

Sara Chiong

From: Steffan Rees <[REDACTED]>
Sent: 19 September 2024 15:56
To: Local Plan
Cc: [REDACTED]
Subject: LB Newham Draft Submission Local Plan (Regulation 19): Representations on behalf of Get Living Plc
Attachments: Response_form___Final Get Living.pdf; Get Living Representations LB Newham Reg 19 Local Plan 19.09.2024.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir/Madam,

Please find the attached representations to the LB Newham Draft Submission Local Plan (Regulation 19) on behalf of Get Living Plc.

A copy of the representations form is also attached for ease of reference (note the details of the representations are contained within the letter)

I should be grateful if you can confirm receipt by return.

Please do not hesitate to contact us if you have any queries.

Kind Regards,

Steffan



Steffan Rees
Director



Mobile: [REDACTED]
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London
W1D 3QP

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Response Form for Regulation 19 Consultation.

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|  | <p>Local Plan Publication Stage Response Form</p> | <p>Ref:</p> <p>(For official use only)</p> |
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**Name of the Local Plan to which this representation
relates:**

Newham Draft Submission
Local Plan

Privacy Notice

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.

See the [Planning Inspectorate Customer Privacy Notice](#) for details on how they keep your data safe and secure.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your rights at [Your rights – Processing personal data privacy notice – Newham Council](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@newham.gov.uk

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 | Steffan |
| Last Name | Rees |
| Job Title (where relevant) | Director |
| Organisation (where relevant) | Quod (on behalf of Get Living Plc) |
| 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:

Get Living Plc

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

Policy

BFN1, D3, D4, HS1, HS2, HS4, H1, H3, H4, H5, H8, H11, CE2, and N8.SA5

Implementation Text

Paragraph

Policies Map

Yes

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☐

No

☐

4.(2) Sound

Yes

☐

No

☒

4 (3) Complies with the
Duty to co-operate

Yes

☐

No

☐

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 accompanying letter that sets out Get Living Plc's representations in more detail.

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 accompanying letter that sets out Get Living Plc's representations in more detail.

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:

We would welcome the opportunity participate in the hearing sessions on the basis that we consider the Plan, as drafted, and as detailed in the accompanying letter, to be un-sound.

We will continue to monitor the progression of the plan, including the Submission Version to better understand whether any of Get Living Plc's comments have been incorporated.

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 6th September 2024

Our ref: Q240671
Email: [REDACTED]
Date: 19 September 2024



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

By Email

Dear Madam/Sir

London Borough of Newham – Local Plan Review – Draft Submission Local Plan Consultation (Regulation 19) – September 2024

We are instructed to submit representations on the London Borough of Newham's (LBN) Submission Draft Local Plan on behalf of Get Living Plc ("GL").

GL is the UK's leading build-to-rent ("BtR") operator of large-scale residential neighbourhoods. Get Living's portfolio comprises 4,500 homes for rent across five neighbourhoods: East Village and Elephant Central in London, One Maidenhead in Berkshire and New Maker Yards in Salford, Greater Manchester and The Filigree in Lewisham. Future neighbourhoods are planned or under construction across the UK, including London, Birmingham and Leatherhead, delivering a further 4,300 homes.

East Village is the flagship neighbourhood of GL's growing portfolio and has helped revolutionise the BtR market in the UK, providing high quality, well managed neighbourhoods. East Village comprises a large proportion of Zones 3-6 of the of the Stratford City Outline Planning Permission ("SC OPP") (ref: 10/90641/EXTODA) and represents the first phase of Olympic legacy development. The development of Zones 3-6 originally focussed on the delivery of accommodation to facilitate the Athletes' Village during the 2012 Olympic and Paralympic Games ("the 2012 Games") before being retrofitted to what is now known as the thriving East Village neighbourhood. A plan showing East Village is provided at **Appendix 1** to these representations.

Launched in 2013, East Village is now the largest residential rental scheme in the UK with 2,445 homes for rent and a further 1,352 in the pipeline.

