

Sara Chiong

From: Wright, Phil [REDACTED]
Sent: 20 September 2024 14:15
To: Local Plan
Cc: [REDACTED]
Subject: UCL East - Draft Submission Local Plan (Regulation 19) Consultation
Attachments: UCL Newham Regulation 19 Consultation - 20 September 2024.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir / Madam,

On behalf of our client, University College London, please see attached representations to the London Borough of Newham Draft Local Plan (Regulation 19) Consultation. If you have any questions about the representations or require any 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,

Phil

Phil Wright

Pronouns: he / him / his

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20 September 2024

Planning Policy Team
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Dear Sir / Madam,

London Borough of Newham Draft Local Plan – Regulation 19 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 Regulation 19 consultation. UCL welcomes the opportunity to provide comments on the content of the draft policies.

UCL is London's leading multidisciplinary university, with 16,000 staff and 50,000 students. UCL provides excellence and leadership in teaching and research, was ranked eighth in the QS World University Rankings 2024 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 graduate 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 accommodation. Together, these provide 50,000 sqm of floorspace, including 524 student accommodation rooms in One Pool Street.

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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.

An Outline Planning Application for the UCL East campus was approved by the LLDC Planning Policy and Decisions Team (PPDT) on 03 May 2018 (LLDC ref. 17/00235/OUT). The Outline Consent comprises a comprehensive, phased, mixed use development within QEOP to include academic and commercial space, student accommodation, supporting retail, and landscaping to include new accesses and car and cycle parking.

Applications for the Approval of Reserved Matters (RMAs) were later approved with regard to Marshgate Plot 1 (LLDC ref. 18/00424/REM), One Pool Street (formerly Pool Street West) (LLDC ref. 18/00425/REM) and Phase 1 Public Realm (LLDC ref. 18/00426/REM) on 29 March 2019. These RMA applications comprise Phase 1 of the development. One Pool Street was occupied in Autumn 2022. Marshgate Plot 1, which also includes a café, refectory and community and engagement uses, was opened in Autumn 2023.

The Outline Consent shows how the remainder of the student accommodation, academic uses and supporting retail not delivered as part of Phase 1 will come forward during Phase 2 and across the following outstanding development plots: Pool Street East (31,400 sqm), Marshgate Plot 2 (38,700 sqm), Plot 3 (48,300 sqm), and Plot 4 (38,200 sqm). The Outline Consent assumes construction during 2030-2034 for these later plots, but work is ongoing at UCL with regard to programming their delivery.

With the above in mind, UCL has a strong interest in any planning policy developments which occur in the QEOP and Newham area, especially with LLDC transferring its planning powers to LBN on 30 November 2024. UCL previously submitted representations in February 2023 for the Regulation 18 consultation of the LBN Draft Local Plan. On behalf of UCL, we now submit the following comments in relation to the Local Plan Regulation 19 consultation.

Draft Policies

Building a Fairer Newham

Policy BFN1: Spatial strategy

UCL is supportive of the overall aims set out in the spatial strategy. UCL is located within Neighbourhood N8 Stratford and Maryland, and UCL welcomes mention in draft Policy BFN1(1)(a)(iii) that LBN seeks to develop community and growth in Newham by "*directing significant levels of growth to...the N8 Stratford and Maryland neighbourhood*", therefore recognising the key role of the area in which UCL East is located.

The Regulation 18 version of the draft Local Plan noted at draft Policy BFN1(4) how "*development will meet the retail and leisure needs of residents, workers and visitors by...creating new Local Centres in the N8 Stratford and Maryland*" neighbourhood, in addition to other listed neighbourhoods. As noted previously,

UCL welcomed the inclusion of 'N8 Stratford and Maryland' as a listed new Local Centre, as it felt UCL East would contribute to these Local Centre aims.

UCL is therefore disappointed to see that N8 Stratford and Maryland has in the Regulation 19 version been omitted from the areas where new Local Centres will be created, as listed in BFN1(4)(c). It is considered that this feels at odds with draft Policy BFN1 (1)(a)(iii) which, as outlined above, shows support for directing significant levels of growth to this area.

Policy BFN2: Co-designed masterplanning

Draft Policy BFN2(4) states that, *"all phased sites, where parts of the site will remain vacant or underused for more than three years, must submit a Meanwhile Use Strategy which will outline how vacant and underused plots will be activated"*. UCL remains supportive of this policy aim and recognises the value in meanwhile uses in temporarily activating otherwise-vacant plots.

