.4 of the LLDC Local Plan, which identifies Stratford Town Centre as a suitable location for student housing.

Furthermore, Hadley has secured support letters from higher education institutions demonstrating a clear need for student accommodation and their agreement for IQLN to fulfil this need. We urge the Council to reconsider the inclusion of PBSA within the development principles of N8.SA5 to reflect this demonstrated need and the site's suitability for this use.

Hadley notes the Council's updated language regarding open space provision within the infrastructure requirements for N8.SA5. The commitment to providing a series of pocket parks and a community garden at IQLN, with a focus on community growing opportunities, aligns with the significant investment Hadley is making in varied public realm offerings on-site, including play spaces and community gardens.

However, Hadley reiterates its previous objection to the use of IQLN as the primary location for addressing the area's open space deficiency. While it supports the provision of open space within its development, the onus should not fall largely on IQLN to rectify existing deficiencies.

Hadley is particularly concerned that the associated site allocation map has not been updated to reflect a more equitable distribution of open space provision. The map, as it stands, continues to disproportionately rely on IQLN, misrepresenting the Council's intended approach and potentially impacting the feasibility of other developments within the allocation.

Hadley urges the Council to revise the site allocation map to accurately reflect the commitment to a more distributed approach to open space provision, ensuring that the responsibility for addressing existing deficiencies is shared across the allocation area. This revised approach should also acknowledge the high-quality public spaces being provided at IQLN, as agreed with the LLDC, compliant with local and regional policy, and endorsed through multiple design review panels.

Design Principles

Building heights

Hadley appreciates the opportunity to provide further comments on the building heights proposed within N8.SA5. While we understand the Council's intention to provide guidance, we believe a more flexible approach would be beneficial for this specific site.

Our previous suggestion to consider height ranges as "indicative" rather than "maximum" within Table 1: Tall Building Zones stems from our belief that a design-led approach, sensitive to site context and architectural excellence, can lead to a more successful outcome and better support the area's potential to accommodate growth and achieve its aspirations as a Metropolitan Town Centre with international ambitions.

We believe an indicative height of 120m for N8.SA5 is more aligned with the area's characteristics and future aspirations for the following reasons:

1. Established Precedents: The approved Stratford City Outline Planning Permission (SCOPP) (ref. 07/90023/VARODA granted in February 2005 and most recently amended by application ref. 10/90641/EXTODA) demonstrates a precedent for taller structures in the vicinity.
2. Emerging Context: Several recently completed or approved developments near the site, such as Manhattan Loft Gardens (143m AOD), Plots N16 (71m AOD and 47m AOD) and N18/N19 (147.6m AOD and 132m AOD), showcase the emerging acceptance of taller buildings in this location. Likewise, the two adjacent hotels to the northwest, at 70.3m AOD and 87.9m AOD, further highlight this context.
3. NPPF Consultation: The ongoing NPPF consultation emphasizes increased density and efficient land use, particularly in urban areas which supports a more ambitious approach to building heights.
4. Design Review Process: The proposed heights at IQLN have been carefully considered and refined through multiple design review panels with the LLDC, ensuring their appropriateness and sensitivity to the surrounding context.

Site Allocation: N8.SA7 Rick Roberts Way

Development Principles

Hadley does not support the allocation for Rick Roberts Way in its current drafting. In summary, the site allocation does not reflect the site allocation in the adopted LLDC Local Plan (SA3.6 Rick Roberts Way).

The LLDC site allocation seeks a comprehensive mixed-use development of residential with education uses including the provision of a primary school and open space. This includes the minimum provision of 750 new homes across the whole site.

The DSLP allocation also does not reflect the LLDC allocation nor the discussions and activities across the whole site, which is split in ownership between LLDC, LBN and St William Homes (former gasholders). The eastern part of the site has been identified for a special educational needs school. Additionally, a planning application has been submitted for the redevelopment of the gasholders for residential development (245 dwellings) (planning application reference number 23/00457/FUL) which is pending consideration. For the remainder of the site to the northwest, LLDC sought a development partner to bring forward a minimum of 450 homes. The development partner is required to pick up the shortfall in affordable housing across the LCS portfolio, as set out in the Unilateral Undertaking for Stratford Waterfront (planning application reference 18/00470/OUT), resulting in the requirement for a very high proportion of affordable housing. LLDC has selected Hadley and it is in this capacity that it has an interest in the site allocation.