GL also continues to partner with affordable tenure provider Triathlon Homes, which offers a further 1,379 homes (social rent and intermediate), and collectively have delivered a thriving mixed-tenure and tenure-blind community of more than 6,500 people. East Village provides a choice of buying or renting to people with a range of income level and provides 30% affordable homes across the neighbourhood as a whole. When complete, East Village will provide around 5,224 homes alongside 140,000 sq.ft of complementary non-residential floorspace.

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Spanning 67 acres, including 25 acres of mature parkland, new parks and open space, East Village is also home to over 35 (primarily) independent, retailers from cafés and restaurants to dry cleaners and a beauty salon, as well as an Ofsted “Outstanding” education campus (Chobham Academy) and, the Sir Ludwig Guttmann Health & Wellbeing Centre – one of the NHS’s largest non-hospital buildings. This is in addition to all the world-class sporting facilities of Queen Elizabeth Olympic Park (“QEOP”) on its doorstep.

The East Village community continues to grow, also supported by resident initiatives like the E20 Football Foundation and Get Living-backed programmes and events. The community space “The Hall” by the East Village Trust became a hub for community support, with the establishment of a “Community Pantry”.

The majority of East Village has been built out and occupied apart from two remaining Plots (Plots N18/N19 and N16). These benefit from permission for residential and student accommodation uses (refs: 23/00090/REM and 23/00101/FUL respectively, approved in April 2024). An application for improvements to the surrounding public realm was also approved alongside these applications (Ref. 23/00091/FUL).

These permissions are yet to be implemented but the importance of preserving the principles established by those principles should not be underestimated.

East Village is a managed estate and therefore GL have a long-term interest in the creating and sustaining a successful community. Subsequently, these representations are focussed around ensuring the emerging policy is consistent with existing consents across East Village and the long-term interest in the successful growth of the community and neighbourhood as a whole.

It is important to recognise that key planning parameters and principles have already been established (by the SC OPP and other applications), and in many cases implemented. It is crucial therefore that any Local Plan covering East Village to both reflect agreed principles, but also not introduce any impediment that may undermine those principles, which in turn could also impact on development capacity (including housing).

Representations are provided in **Appendix 2**. Overall, GL support the draft Local Plan, but raise comments in respect of the following key areas:

- **Tall Building Zones** – these do not reflect the parameters and approved heights in the existing planning permissions at East Village. In our view, this makes the plan unsound because they (i) do not reflect principles that have already established by extant permissions; (ii) they do not reflect a comprehensive height strategy that has been assessed, revised and scrutinised for this part of Stratford; and (iii) heights lower than those already consented could reduce the optimisation of site capacity (particularly housing, in a strategic opportunity area, brownfield site in a highly accessible location. We

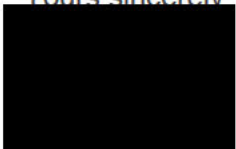


are aware that other developers with sites located within the SC OPP have raised similar concerns. Collectively, Stratford City makes a significant and substantial contribution to housing, economy, open space, play space and social infrastructure (to name a few) and we urge LB Newham to heed the developers' advice. Proposed changes do not seek an increase in principles that have already been approved. They simply state that they should be consistent – which as currently drafted, they are not;

- **Housing** – policies relating to increasing housing supply and affordable housing should be flexible and less prescriptive to allow sites to be optimised in accessible locations to meet demand and housing targets. Thresholds for affordable housing should also reflect London Plan targets. Policies relating to housing mix should also be flexible enough to respond to site characteristics;
- **Town Centres** – planning policy should be accurate with regards to town centre boundaries and flexible to support the wide range of uses that has helped make East Village a successful and attractive place to live.
- **Environment** – flexibility should be applied to policies so that it does not disproportionately affect the viability of developments nor cause delays in the planning process.

GL welcomes the opportunity to make representations at this stage of the Local Plan process and look forward to future discussions with the Planning Policy Team on later stages of the Local Plan.

Yours sincerely



Steffan Rees
Director

cc.



