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Good Afternoon,

Please see attached our Regulation 19 Representations to Newham's draft Local Plan, on behalf of RAD CHP Ltd.

Kind Regards,

Rachel

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Submitted via email only: localplan@newham.gov.uk

Representations to Newham Draft Submission Local Plan (Regulation 19)

Introduction

CBRE act for RAD CHP Ltd., who are long leaseholders of the 'Phase 1' land within the Royal Albert Dock (RAD) redevelopment site.

RAD is within the Royal Docks and Beckton Riverside Opportunity Area, one of the largest regeneration areas in London, undergoing significant transformation. It is also within London's only Enterprise Zone, as strategically important land owned by the Mayor of London.

Currently, RAD Phase 1 comprises five largely vacant office buildings (totalling 477,000 sq. ft NIA) with ground floor retail/mixed uses, that were completed as first phase of a wider masterplan which secured planning permission under Hybrid Permission ref: 14/00618/OUT in December 2015.

RAD CHP Ltd. is introducing alternative uses to reinvigorate the site, which has been unsuccessful as an office business park. The primary objective of RAD CHP Ltd. is to ensure occupation of the existing high-quality, yet largely vacant buildings which were completed as Phase 1 of the Hybrid Permission, to kickstart the transformation of this wider 29.8 hectare strategic site (Royal Albert North - N3.SA1).

Extensive pre-application discussions with the Local Planning Authority (LPA) and engagement with the GLA Royal Docks team have taken place regarding RAD CHP's repurposing/masterplan vision and the series of change of use planning applications that have been submitted to date, as set out in Table 1 below.

Application	Status
Change of Use to Purpose-Built Student Accommodation (Sui Generis) Lascars Avenue WEST and Royal Albert Quay WEST LPA ref: 24/00440/FUL	Resolution to Grant June 2024; S106 stage prior to issue of Decision. Construction to commence Q4 2024; occupation September 2026
Change of Use to Urban Winery (restricted B2 use) TEC Building LPA ref. 24/01402/FUL	Approved – Decision Notice issued 20 th September 2024.
Change of Use to Education (F.1 use) for Higher Education Altitude Building (14,335 sq.m GIA) LPA ref. 24/01570/FUL	Due to be determined October 2024.

RAD CHP Ltd.'s vision is to create a new educational campus at RAD. Newham's planning committee unanimously approved 628 student bedspaces across two of the buildings in June 2024 (LPA ref. 24/00440/FUL). There is now a live planning application for Altitude to become a University building (LPA



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ref. 24/01570/FUL). The Higher Education Institution occupying Altitude will be classed as a 'Newham-Based Institution' and will result in RAD being classed as a 'Newham-based campus'.

The applications combined will inject creativity, community and economic activity into RAD, kickstarting its transformation into a vibrant place for all. The proposals will act as a catalyst for further development and bring a critical mass of people and activity, with targeted first student occupation in September 2026.

The GLA is the freeholder of the site and the wider Royal Albert Dock masterplan site and [has outlined a vision](#) to transform RAD into a new mixed-use employment hub. Potential uses include: light industrial, workspace, education, logistics, sport and leisure uses, alongside a variety of affordable and private residential accommodation, which includes PBSA.

Comments

RAD CHP Ltd. is submitting representations to the third consultation on the emerging new Local Plan as landowner of a strategic site and as an investor, committed to the future borough. These representations have been discussed with the GLA Royal Docks team.

Vision and Objectives

It is acknowledged within the Regulation 19 Local Plan Vision Statement that change will be “radical” in certain parts of Newham, specifically Royal Docks, which, once an isolated industrial site, will become a connected and lively location. The strategic site is identified specifically as a “transform” area where significant growth is directed, which is strongly supported.

RAD CHP Ltd. are of the view (based on their experience in seeking occupiers for the largely vacant existing buildings at RAD) that flexibility in land use is essential, with a non-restrictive approach to enabling the best alternative uses to achieve occupancy and activity at the Royal Docks.

The draft Local Plan emphasises the importance of young people to Newham's future, stating “young people in particular will be welcomed and planned for, ensuring they retain an enduring stake in their future and the borough's”. RAD CHP Ltd. fully support this statement, and this part of the Plan's vision fully reflects their own vision to create quality accommodation and teaching space for young people to thrive.

The proposals at RAD respond to Objective 5, delivering homes to meet the diverse needs of the population; and Objective 6, supporting young people to have the best start in life and reach their potential.

