



**Quod**

---

# **Plot N16**

**Detailed Planning  
Application**

**Planning Statement**

---

FEBRUARY 2023

Q200814

# Contents

---

1	Introduction	2
2	Site and Surrounding Context	10
3	Background Context and Planning History	14
4	Consultation	21
5	Application Proposals	25
6	Planning Designations and Policy Context	34
7	Planning Considerations	43
8	Planning Obligations and Community Infrastructure Levy (CIL)	64
9	Conclusions	67

## Appendices:

Appendix 1 – Policy Note

Appendix 2 – Statement of Convergence

# 1 Introduction

---

1.1 This Planning Statement has been prepared by Quod on behalf of Stratford Village Property Holdings 1 Limited (“SVPH1”) and Stratford Village Property Holdings 2 Limited (“SVPH2”) (the “Applicant”) in support of its planning application to the London Legacy Development Corporation (LLDC) for purpose-built student accommodation (PBSA) on development Plot N16 at East Village (“the Site”).

1.2 The description of development, as set out in the accompanying planning application form states:

*“Full planning permission for the construction of a part 10-storey, part 18-storey building providing purpose-built student accommodation (Sui Generis), with commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking and other associated works”.*

1.3 A full description of the proposals is set out in more detail in the accompanying Design and Access Statement (DAS) and Section 5 of this document. In summary, however, the proposals comprise:

- A part 10-storey and part 18-storey building providing purpose-built student accommodation;
- 504 student bedrooms, with 250 (49.6%) directly let and 254 bedrooms (50.4%) subject to a Nominations Agreement with the University of the Arts London (UAL);
- 180 (36%) bedrooms provided as affordable student accommodation and all to be included under the Nominations Agreement;
- A total of 2,782m<sup>2</sup> internal amenity space comprising and 730m<sup>2</sup> of external amenity space provided as the first floor courtyard, the second floor sun terrace and the top floor roof terrace;
- A ground floor lobby with public access to areas for student and public exhibitions and a 175m<sup>2</sup> Gross External Area (GEA) café facing Liberty Bridge Road;
- A separate 170m<sup>2</sup> GEA retail/commercial unit on Celebration Avenue, with the café providing a total of 332m<sup>2</sup> GEA Use Class E floorspace;
- ‘The Ribbon’ a 690m<sup>2</sup> area of landscaped public open space focussed on Liberty Bridge Road and providing areas to rest and pedestrian routes through the Site from De Coubertin Street in the east to Victory Park to the west.
- An accessible car parking space for residents on Liberty Bridge Road and two servicing bays, with one off Liberty Bridge Road and another on De Coubertin Street.

## Application Documents

1.4 The application is supported by the following documents, the scope of which have been agreed with the LLDC in advance of the submission of this planning application:

Table 1-1 - Planning Application Documents

Planning Application Documents	
<b>Drawings for Approval</b>	
01	Site Location Plan
02	Proposed Plans
03	Proposed Elevations
<b>Drawings for Information</b>	
04	Existing Site Plan/Block Plan
05	Existing and Proposed Site Sections
06	Illustrative Bay Studies
<b>Documents for Approval</b>	
07	Design and Access Statement
<b>Documents in support of the Application</b>	
08	Acoustic Planning Report
09	Air Quality Assessment
10	Application Form
11	Arboriculture Impact Assessment
12	CIL Additional Information Form
13	Circular Economy Statement (including whole life-cycle carbon emissions assessment)
14	Construction Environmental Management Plan
15	Construction Waste Management Plan
16	Covering Letter
17	Daylight, Sunlight & Overshadowing Assessments including: <ul style="list-style-type: none"> <li>• Internal Daylight, Sunlight and Overshadowing Assessment; and</li> <li>• Impact on Neighbouring Properties Report</li> </ul>
18	Draft Heads of Terms
19	Drainage Impact Assessment
20	Ecological Appraisal and Biodiversity Statement
21	Economic Statement (explaining wider benefits of proposals)
22	Energy Statement
23	Fire Statement
24	Geo-Environmental Desk Study
25	Planning Statement (including Statement of Convergence and Draft Heads of Terms)
26	Statement of Community Involvement (SCI)
27	Student Housing Needs Study
28	Sustainability Statement
29	Townscape and Visual Assessment

30	Transport Assessment
31	Tree Survey
32	UAL Supporting Letter
33	Utilities and Services Report
34	Wind Microclimate Assessment

## Application Context

- 1.5 Plot N16 is situated within Zone 3 of the Stratford City Outline Planning Permission (SC OPP) (ref: 10/90641/EXTODA), where parameters allow for a residential-led building up to 70m AOD tall.
- 1.6 The proposed PBSA (Sui Generis) land use does not form part of the permissible land uses under the SC OPP and therefore, a new detailed planning application is proposed for the PBSA proposals. The planning strategy for Plot N16 agreed by the LLDC Planning Policy and Decisions Team (PPDT) addresses potential issues relating to overlapping consents through the submission of a suite of applications.
- 1.7 The associated applications completing the planning strategy for Plot N16 are submitted concurrently and seek to exclude Plot N16 from the SC OPP and relevant Zonal Masterplan (ZMP) as follows:
- (i) **An application pursuant to Section 96A (S96A) of the Town and Country Planning Act (TCPA) 1990 (as amended) to the SC OPP** – to ‘Slot Out’ Plot N16 from the SC OPP; and
  - (ii) **An approval of details (AOD) application** – seeking to update the Zones 3-6 Zonal Masterplan to exclude Plot N16 pursuant to Condition A1 of the SC OPP.