Appendix 1 – Map of East Village





Appendix 2 – Representations

| Policy | Representations |
|--|---|
| Part 1 | |
| BFN1: Spatial strategy | <p>Overall, GL support the spatial strategy to direct growth to well-connected areas, including Stratford (Part 1) and the principle of making the best use of land and optimising sites through a design-led approach.</p> <p>GL do however raise concerns with Part 2 of the approach which refers to Tall Building Zones as set out in Policy D4. These have been set below parameters which have been approved in recent and historic planning permissions (the recent permissions for Plot N18/19 and Plot N16 and the Stratford City Outline Planning Permission (SC OPP)). This is discussed in detail below.</p> |
| D3: Design-led site capacity optimisation | <p>East Village is an exemplar 15-minute neighbourhood in a highly accessible location with a PTAL rating of 3-6. It is the largest residential rental scheme in the UK with 2,455 homes to rent and a further 1,394 in the pipeline. As such, GL support optimising the residential capacity on highly accessible sites through a design-led approach as set out in the London Plan. GL note that to meet housing targets (as set out by Policy H1), Part 3 of Policy D3 should include allowing buildings to exceed 100m in height where the design quality can be demonstrated and particularly where existing permission exceed 100m (as outlined below).</p> |
| D4: Tall buildings | <p><u>Draft Policy</u></p> <p>Policy D4 sets maximum and prevailing heights across Stratford (Ref. TBZ19: Stratford Central). Relative to East Village, this shows a maximum height of 100m covering Plots N18/19 and a maximum height of +60m partially covering Plot N16, Plot N15, the entirety of Plot N26. A prevailing height is also set at above 21m but below 32m (7-10 storeys) for all these plots. The rest of East Village is not located within a Tall Building Zone.</p> <p>These building heights are inconsistent and at odds with the broader height strategy that has already been approved and indeed built for this part of Stratford. If this height strategy is applied in practice, it would undermine and conflict the wider height strategy in this area and could simultaneously reduce development capacity.</p> <p><u>Approved Heights at East Village</u></p> <p>As explained above, East Village is covered by the SC OPP. This is a significant permission with a lifetime of over 25 years. Key parameters (including those related to heights) have been the subject of a significant amount of assessment, review and scrutiny (with the LPA, design review panel,</p> |



design officers and plethora of other stakeholders including the highway authority, GLA etc) and detailed environmental testing (beyond that provided as evidence base to the Local Plan), which has led to a finely balanced distribution of heights across not just East Village, but Stratford City as a whole.

For example, approved Parameter Plan 7 (PP7 'Development Heights') (drawing ref: 118718/P-98-007-Rev G) (see **Appendix 3**) defines the maximum heights permissible across East Village.

This states that the maximum permissible heights for Plots N18/N19 range from +120m AOD for Plot N18, +150m AOD for the southwestern part of Plot N19, and +170m AOD for the remainder of Plot N19. The recent RMA that was approved for Plots N18/19 (Ref. 23/00090/REM) permits a building up to a maximum height of up to 148m (G+39 storeys) (extract provided at **Appendix 4**).

Plot N16 was granted permission (Ref. 23/00101/FUL) for a 18-storey building measuring approximately 71m in height with a 10-storey element to the east measuring approximately 47m in height.

The remainder of East Village has been built out and the general prevailing heights at East Village (as per the SC OPP and as built) is 10 storeys with a gradual increase in height towards the Stratford International Station with Plots N06 and N08 (both built) extending to a maximum of 30 storeys; N16 extending to a maximum of 18 storeys; Plots N18/N19 extending to 40 storeys culminating in Manhattan Loft Gardens (built) being the tallest building extending to 42 storeys.

Therefore, our concern is that the proposed approach under Policy D4 does not reflect the consented height context for East Village and is therefore unsound. The current wording does not provide flexibility for increasing height on existing buildings as it restricts tall buildings to the zones identified on the policies map. Increasing height of existing buildings can also help achieve other policy aims such as increasing housing supply in brownfield land within highly accessible locations such as East Village.