Draft Policy BFN1: Spatial Strategy and HS1: Newham's Town Centres

The Spatial Strategy (part 4) states that:

“Development will meet the retail and leisure needs of residents, workers and visitors by

- a. Directing main town centre uses to the borough's network of Metropolitan, Major, District and Local Centres and supporting their diversification and in some cases expansion; and*
- b. creating a new District Centre on N17.SA1 Beckton Riverside site allocation; and*
- c. creating new Local Centres on N2.SA3 Connaught Riverside, N2.SA4 Thameside West, N7.SA2 Twelvetreets Park and Former Bromley By Bow Gasworks, N7.SA3 Sugar House Island and N8.SA9 Pudding Mill; and*
- d. creating expanded Local Centres on N1.SA2 Rymill Street, N2.SA1 Silvertown Quays and N9.SA1 Plaistow North; and*
- e. protecting and expanding the borough's network of Neighbourhood Parades to ensure the delivery of a network of well-connected neighbourhoods”.*

During discussions with LB Newham Planning and Policy Officers, RAD CHP Ltd. has been met with significant resistance to the proposed provision of active, ground floor, public-facing Class E units within the Phase 1 buildings at RAD, despite the already consented provision as a result of the historic ABP planning hybrid permission, which permitted circa. 5,000 sq.m GEA of retail and leisure space in detail, and 10,000 sq.m GEA in outline.

There are currently very limited convenience facilities in the site vicinity, for example chemists, food/convenience stores. All exceed 15 minutes-walk from the site (and 400m catchment). Those to the south are across the marina so not accessible. **Figure 1** below shows the existing facilities available.

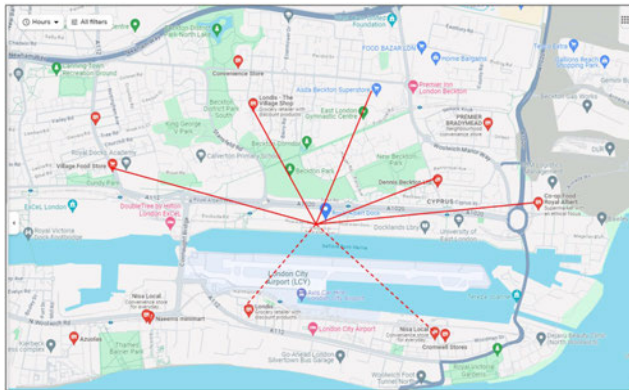


FIGURE 1 - EXISTING CONVENIENCE FACILITIES

The RAD site is not within the catchment for any designated existing District, Local or Town centre. The nearest existing designated centres to the site are East Beckton District Centre (which has an Asda, a Lidl and small comparison retail) and East Ham Manor Way Local Shopping Parade (LSP10) to the east of the Site (which contains a Fish Bar, Off Licence and Pharmacy). The site is outside of the catchment (400m) of these centres and the Shopping Parade is very limited in its offering.

The Regulation 19 Local Plan Policies Map includes a new 'Neighbourhood Parade', at the eastern edge of the RAD Phase 1 site. **Figure 2** below shows the draft Policies Map extract for the site vicinity and **Figure 3** shows the site allocation outlined in red specifically, and its proposed 'Neighbourhood Parade'.

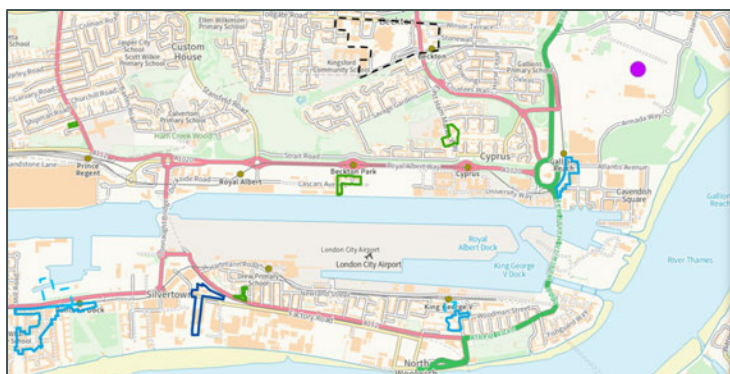


FIGURE 2 - EXTRACT OF EMERGING POLICIES MAP - TOWN, LOCAL AND NEIGHBOURHOOD CENTRES





FIGURE 3 - PROPOSED NEIGHBOURHOOD PARADE IN THE CONTEXT OF WIDER STRATEGIC SITE ALLOCATION

Whilst RAD CHP Ltd. support the modest new ‘Neighbourhood Parade’ that is proposed, this alone will not meet the need of the future population intended to occupy this strategic, opportunity area site. It is not proportionate to the quantum of residential and commercial development intended to come forward on the RAD site and wider allocation, which is linear and extends a significant way westwards (beyond 400m).

