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From: Louise Morton <[REDACTED]>
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To: Local Plan
Subject: Draft Newham Local Plan: Reg 19 Representations
Attachments: Draft Newham Local Plan Reg 19 Representations by NewVlc and Newham College 16.9.24.pdf

Dear Newham Local Plan Team

On behalf of NewVlc and Newham College, please find enclosed representations on the draft Newham Local Plan.

I trust the enclosed is of assistance, but should you have any queries, please do not hesitate to contact me.

In the meantime, I would be grateful of confirmation of receipt.

Regards

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Draft Newham Local Plan Regulation 19 Consultation Representations on behalf of NewVic and Newham College

1.0 Introduction

- 1.1 Quadrant Town Planning is instructed by Newham Sixth Form College (NewVic) and Newham College London to submit representations on the Newham Local Plan Regulation 19 Submission Version.
- 1.2 The aim of these representations is to:
- Highlight the education and skills shortage in Newham
 - Focus on the role of NewVic and Newham College in meeting that need
 - Outline the vision for the College over the Plan period
 - Identify the need for policy flexibility to enable NewVic to manage its estate and respond to educational needs within the Borough
- 1.3 Accordingly, these representations seek to address the following policies:
- **Policy SI1 Existing Community Facilities and Health Facilities**
 - **Policy SI2 New and Re-provided Community Facilities and Health Facilities**
 - **Policy GWS1 Green Spaces**
 - **Site Allocation N10.SA2 Newham Sixth Form College**

2.0 NewVic and Newham College

- 2.1 Newham Sixth Form College (NewVic) is one of the largest Sixth Form Colleges in London, with some 2,400 full time students and more than 250 staff. The College focuses on the development of skilled learners and progression to higher education.
- 2.2 The College was established in 1992 with the aim of increasing opportunities for school leavers in Newham and neighbouring boroughs who opt to stay in education. It specialises in working with young people aged 16-19 progressing from year 11 at school.
- 2.3 The College has grown and developed over the past 25 years and offers a wide range of courses including A-levels, specialist pathways, levels 2 and 3 vocational programmes, foundation level and ESOL programmes. The aim is to encourage students to become skilled and successful learners and to progress to higher education, employment or training.
- 2.4 Some 70% of NewVic's students come from Newham and the College is a key provider in raising education and training levels within the Borough; in turn, improving social and economic mobility for one of the most deprived boroughs in London.
- 2.5 In spring 2024 NewVic's Ofsted rating was downgraded from 'good' to 'inadequate' and the College is currently in Supervised College Status. In November 2024 NewVic will merge with Newham

College and the new senior leadership team will put in place a strategy for addressing the inadequacies identified by Ofsted.

- 2.6 NewVic's estate has its origins in Plaistow Grammar School which was established on the site in 1928. The single storey building, known as A Block, which fronts onto Prince Regent Lane forms a large part of the footprint of the current College.



Figure 1: Aerial view of NewVic (Google Earth)

- 2.7 A range of other buildings form the campus ranging in age and condition. The most recent one being a new building on Prince Regent Lane extending to 2,400 sq m which was completed in 2017 and provides a new entrance, learning resource centre and student support services.



Figure 2: New entrance building completed in 2017

- 2.8 Other buildings at the campus, however, are not so modern and overall, the College's buildings are inefficient in the use of the land and increasingly showing both condition and functional suitability issues.

- 2.9 Historically, NewVic explored a number of estate options, including relocating to a completely new site and a phased masterplan which would seek to address the quality and functional suitability of the buildings and layout of the campus by disposing of part of the site for residential development to cross fund the improvements.
- 2.10 However, neither of these options are currently appropriate or viable and the immediate focus is for the estate to provide continuity of education provision for current students following the merger with Newham College.
- 2.11 Any future rationalisation of NewVic's campus will be underpinned by a campus wide estate strategy. It is acknowledged that the Prince Regent Lane campus has suffered from under investment – apart from the new frontage block – and there is a need to renew a number of the buildings. This will only be possible if Government funding becomes available and/or through disposal of surplus land, which may include some or all of the southern part of the campus. All receipts will be reinvested in improving the quality and functional suitability of buildings at NewVic.
- 2.12 Newham College London has campuses in East Ham (High Street), Stratford (Welfare Road) and the London City Institute of Technology in the Royal Docks which is run with Queen Mary University of London.
- 2.13 NewVic and Newham have highly complementary curriculum offers. The combined college will offer a comprehensive post-16 offer, spanning SEND and foundation learning; A Levels, T levels and vocational qualifications. Currently the two colleges educate 4,600 16-18 year old students (plus some 8,000 adult learners).
- 2.14 There is relatively little curriculum overlap between the two colleges, and where there is duplication, this either reflects growing and sustainable demand; government educational policy; or alignment to the skills agenda defined through the Local Skills Improvement Plan led by BusinessLDN, and endorsed by each of the sub-regional partnerships across the capital.
- 2.15 Newham College operates at capacity with each of the campuses (East Ham and Stratford) developed to its site boundaries. The College has an approved estates strategy which aims, initially, to deal with acute shortage of teaching space at its East Ham Campus in phase 1, with subsequent phases focused on optimising utilisation, student experience and facilities through a coherent masterplan.
- 2.16 Recent upgrades have also taken place the Stratford Campus utilising money from the Further Education Capital Transformation Fund. There will be a need for further improvements and rationalisation at both the East Ham and Stratford campuses as buildings age and in response to curriculum requirements.
- 2.17 In order to achieve this, the merged College needs an appropriate planning policy framework against which rationalisation and modernisation can be promoted.