Since the representations submitted with respect to the Regulation 18 consultation, UCL's Interim Uses Strategy required as part of the S106 requirements for Phase 1 of the UCL East development, has been approved by LLDC on 7 July 2023 under LLDC ref. 22/00181/106. Elements of this strategy have already been implemented in the form of the City Mill Skate development, located in the north-east portion of the Pool Street East plot. In addition, it is proposed that temporary laboratory space and life sciences research facilities will utilise the southwest half of the same plot for a period of 7.5 years. These proposals are subject to a planning application which is currently being determined by LLDC (ref. 24/00313/FUL).

Design

Policy D1: Design Standards

UCL supports the aim of draft Policy D1 to achieve good quality design and a high standard of placemaking, sensitive to the surrounding context, and in the Regulation 19 amendments to the draft policy, welcomes the recognition that in applying design quality standards, some temporary developments will be in place for longer than a year. The Regulation 19 version of the draft Local Plan now effectively notes that the application of such standards will be expected for temporary development proposed for longer than three years.

However, whilst this amendment is welcomed, it is considered that the draft policy should provide greater clarity on how to approach applying relevant policy to development which is still temporary, but proposed for periods longer than three years. This would reflect the temporary consents likely to be seen at UCL East, including the aforementioned Pool Street East development, and in other examples where phased consents cover longer timescales.

UCL also considers that in referencing welcoming buildings and spaces, Policy D1 should also cite the need for development to strive towards design which meets the relevant access and inclusion requirements.

Policy D4: Tall buildings

UCL welcomes the inclusion of the UCL East site within Tall Building Zone TBZ19: Stratford Central, but has concerns relating to the consistency in which maximum supported buildings heights are referenced in draft Policy D4 and the remainder of the draft Plan.

The 'Height Range Maximum' given for Tall Building Zone TBZ19: Stratford Central on page 77 references "60m (ca. 20 storeys) and 100m (ca. 33 storeys) and 32m (ca. 10 storeys) in the defined areas". The 'further guidance' then given on the same page notes that at Stratford Waterfront, "a limited number of tall building elements of up to 100m (ca. 33 storeys) could be provided".

However, when then reviewing the 'Map of Newham's Tall Building Zones' at page 79, and its associated colour coding, it does not appear that the Stratford Waterfront area, where a maximum height of 100m is given, extends to include where UCL East is located. The UCL East site instead looks to fall within an area where the maximum height is given as 60m.

A maximum height of 60m for the UCL East site is at odds with the height parameters already consented under the UCL East Outline Consent (ref. 17/00235/OUT), which permits height of up to 72m. UCL therefore feels that the Map of Newham's Tall Buildings Zone should be amended to reflect this.

Furthermore, whilst the Regulation 18 version of draft Site Allocation N8.SA6 Stratford Waterfront South previously referenced the need to accord with "Local Plan Policy D4 and the Tall Building Zone", it is noted that the equivalent Regulation 19 Site Allocation now states that "Building heights should range between 21-32m (ca. 7-10 storeys) with taller buildings up to 60m (ca. 20 storeys)". In a manner similar to the above concerns with the Map of Newham's Tall Building Zones, the latest draft Site Allocation N8.SA6 Stratford Waterfront South, which comprises almost exclusively the UCL East development site, fails to recognise the Outline Consent which permits heights above the 60m referenced.

UCL therefore requests that both the above-mentioned map, and the draft Site Allocation, be reviewed to ensure these recognise and correctly reference the permitted heights set out in the UCL East Outline Consent, and do so consistently across the draft Local Plan.

Social Infrastructure

Policy S13: Cultural facilities and sport and recreation facilities

UCL recognises the importance of cultural facilities and sport and recreation facilities, including the role these play in promoting diversity, inclusive participation and wellbeing. UCL therefore supports the support for and protection of such facilities in draft Policy S13.

UCL has an aspiration to develop increased sporting facility provision and would be interested in working with any potential opportunities to support development of this nature near to the UCL East campus.

Homes

Policy H8: Purpose-built student accommodation

UCL welcomes the omission of the requirement for purpose-built student rooms to be secured through a nomination agreement with a Newham-based higher education provider. This had been stated in the Regulation 18 draft policy, and had been considered overly restrictive.

UCL previously objected to the manner in which draft Policy H8: Purpose-built student accommodation prevented the provision of new purpose-built student accommodation in the Stratford and Maryland neighbourhood, unless such provision replaces an existing facility and results in no net increase in bed spaces.