There is potential for almost 2,000 workers under office employment densities for the existing eastern linear blocks within Phase 1 alone (alongside the 628 student rooms with Resolution to Grant).

If the Neighbourhood Parade is the only portion of the strategic site specifically designated for town centre uses, it needs to be recognised and clearly expressed within the emerging Site Allocation that whilst this parade is a focus, town centre uses will not be precluded across the wider allocation and a masterplan-led approach will be taken to the mix of land uses.

Draft Policy HS1 states that “all homes” in Newham should be within a maximum 400m radius of at least one designated centre or parade, or be within a 15 minute walking distance of at least two designated centres or parades. This statement substantiates the need for a masterplan-led approach to provision of retail, services and community uses at RAD, beyond the proposed designated Neighbourhood Parade, provided they are demonstrated to not result in significant impact on existing trade draw patterns.

The completed RAD Phase 1 development and the wider future masterplan requires an element of retail, restaurants and other such uses to create a successful place with facilities that can serve the future residents, students and workers on the site as well as the wider surrounding area where there is a gap in provision. There will be opportunities for such facilities to open out into the public realm and along the waterside and this should be utilized and encouraged within the completed development and the future masterplan. Limiting the ground floor active uses to the envisaged Neighbourhood Parade would be detrimental to achieving the masterplan objectives and creating a sense of place across the wider site.

We therefore consider that as drafted, this element of the emerging Local Plan is **unsound**, and **unjustified**. We cannot see a sufficient evidence base to justify the scale of the Neighbourhood Parade or its location in the strategic site. If policy officers continue to resist any active ground floor uses outside of the Neighbourhood Parade, the convenience needs of the incoming population will be unmet.

Draft Policy BFN1: Spatial Strategy & BFN2: Co-designed masterplanning

Both draft Policy BFN1 and BFN2 reference meanwhile uses, and their ability to activate strategic sites where development will be delivered over several years and phases.

The ambition to secure long-term social value by supporting job-creation for, and training of, the local community is strongly supported. RAD CHP Ltd. is currently utilising part of a largely vacant building known as ‘Block 8B / Royal Albert Quay EAST’ for apprenticeship training as part of the contractor’s construction academy programme, which has been strongly supported by Our Newham Work as the Council’s employment and skills-building initiative.

RAD CHP Ltd. has acted quickly to secure planning permission for PBSA on the strategic site (submission of planning application in February 2024, and Resolution to Grant at Planning Committee on 18 June 2024

– LPA ref. 24/00440/FUL), and is currently seeking two further permissions to enable business and education occupiers as part of the vision to create a new Educational Campus.

RAD CHP Ltd. strongly support the emerging policy position referenced in BFN2, 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. Outside of Phase 1, the wider strategic site will require effective meanwhile uses to bring activity and economic vibrancy ahead of full redevelopment and occupancy, which is 10+ years in the future.

The principle of ‘post occupancy surveys’ being required for all developments on site allocations, as referenced in BNF2 is generally supported, however the specifics of this requirement and how it would function in practicality are currently lacking detail in the supporting text and further information on this emerging requirement is required for developers to understand the scope of the information they would be required to collect and share.

Draft Policy HS8: Visitor Accommodation

Draft Policy HS8 confirms that hotels and other forms of visitor accommodation will be supported on sites within 15 minutes walking distance to the ExCel conference centre (as well as town and local centres).

The fact the emerging Local Plan recognises the role of the ExCel conference centre as a widely recognised conference centre is supported, and it is supported that the plan therefore states that applications for visitor accommodation within the specified isochrone catchment of the ExCel centre are supported in principle.

However, there needs to be an element of flexibility to the application of the policy in relation to walking time to Excel so the policy is not applied in such a blunt way that 15 minutes walking distance to Excel would be acceptable but 16 minutes would require significantly more justification. This policy should be applied in a pragmatic manner.

Draft Policy SI4: Education and childcare facilities

Draft Policy SI4 states that new higher education facilities will be directed to, and supported in, Newham’s designated town centres or where it can be demonstrated that development is required to improve an existing out of centre campus site.

We consider this statement to be overly limiting, and given the active engagement with the Council on creation of a new educational campus at RAD, the Royal Albert North strategic site allocation should be specifically mentioned within this policy as a site suitable for a new Higher Education campus.