3.0 Policy SI1 Existing Community Facilities and Health Facilities

- 3.1 **Policy SI1** seeks to protect existing community facilities including education facilities. It allows reconfiguration and relocation subject to appropriate re-provision.
- 3.2 NewVic and Newham College support the premise of the policy which aligns with the NPPF and London Plan.
- 3.3 NPPF provides a presumption in favour of sustainable development on brownfield sites in locations which are accessible by public transport. It promotes social inclusion and the need to deliver sufficient community and cultural facilities and services to meet local needs. In respect of education provision, paragraph 100 states as follows:

“To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.”

- 3.4 Strategic support for new education floorspace is contained within the London Plan, as follows:
- **Policy S3 Education and childcare facilities** and **Policy E11 Skills and opportunities for all**, both of which promote opportunities for education and training
- 3.5 This is echoed in the current Newham Local Plan which supports new and improved education and training within the Borough in order to underpin economic development in **Policies J1 Investment in the New Economy, J3 Skills and Access to Employment**, and **Policies INF8 Community Facilities and INF9 Infrastructure Delivery**.
- 3.6 There is a need for draft Policy SI1 to facilitate the improvement of new education facilities within Newham in order to meet the needs of the Borough. With population growth in the Borough anticipated to reach 400,000 by 2030, and with more than 45% of the growth being from the under 25 year age bracket, there is a critical need to ensure the Borough can provide the right amount and type of sixth form and further education provision. Being the largest provider in the Borough, NewVic is key to meeting that need.

SI1: Existing community facilities and health facilities

1. Existing facilities will be protected and should not be lost to other uses, reconfigured, reduced in size or relocated unless it can be demonstrated that the following criteria are met:
 - a. The needs of the current users of the facility, potential or future users (where the facility is not in use) are met through:
 - i. provision of a suitable on-site replacement facility; or
 - ii. a suitable off-site replacement, within the local well-connected neighbourhood of the original facility; or
 - iii. an existing local facility, within the local well-connected neighbourhood which is suitable, available and affordable; or
 - b. the existing and any other social infrastructure use is no longer required, as demonstrated by:
 - i. an assessment that the existing use is surplus to current and future needs; and
 - ii. evidence that the facility has been actively marketed for social infrastructure use for at least 12 months and it can be clearly shown there is no alternative social infrastructure use that could take on the space to meet the needs of the local neighbourhood; or
 - iii. the proposal is part of a strategy from a recognised public sector body's estates programme; and
 - c. a Social Value and Health Impact Assessment (see Local Plan Policy BFN3) is provided and demonstrates potential gains are maximised and any negative impacts can be mitigated.
2. If the loss of a facility can be demonstrated as being acceptable to the Council, then the preferred alternative use will be for the maximum viable amount of affordable housing (unless located in a Primary Shopping Area, Strategic Industrial Location or Local Industrial Location).

3.7 In this respect, new development at NewVlc and Newham College will need to meet the terms of Policy SI1. We therefore seek the following changes to the policy:

- **Criterion 1:** delete '*reconfigured*'. The reconfiguration of education floorspace should not trigger the requirements of the policy, particularly if floorspace and/or student numbers are not changing. It may be appropriate to allow a threshold of say 1,000 sq m, below which reconfiguration would not trigger the policy.
- **Criterion 1:** delete or clarify '*reduced in size*'. It is assumed this relates to floorspace, but a more appropriate definition of size would be number of students. At NewVlc, for example, due to the nature of specialist spaces, some parts of the campus are under utilised. Such buildings could be rationalised or demolished without impacting on student numbers.
- **Criterion 1 b ii:** the requirement for surplus land or buildings to be marketed for 12 months is onerous and should be either deleted – if the provider has an up to date estate strategy – or reduced to 6 months in order to ensure efficient delivery of new education facilities. A 12 month marketing campaign is unnecessary to test demand. Furthermore, removal of temporary buildings at NewVlc (BU Block and G Block) would trigger the need for marketing of these buildings, which given that they are temporary, is inappropriate.
- **Criterion 2:** the requirement that any alternative use should be '*the maximum viable amount of affordable housing*' will impact on the potential to realise a capital receipt for investment in education and may undermine the requirement to achieve mixed and balanced communities. The exclusion of other uses, employment for example, and other forms of housing, such as student housing or housing for older people example, is restrictive and does not allow a site to respond to market forces. The preference for affordable housing ignores the findings of

Newham's Strategic Housing Market Assessment, Housing for Older People Topic Paper and Employment Land Review.


4.0 Policy SI2 New and Re-provided Community and Health Facilities

- 4.1 **Policy SI2** supports the provision of new community facilities, including education facilities, subject to a number of criteria.
- 4.2 NewVic's campus is designated for education purposes on the proposals map of the Draft Local Plan and is therefore considered to be an appropriate location for new education facilities.

SI2: New and re-provided community facilities and health facilities

1. A sufficient supply of community facilities and health facilities will be achieved through:
 - a. the delivery of new community facilities on identified site allocations, subject to a needs-based assessment at the time of delivery; and
 - b. the delivery of new health facilities on identified site allocations, subject to a needs-based assessment at the time of delivery; and
 - c. the provision of new, expanded and improved community facilities and health facilities, where it is demonstrated that there is unmet demand which will not be met by any planned delivery.
2. New facilities which are either, 1,000 sqm or greater Gross Internal Area, have a user appeal beyond the local neighbourhood or are anticipated to generate a large number of trips will be supported where:
 - a. there are no unacceptable transport and highway impacts; and
 - b. it can be demonstrated that the scheme has been designed to be neighbourly; and
 - c. the proposed facility is located in a town or local centre; or
 - d. if the facility is a main town centre use, it can be demonstrated through undertaking:
 - i. a sequential test, that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period; and
 - ii. if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area it can be demonstrated through undertaking an impact assessment, that there are no significant adverse impacts.
3. New facilities which are smaller than 1,000 sqm Gross Internal Area and have a local neighbourhood user appeal can be located outside of town or local centre where:
 - a. the facility is easily accessible by walking, cycling and public transport methods for both staff and expected users of the facility; and
 - b. there are no unacceptable transport and highways impacts; and
 - c. it can be demonstrated that the scheme has been designed to be neighbourly; and
 - d. it is located in a:
 - i. Neighbourhood Parade; or
 - ii. next to a park or school; or
 - iii. in an area of identified community facility deficit; or
 - iv. it can be demonstrated through undertaking a sequential test, that there are no suitable town centre or edge-of-centre sites available, or expected to be available within a reasonable period; and
 - e. if the facility is a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300 sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no significant adverse impacts.
4. Speculative social infrastructure development will not be supported.
5. Re-provision (including modernisation and/or expansion) of a facility in an existing town or local centre will be supported on the existing site where:
 - a. there are no unacceptable transport and highways impacts; and
 - b. it can be demonstrated that the scheme has been designed to be neighbourly.
6. Re-provision (including modernisation and/or expansion) of a facility outside of an existing town or local centre will be supported on the existing site where:
 - a. it can be demonstrated it is of a similar user footfall and catchment to the existing facility; and
 - b. there are no unacceptable transport and highways impacts; and
 - c. it can be demonstrated that the scheme

<p>has been designed to be neighbourly; and</p> <p>d. if a main town centre use for a cultural use, a sport or recreation use, or a bar or pub above 300sqm Gross Internal Area, it can be demonstrated through undertaking an impact assessment, that there are no there are no significant adverse impacts.</p> <p>7. Proposals for all new and re-provided (including modernisation and/or expansion) facilities should:</p> <ol style="list-style-type: none"> a. provide a Social Value-Health Impact Assessment (see Local Plan Policy BFN3); and b. demonstrate that early consultation and co-design has been undertaken with the intended operator and users of the space; and c. make efficient and effective use of land, maximising the opportunities for shared use of facilities; and d. ensure the Gross Internal Area, facilities provided, layout and storage space meets the needs of the existing and/or intended users; and e. be visible and welcoming from the street and be designed to facilitate social f. be inclusive and accessible; and g. be designed with flexibility in mind, to allow the building to adapt to different users of the space over time; and h. demonstrate how environmental conditions and air quality have influenced the position of the facility on the site and its design. This is especially important for facilities which 	<p>are intended for children or other vulnerable users; and</p> <ol style="list-style-type: none"> i. maximise availability of their provision to the community, including during the evening and at weekends; and j. if it is a large-scale development, and where possible for smaller-scale facilities, provide free, publicly available provision of accessible toilets, baby change, Wi-Fi and drinking water facilities; and k. demonstrate that the scheme has been designed to be neighbourly. <p>8. Proposals for social infrastructure facilities will usually be:</p> <ol style="list-style-type: none"> a. secured for the specific intended use of the facility; and b. required to enter into a Community Use Agreement with the Council.
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4.3 In order to assist in the delivery of new education facilities, we recommend that the policy is amended as follows:

- **Criteria 2 and 3:** clarification should be provided that ‘*new facilities*’ means the establishment of a new community facility on a new site, not new floorspace at an existing community facility. If the latter, for example, the requirement for such new facilities to be located within a town or local centre would not support new education floorspace at NewVic, or indeed at other education establishments, such as Newham College’s Stratford Campus on Welfare Road.
- **Criteria 6 and 7:** set out matters to be taken into consideration when assessing the modernisation or expansion of a community facility and we support the approach. However, Criteria 7c and 7i which promote shared community use would need to have regard to safeguarding requirements and may not be deliverable at some education establishments.

4.4 NewVic and Newham College have an important role in delivering education and skills to young people and adults in the Borough. Subject to the above amendments, Policies SI1 and SI2 will facilitate investment in the combined College’s estate and enable the provision of modern, fit for purpose education facilities in line with the NPPF and London Plan policy.

5.0 Policy GWS1 Green Space

- 5.1 **Policy GWS1 Green Space** notates all incidental space at NewVlc as such – see extract below. This is onerous and restricts the College's ability to address its current and future educational requirements.



Figure 3: Extract from draft Proposal Map showing proposed designations at NewVlc

- Green Link [GWS 1]
- Green Space [GWS1]
- Sports Facilities in Green Space [GWS1 and SI1]
- Site Allocations

- 5.2 The definition of 'Green Space' in paragraph 106 of the NPPF is as follows:

106. The Local Green Space designation should only be used where the green space is:
- a) in reasonably close proximity to the community it serves;
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) local in character and is not an extensive tract of land.

- 5.3 In respect of NewVlc (and many other sites), it is noted that any land which does not have a building on it or is not car parking has been designated as Green Space. This is contrary to the definition contained within the NPPF, and will seriously hinder NewVlc's ability to respond to its education needs.

- 5.4 The Green Space at NewVIC - which should more appropriately be described as incidental areas of land - is not '*demonstrably special to a local community*', as it is not prominent in visual terms on Prince Regent Lane, nor is there any public access to the campus, for safeguarding reasons. The designated areas do not provide any public visual amenity as they are largely obscured from public viewpoints and could at best be described as gaps between buildings.
- 5.5 For the most part, the areas designated on the proposal map as 'Green Space' at NewVIC comprise concrete footpaths, access roads, hardstanding between buildings, courtyards, external fire escape routes and do not fall within the definition of Green Space.
- 5.6 They areas are not of significance due to '*beauty, historic significance, recreational value, tranquillity or richness of wildlife*'.
- 5.7 Furthermore, Policy GSW1 uses an '*exceptional circumstance*' test for any development on Green Space which should only be used in respect of green belt/MOL. Such a test would undermine the provision of new education floorspace at NewVIC.

6.0 Site Allocation N10.SA2 Newham Sixth Form College

- 6.1 **Site Allocation N10.SA2 Newham Sixth Form College** allocates the southern half of NewVIC's campus for residential development, reflecting NewVIC's long term Masterplan for the site which included disposal of surplus land for residential development in order to fund consolidation of the College on to the northern part of the campus in new fit for purpose education buildings.
- 6.2 However, NewVIC's Masterplan is under review following its merger with Newham College along with the estate of the combined Colleges in order to ascertain how education provision and space need can be appropriately met. A large scale disposal of land is unlikely to be the best way forward at NewVIC due to viability.
- 6.3 A more incremental approach, which focuses on retention, maintenance and remodelling is likely to be brought forward. This may include some disposal element, but not of the scale previously envisaged.
- 6.4 The site is therefore unlikely to yield the scale or quantum of residential development anticipated in N10 SA2.
- 6.5 Notwithstanding this, in order to future proof the campus, we recommend that the site allocation remains as it will provide flexibility with NewVIC's estate review and enable the College to respond to curriculum and funding requirements as part of the wider Newham College entity.

Louise Morton
Quadrant Town Planning Ltd
16th September 2024