UCL notes that in setting out the changes made to the policy (page 85, 'Regulation 18 Consultation Report'), LBN explains that draft Policy H8 now *"explicitly support[s] delivering existing campus development expansions in the Stratford and Maryland neighbourhood"*. Whilst UCL supports the amendment of the policy in this way, it is UCL's view that the restriction for proposals elsewhere in the neighbourhood to not result in net additional bed spaces remains unnecessarily restrictive. Whilst the Regulation 19 version of the draft Local Plan includes additional detail on the number of PBSA developments in the area in recent years, to prevent any net additional capacity entirely is considered excessive. Instead, it is argued that new proposals should be subject to the usual development tests, including those set out in the remainder of draft Policy H8 and as seen in the comparable adopted LLDC Policy H.4; namely that they are accessible by sustainable transport modes and from the higher education provider(s) to which the proposals are linked.

In recognition that the draft Plan is to manage growth and development across the borough to 2038, draft Policy H8 does not allow the flexibility which may be required to accommodate demand across this period.

Climate Emergency

Policy CE1: Environmental Design and Delivery / Policy CE2: Zero Carbon Development / CE3: Embodied Carbon / CE4: Overheating / CE6: Air Quality

UCL support the aims of Draft Policies CE1, CE2, CE3, CE4, and CE6 to achieve high environmental standards in new developments, and has incorporated reduced consumption and minimised impacts into the UCL East development through the design, construction, and operational stages. Consequently, UCL has had confirmation from BRE that both of the Phase 1 buildings have achieved BREEAM Excellent.

As referenced in the UCL response to the Regulation 18 draft Local Plan, UCL understands that there is a legal requirement to connect to the district heating network (DHN), which due to the relevant DHN's performance brings additional complexities when seeking to adhere to draft Policy CE2 which states that *"new development should not use fossil fuels for heat or energy"*. The DHN's current increased carbon

factors, comprised environmental performance and reliance on fossil fuels do not align with the aspirations of the draft policy.

UCL therefore welcomes added mention in the related supporting text (paragraph 3.250) that fossil fuel heat networks are present in the borough, and that these bring challenges in meeting LBN's climate change targets. However, given the DHN's current performance has significant implications for Phase 1 of UCL East, as well in future for the plots brought forward under Phase 2 of UCL East, UCL would be grateful for the opportunity to work and discuss the implications of connecting to the DHN further with LBN. In addition, UCL requests that additional detail is given on the Park's decarbonisation scheme and its progress, and would request the opportunity to discuss further alternative or independent low carbon schemes where related targets are not being met.

Neighbourhoods

N8 Stratford and Maryland & N8.SA6 Stratford Waterfront South

UCL welcomes the continued inclusion of UCL East as a key cultural facility within the N8 Stratford and Maryland neighbourhood and note the inclusion of UCL within site allocation N8.SA6 Stratford Waterfront South.

In response to the Regulation 18 consultation, UCL noted that it saw merit in the inclusion of the 'relevant planning history' in the N8.SA6 Stratford Waterfront South, but that if including mention of the Outline Consent (ref. 17/00235/OUT) and Marshgate Plot 1 RMA (ref. 18/00424/REM), mention should also be given the RMAs for One Pool Street (ref. 18/00425/REM) and the Phase 1 Public Realm (ref. 18/00426/REM). It was felt that given the role these consents have played in already transforming the site allocation, and in particular the Outline Consent which will continue to shape development within Phase 2 of the new campus, mention in the allocation was sensible.

UCL is disappointed to see that in the Regulation 19 version of the draft Local Plan, mention of the relevant planning history has been omitted in its entirety. UCL considers that at the very least, mention should be given to the extant Outline Consent (ref. 17/00235/OUT) for the reasons as given above.

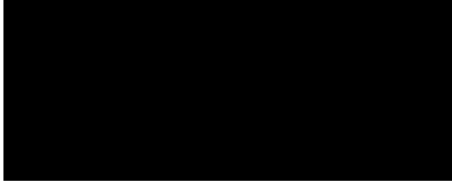
In addition, and as set out previously, UCL feels that the N8.SA6 Stratford Waterfront South Site Allocation should reference and reflect the maximum height as permitted by the UCL East Outline Consent.

Conclusion

In summary, UCL is largely supportive of the principles set out in the Regulation 19 consultation document of the draft Newham Local Plan, but has some concerns where draft policy remains unchanged in response to previous comments or where some provisions have been omitted from the Regulation 19 draft Local Plan. On behalf of our client, we would be grateful for the opportunity to work further with LBN to help shape forthcoming planning policy. We therefore request to be kept informed of in the preparation and examination of the Local Plan.

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

Yours faithfully



Deloitte LLP