Draft Policy H8: Purpose-built student accommodation

Draft Policy H8 states *“new purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:*

- a. it is located within or adjacent to an existing campus development in the borough; or*
- b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and*
- c. it will not create an over-saturation of purpose-built student accommodation; or*
- d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing or permitted campus development in the borough”.*

Newham has a rapidly growing student population with UEL increasing their number of students from 10,500 students in 2018/19 to an envisaged 30,000 students in 2028/29. There has also been a recent growth in other Newham based institutions such as UCL East (approx. 4,000 students), London College of Fashion (approx. 5,000 students), and Loughborough and Staffordshire University locating in the Borough. Further to the above, additional demand will be generated by the UTC's proposed expansion (LPA ref. 24/01280/FUL).

RAD CHP Ltd.'s vision to create a new campus development will also generate demand. As noted, there is a live planning application for change of use of the existing c.14,000 sq.m, 9-storey Altitude Building on the RAD Phase 1 site to enable it to become a university building.

Whilst there have been a number of PBSA schemes consented in the Stratford area and a resolution to grant on Plot 5 of RAD, this is reflective of the growth in students within the Borough. Students unable to access PBSA will either have to rely on their family home, or local HMOs. This puts stress on the wider housing market and private rented sector, and there has been a significant growth in rental homes being used by students in the Borough in recent years as emphasised in the Newham Strategic Housing Market Assessment (2022).

We have concerns that this policy as drafted will unduly deter PBSA development and investment in the borough, with an approach **not consistent** with neighbouring boroughs or the London Plan. The London Plan (Policy H15) emphasises that Boroughs should seek to ensure that local **and strategic need** for purpose-built student accommodation is addressed.

The current policy wording does not address strategic need across London: whilst London has a large purpose built student housing market, it does not come close to providing the amount of accommodation required to house London's students, with approximately 317,000 students having to find accommodation outside of the private and university sectors, mostly in HMOs.

The current policy wording also does not pay due respect to the London Plan's recognition that PBSA provides a valuable contribution to Borough and London-wide housing targets (at a ratio of 2.5:1).

Further detailed concerns on this draft policy are summarised below.

- We consider that the wording of part (a) of this policy needs to be clarified, in order to refer to both existing and "emerging" "planned" or "permitted" campus development in the borough.
- As currently drafted, part (d) of this policy is open to misinterpretation. It is understood that 'oversaturation' is not applicable as a consideration if the PBSA is located within or adjacent to an existing or permitted campus development in the borough, however we request the wording is clarified to confirm this point.
- The supporting text on p.233 also requires clarification when it refers to 800 student bedspaces being located within 300m of an existing or approved PBSA development resulting in oversaturation. We request the wording is made clearer to confirm that the 800 figure is bedspaces **additional to, not inclusive of**, those already approved/existing within 300m. The 800 beds also appears to be an arbitrary figure and it is not clear where this has come from and why for instance 900 or 1,000 beds within 300 metres from an existing PBSA site or approved development would be considered oversaturation, this is therefore not currently justified.
- It is also considered that there should be adequate distinction in policy between 'new build' PBSA which occupies land which could otherwise be utilised for C3 housing, and repurposing of existing buildings for PBSA (as in the case of RAD, where the existing buildings are not suitable for C3 housing and PBSA represents a sustainable form of repurposing office floorspace).

Affordable Student Accommodation

Part (3) of this policy states that new PBSA should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021, further stating that developments for PBSA 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.

The London Plan requires 35 per cent affordable student accommodation at specific rental benchmarks. The 60 per cent is **not sufficiently evidenced or justified**, and is **not consistent** with the approach taken in neighbouring boroughs or the London Plan.

The proposed 60 per cent in LBN specifically will be a significant deterrent for investors and developers. We consider this proposed policy will have the following detrimental effects:

- 1) On schemes which do deliver 60 per cent, the rents of the market homes will increase, making the non-affordable (market) bedspaces less accessible to a broad range of students.
- 2) Due to the deterrent effect and likely limited new PBSA in the borough, the market rents of existing developments serving the borough's HEIs will likely increase.
- 3) Due to the deterrent effect and likely limited stock of PBSA in the borough, the private rented sector and HMOs will continue to be utilised for student housing, occupying family-sized homes which are much-needed to provide general needs housing for people in LBN.