The LBN DSLP site allocation allocates the site for "*residential, employment uses, sports and recreation uses, education and open space*". In our previous representations we set out that the site should not be allocated for industrial. The DSLP has removed industrial from the list above, however, the text below still states that employment should prioritise light industrial. This should be removed alongside reference to employment.

Furthermore, the Development Principles set out that development should protect and enhance existing sports and recreation uses on the site currently. The recreational use on the site, a padel tennis club, is a

meanwhile use, granted temporary consent under application 23/00165/FUL which expires on 24 June 2025. Prior to this use, the site was used for bus storage and temporary storage.

This meanwhile use follows outline permission being granted for the site as part of the LLDC Legacy Communities Scheme. These uses should not be protected as the intention was the site is to be redeveloped for residential and a school as per the LLDC site allocation and not for sports and leisure purposes.

The requirement for open space is welcomed. However, the amount required at 1.2ha does not allow for the ambitions of the LLDC Local Plan nor the LLDC Development Agreement with Hadley to be met. Given the northern part of the site is identified for a school and a planning permission has been submitted for the redevelopment of the gasholders, this would render this requirement on the remaining portion of the site. This would result in residential development not being able to come forward as sought in the LLDC Local Plan nor the minimum 450 units required as part of the Development Agreement. It would render the development unviable.

Instead, the LBN Local Plan should be consistent with the LLDC Local Plan allocating the site for residential, education and open space. The amount of open space should not be dictated by the site allocation, rather, as per the LLDC Local Plan it should set out that proposals should include local open space and playspace. As per with IQLN, the onus for open space provision should not fall largely on RRW when the site is currently allocated for a minimum of 750 residential units.

Design Principles

As set out in response to Draft Policy DS4, Tall Buildings, Hadley objects to the wording and heights proposed within the policy and the heights set out within this site allocation. As previously discussed, the heights should be indicative to allow for a design led approach as per London Plan Policy D3 'Optimising site capacity through the design-led approach'.

The heights on the site should be guided by a site-specific masterplan which optimises the capacity of the site, taking into account the LCS affordable housing requirements and viability for this site. As per the LLDC Site Allocation at present, if tall buildings are proposed, this should be assessed against the relevant design policies. The maximum heights do not represent the extensive masterplanning and design work that has taken place to date, including five pre-application meetings and a Quality Review Panel with LLDC, and the site-specific townscape, heritage and visual impact assessments. We request that heights are indicative and additional height is allowed in this location where demonstrated to meet relevant tall building and design policy tests.

Infrastructure Requirements

Site Allocation N8.SA7 requires development to address open space deficiency *"by providing a minimum of 1.2 hectares of open space"*. As stated above, this is not in line with the LCS nor the adopted LLDC Local Plan Site Allocation. Open space and play space will be provided as part of any redevelopment proposals and will be maximised across the Site, however, this additional requirement for meeting the shortfall of open space provision should not form part of the Rick Roberts Way allocation. This should be removed from both the text and map that forms the site allocation.

The allocation requires that development provides a Special Education Needs and Disability school. The site allocation map on page 415 should be updated to confirm the position of the school on land owned by LBN.

Conclusion

In summary, Hadley broadly supports the vision of the Local Plan to deliver a fairer Newham. However, Hadley continues to be concerned by the restrictive requirements set by policies and inconsistencies with existing site allocations as set out in this letter.

Hadley is keen to continue to discuss the DSLP with policy officers and requests to be informed on the progress of the document. In the interim, if you have any queries, please contact [REDACTED] or [REDACTED]

Yours sincerely

[REDACTED]

Deloitte LLP