Proposed Changes

GL therefore considers the plan, in its current form, to be unsound. To ensure consistency between the proposed Tall Building Zone and the consented developments, the following refinements should be incorporated:



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| | <ul style="list-style-type: none"> ▪ Extend the maximum height to +150m for Plots N18/19 to reflect the approved consent (Ref. 23/00090/REM); ▪ Extend the maximum height to +71m, for the area covering Plot N16 to reflect the approved consent (Ref. 23/00101/FUL); ▪ Extend the Tall Building Zone and area of prevailing height to the entirety of East Village. These buildings are already built (the majority at 10-12 storeys with Plots N06 and N08 extending to a 30 storeys). |
| HS1: Newham's Town Centres Network | GL support the principles under Policy HS1 and agree with the key functions of East Village Local Centre to meet local catchment needs for retail, leisure, services and community uses. GL welcome the East Village Local Centre boundary which reflects the focus of retail activity with the exception of Plot N16 which is partially located in the Metropolitan Centre in the LLDC Local Plan. GL recommend the town centre boundaries reflect those adopted under the LLDC Policies Map but recommend the entire plot is located within the Metropolitan Centre as opposed to part of it. |
| HS2: Managing new and existing town and local centres | GL support the principles to protect existing town centres but note that some parts of this policy could be relaxed, specifically Part 4. Planning policy must be flexible to allow centres such as East Village to adapt to its resident needs and provide a range of non-residential uses that contribute to the sense of place. Restricting the subdivision of existing Class E units under Part 4 could for example restrict opportunities to attract additional or other town centre uses. The success of the non-residential units at East Village is based on a wide range of uses, which in turn supports one of the five key principles to create a 15-minute neighbourhood. |
| HS4: Markets and Events / pop-up spaces | GL welcomes the principles under Policy HS4 to support market activity and community wellbeing. The principle of a community hub to include a permanent pavilion or market/pop-up space at Victory Park in East Village was assessed and accepted under Application 23/00091/FUL. This application was approved for enhancements to key areas of public realm within East Village - Victory Park and the Belvedere. Within Victory Park, a pavilion of up to 200 sqm was approved to include a retail kiosk and café with outdoor covered seating to host a range of events to compliment the existing offer at East Village. Consideration must therefore be given to this in respect of Part 3b which requires evidence of market demand, or through temporary use testing of the concept over a period of at least 12 months. |
| H1: Meeting Housing Needs | The housing target of a net increase of between 51,425 and 53,784 units has increased from the first consultation of the draft Local Plan but it is still short of the London Plan housing targets agreed with the GLA for Newham, including a relevant proportion of the LLDC area (as set out in the Regulation 18 Report). The policy as currently worded is therefore unsound as it is not compatible with |



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| | <p>the London Plan. This is also at odds with the 2024 National Planning Policy Framework (NPPF) consultation which seeks to increase housing delivery.</p> |
| H3: Affordable Housing | <p>Part 1 seeks schemes to provide 60% of all housing units as affordable housing, with 50% of units in social rented tenure. This is a significant increase on the 35% affordable housing provision threshold (by habitable room) for the Fast Track route in London Plan Policy H5. As such, the thresholds for viability schemes and tenure mix are not consistent with the London Plan and are therefore unsound.</p> <p>Applying these challenging targets will place significant viability pressures on schemes particularly those on brownfield sites with high upfront infrastructure and build costs and complex site constraints like those in East Village. This could result in slower housing delivery which would go against the government's target to increase housing supply.</p> <p>The BNPP Viability Study supporting the draft local plan tests a range of site typologies/scenarios, all excluding infrastructure costs. This exclusion is clearly unrealistic for major developments to be able to contribute significantly to local housing delivery. The study therefore over-states the level of affordable homes which are viable.</p> <p>Notwithstanding the above, the BNPP study also clearly demonstrates that the proposed requirement for 60% affordable homes is unviable. For Build to Rent schemes only 69 (16%) of the 426 typologies tested are viable including 60% affordable homes. This number will, in reality, be substantially less when infrastructure is accounted for, meaning that under 10% of schemes will be able to viably deliver the policy. Adopting a policy requirement which is so substantially out of step with the viability evidence is contrary to planning practice guidance which notes that (Reference ID: 10-002-20190509):</p> <p><i><u>"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be</u></i></p> |