In relation to the third point, Newham's Strategic Housing Market Assessment (2022) outlines that the number of private households with Class N Council Tax exemptions (solely used by students) is 917 and has nearly doubled since 2011. There has been and will continue to be a rapid increase in students within Newham with UEL increasing their number of students from 10,500 students in 2018/19 to an envisaged 30,000 students in 2028/29. There has also been a recent growth in other Newham based institutions such as UCL East, London College of Fashion, Loughborough and Staffordshire University locating in the Borough. The growth of these Universities will continue to put further pressure on the private rented market and therefore sufficient PBSA is needed to support this growth in students and any further growth on the RAD site.

The supporting text to this policy, which references the standard 'Letter of Support' approach at pre-application stage, is supported and reflects London Plan Policy so should be applied uniformly to all PBSA proposals in the borough.

The supporting text's reference to a cascade mechanism for direct lets, should a nominations agreement not be secured by the point of first occupation, is supported and should be applied uniformly to all PBSA proposals in the borough. This confirms that the following hierarchy will be applied:

- full-time higher-education students at local Higher Education Providers (HEP) (within Newham's borough boundary).
- those at other London HEPs with good sustainable transport connections to the site.
- any other higher-education student at a London HEP campus.
- as a last resort, any other higher-education student with a need to reside in London.

N3 SA1 Royal Albert North

The RAD site is located within the N3 'Royal Albert North' Neighbourhood, within the SA1 site allocation. The 'vision' states the following, which is strongly supported and reflects the proposals of RAD CHP Ltd. in Phase 1.

"Royal Albert North will be a 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."

As drafted, the site allocation limits educational floorspace:

“Educational floorspace will only be supported where it is associated with education campuses at the University of East London and the London Design and Engineering UTC, in accordance with Local Plan Policy SI4. Development should protect and enhance existing sports and recreation facilities in accordance with Local Plan Policy SI1 and SI3”.

It should be recognised that Education uses are a key part of the masterplan vision of the RAD Phase 1 site (which has underpinned the resolution to grant of the PBSA scheme on Plot 5). The wording should therefore be adapted accordingly to acknowledge the incoming new campus at RAD within Altitude.

With regard to infrastructure requirements, the draft states that the wider RAD site should provide a sequence of pocket parks with a combined area of 2ha. As discussed with the Royal Docks team, we consider that a masterplan-led approach should be taken, to determine the appropriate quantum and arrangement of open space, and query the source of the 2ha figure.

It is considered that the draft allocation should acknowledge and reflect the GLA Royal Docks team development prospectus document, including its references to timeframes to delivery and phasing. Due to the long-term nature of the implementation (10 years plus), meanwhile uses should be specifically referenced, as they are not currently referenced in the draft allocation. The allocation should explicitly reference potential uses in line with the GLA vision; namely light industrial, workspace, education, logistics, sport and leisure uses, alongside a variety of affordable and private housing.

General Comments

As a general comment, the emerging Local Plan references a number of new planning application requirements, such as a ‘Public Realm Management Plan’. It is requested that for the avoidance of doubt and to avoid any delays with validation of planning applications, the Planning Applications Requirements (April 2024) is updated accordingly and published alongside the new Local Plan.

Overall, RAD CHP Ltd. support the vision for the Royal Docks area, and the clear recognition this is an area undergoing significant transformation.

Key areas for further consideration are summarised below:

- 1) Flexibility in land use for repurposing of the Phase 1 buildings is essential and should be acknowledged in the Royal Albert North site allocation, to help secure occupation of the largely vacant offices.
- 2) An overly restrictive approach to ground floor active Class E uses at Royal Albert North should be avoided and is considered unsound/unjustified. A masterplan-led approach should be taken to both retail and open space to ensure good placemaking on this strategic site.
- 3) The 60 per cent affordable student housing is considered to have detrimental knock-on effects, increasing market rents for PBSA in LBN, and putting stress on LBN’s private rented sector, and should be reviewed as it is not considered to be consistent with the approach taken in the London Plan.
- 4) The currently restrictive approach to new education uses at Royal Albert North should be reviewed, and it should be acknowledged that there is currently a live masterplan being delivered by RAD CHP Ltd. to create a new educational campus on this site.
- 5) Clarification should be provided with regard to the oversaturation of PBSA draft policy wording.
- 6) A more consistent approach should be taken to applications for PBSA, with regard to the required Letter of Support, GLA rental benchmarks, and Nominations Agreements.

RAD CHP Ltd. would welcome continued engagement on the emerging new Local Plan and continue to engage positively with LBN and the Royal Docks team on their vision to transform and overcome the challenges of sustained under-occupancy of the existing buildings at RAD.

Yours sincerely,

Olivia Russell
SENIOR PLANNER
CBRE Ltd.

FOR AND ON BEHALF OF RAD CHP LTD.