| | |
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| | <p><u><i>deliverable, without the need for further viability assessment at the decision making stage.</i></u></p> <p>GL therefore recommend the policy is amended to reflect the 35% threshold approach for affordable housing (Policy H5) and the tenure mix requirements (Policy H6). Allowing flexibility on housing mix will in turn help optimise housing delivery on highly accessible sites, such as those in East Village Local Centre.</p> |
| H4: Housing mix | <p>GL raises concerns that Parts 2-5 policy do not take account of the need to consider an appropriate mix against individual circumstances nor the different needs or characteristics of particular sites, as set out in Part 1e. For example, highly accessible areas such as Stratford could have higher demand for smaller units. Parts 2-5 should therefore be amended as boroughwide targets linked to affordable rented housing provision, where demand for family-sized units is greater. This would allow flexibility to respond to market demand, local need and site characteristics.</p> <p>As we explained above, EV revolutionised the BtR market in the UK. This means that GL has a unique insight into the live issues affecting residents and it is important that no housing type/tenure/size is discouraged through planning policy. It is important that any planning policy does not prevent different housing types from coming forward/or rule out particular size and/or tenure mixes. All forms of housing should be allowed based on a scheme-by-scheme basis as they contribute to:</p> <ul style="list-style-type: none">▪ Creating mixed and balanced communities;▪ Providing different housing types to meet different needs (e.g. entry level housing; housing for older people etc all of which give rise to very different considerations);▪ Innovation in the housing market; and▪ Allowing the housing market to respond to changing requirements. |
| H5: Build to Rent housing | <p>GL generally welcome the principles under Policy H5 but recommend suggestions to refine Policies H3 and H4 (as explained above) to ensure consistency with Policy H5.</p> <p>GL would also note that the affordable housing within H5 is described as Affordable Rent which is defined at Appendix 1 to the draft plan as housing let by local authorities or registered providers. It is assumed this is a drafting error as, in line with London Plan Policy H11 and the NPPF, affordable homes within Build to Rent can be owned and managed by the building owner (who may not be a Registered Provider). It is suggested that the affordable housing within Policy H5 be referred to as Discounted Market Rent (DMR).</p> |



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| H8: Purpose-built student accommodation | <p>GL welcome the support for new purpose-built student accommodation within Stratford. Part 1 states that new purpose-built student accommodation in Stratford will only be supported where it is located within or adjacent to an existing campus development or it is solely providing a replacement facility with no net increase in bed spaces. Should alternative proposals for student accommodation be put forward on the remaining development plots at East Village, this would hinder the delivery of new development, despite the principle of student accommodation being recently accepted and approved on Plot N16.</p> <p>As per our above comments on Policy H3, the affordable student accommodation requirement of 60% of bedrooms is unsound as the Policy H15 in the London Plan sets this at 35%. The 60% level is also not supported by the BNPP viability assessment. Policy H3 should be amended to be consistent with the London Plan.</p> <p>The need for student accommodation is on a London-wide basis as set out in the London Plan (Paragraph 4.15.2). Part 4c seeks to link nominations to adjacent institutions. This would reduce flexibility and be contrary to the London-wide need basis set out in the London Plan. Part 4c should be removed from Policy H8.</p> |
| H11: Housing Design Quality | <p>GL support the simplification of housing standard requirements but recommend referring to the adopted Housing Design Standards LPG to avoid repeating the requirements.</p> |
| CE2: Zero Carbon Development | <p>The overall approach to minimising energy is supported by GL. However, the ability for developments such as East Village to meet the specific energy related targets and policy aims is severely restricted by site constraints, land use and viability issues. Accordingly, GL recommends that flexibility is applied to the policy so that it does not disproportionately affect developments. Off-setting costs for example should be set at an affordable level.</p> <p>Clear recognition should also be made to important and competing priorities and how conflicts between those requirements can be balanced against each other. Flexibility should be applied in the policy to allow competing issues to be considered in the planning balance, but that there is also a clear direction within planning policies about how these can be resolved. Not doing so can add significant uncertainty much later in the planning process which adds risk and delay.</p> |
| Part 2 | |
| N8.SA5: Stratford Town Centre West | <p>GL support the vision for Site Allocation N8.SA5 provided that the above suggested changes to Policy D4 are taken as specific reference is made to the East Village Tall Building Zone under Part 2.</p> |

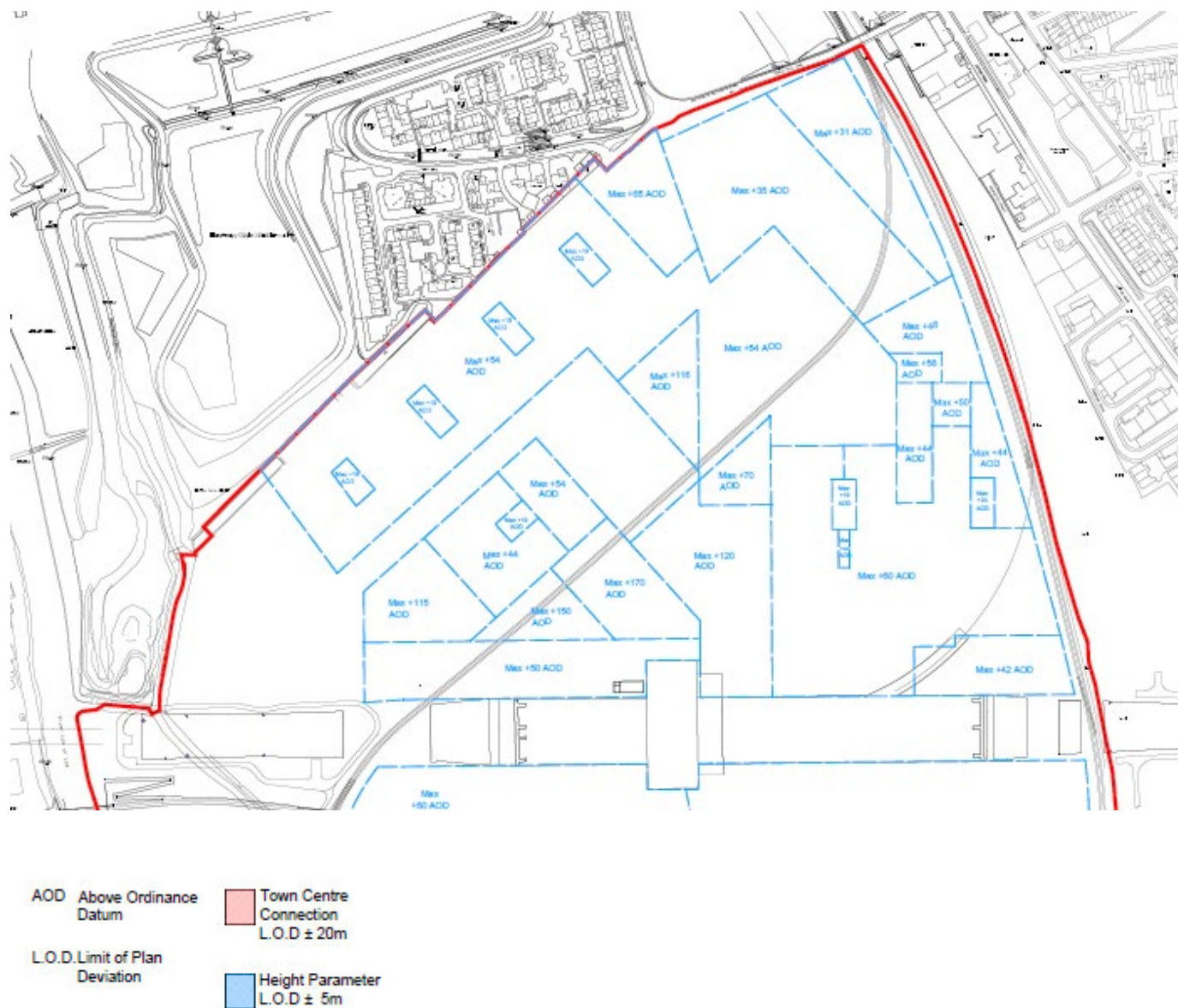


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| | <p>GL welcome Part 5 which seeks to maintain the role East Village Local Centre as a location for small scale independent retail complementary to that of Stratford, by supporting a diverse mix of uses to serve the local catchment needs for retail, services, leisure and community uses and contribute to maintaining high quality public realm.</p> |
|--|---|



Appendix 3 – Approved East Village Building Heights Strategy

Parameter Plan 7 'Development Heights' (drawing ref: 118718/P-98-007-Rev G) approved as part of the SC OPP





Appendix 4 – Illustrative details that shows the approved height strategy at East Village