## Environmental Impact Assessment Screening

- 1.8 An Environmental Impact Assessment (EIA) Screening Request was submitted by the Applicant on 9 December 2022 seeking the LLDC’s opinion whether detailed planning application would need to be accompanied by an Environmental Statement (ES) carrying out an EIA.
- 1.9 On 30 January 2023 the LLDC and their environmental advisors (Arup) confirmed that an EIA was not required for the proposals.

## East Village Masterplan Approach

- 1.10 The Applicant recognises that this provides a one-off opportunity to ensure that the remaining development Plots at East Village can integrate seamlessly into the existing estate, whilst also capitalising on the opportunity to evolve East Village in response to the neighbourhood’s needs. Accordingly, the planning strategy agreed with the LLDC PPDT reflects an overarching masterplanning approach. In addition to the suite of applications outlined above, two separate applications for full planning permission and reserved matters approval (and associated

applications) are being submitted concurrently with the enclosed full planning application as follows:

- **Plot N18/19:** a new RMA, pursuant to the SC OPP for predominantly residential uses. Two separate applications are being submitted alongside this RMA: a S96A application is being submitted in support to allow the detailed proposals for Plots N18/N19 to deviate from the SC OPP in respect of development heights and housing mix; and an AOD application that seeks an update to the approved Stratford City Site Wide Housing Strategy (SWHS) pursuant to Condition C1 of the SC OPP;
- **Public Realm:** a new standalone and detailed application for enhancements to key areas of public realm, namely Victory Park and the area formerly known as the Belvedere. There is no planning requirement to make such enhancements, but this demonstrates the Applicant's commitment to ensure that the amenities at East Village evolves in response to the neighbourhood's needs whilst continuing to invest in its infrastructure.

1.11 These applications are being submitted separately, albeit concurrently, reflecting the way in which all proposals have been the subject of a comprehensive pre-application process resulting in entirely compatible proposals. The planning application boundaries are shown in Figure 1-1 below.



Figure 1-1: Plots N18/19, N16 and Public Realm Masterplan

1.12 The suite of proposals are of the highest quality and the result of a robust design development processes running concurrently that has been informed by extensive pre-application consultation with a range of stakeholders. A Social Value Statement is submitted with the Plot N18/N19 RMA and outlines several cumulative benefits that will arise from all three proposals (i.e., the RMA for Plots N18/N19 and the standalone and detailed planning applications for Plot N16 and the public realm) which includes:

- New homes that respond to the needs of local people, in particular, individuals, families and students;
- Retention of local people within East Village through expanding the provision of housing, facilitating the trend that a third of residents come from within the area.
- Increased walking and cycling opportunities;
- Improved quality and function of open space focusing on diversity of landscaping and opportunities for social cohesion and wide-ranging usage;
- Improved accessibility and legibility of the public realm which specifically responds to resident feedback that highlighted the need for more amenities and activities;
- Excellent and improved access through East Village to shops and services for health, leisure, and socialising;
- Attracts additional investment into area helping the local economy thrive;
- Excellent access to improved outdoor space to play and exercise, including community sports events as well as better security across the areas of public realm;
- Improved biodiversity, an increased urban greening factor (UGF) and biodiversity net gain through urban greening, trees, extensive planting, and community gardens; and
- Additional opportunities for cultural and creative expression and shared experience with neighbours.

## Benefits

### *On-Site Benefits*

1.13 If approved, the development will deliver a number of benefits within the Site, including:

- 504 PBSA student bedrooms, with 36% of bedrooms provided for affordable student accommodation and 51% to be secured under a Nominations Agreement with UAL as a Higher Education Provider (HEI);
- Extensive internal communal amenity and study space at first floor and the top floor of the western block and external amenity provided by level 1 courtyard, level 2 terrace, and a roof terrace;
- Public realm improvements around the Site and an increase of 325m<sup>2</sup> in the amount of open space compared the 365m<sup>2</sup> to the RMA consented in 2014, which provides public seating and amenity, as well as improved legibility from De Coubertin Street to Victory Park;
- A lobby open to the public, with ground floor spaces for student displays and exhibitions, community programming and a café;
- A UGF score of 0.34; and



- An enhanced design when compared to the RMA consented in 2014 including improvements to daylight compliance rate, the provision of external private amenity; increased cycle parking; and sustainability and energy reduction to target circular economy and zero carbon requirements set out in the London Plan (2021).

### *Wider Public Benefits*

- 1.14 The delivery of PBSA on Plot N16 will have a wider public benefit in the context of housing.
- 1.15 Firstly, the supply of PBSA in Stratford does not meet the demand so many students are restricted to renting homes in the local area. For example, students presently occupy 54% of homes at N06. The provision of PBSA at Plot N16 will provide students with the specialist housing they require, helping release conventional housing in East Village to more local people.
- 1.16 Secondly, the refined masterplan approach consolidates the remaining Zone 3 residential floorspace previously approved in the 2014 RMAs for Plots N16 and Plot N18/N19 in an optimised Plot N18/N19 RMA submitted concurrently. As a result, the new PBSA proposals for Plot N16 provide additional housing and make effective use of the highly accessible brownfield sites to maximise housing delivery.
- 1.17 The ability to accommodate additional development on Plot N16 creates a unique opportunity to provide an additional public benefit through the funding of the comprehensive enhancement of key areas of public realm in the immediate vicinity of the Site, namely Victory Park and the area formerly known as the Belvedere. A key benefit of the masterplan approach is the enhanced and linked landscaping scheme across Plots N18/19, N16 and Victory Park and the Belvedere, providing the following improvements from the existing public realm and 2014 RMAs for N16 and N18/19. Overall, the landscape masterplan proposes significant enhancements in urban greening and biodiversity across Plots N16 and N18/19 and the public realm through the introduction of a wide range of new plant species and soft landscaping.
- 1.18 The associated detailed planning application for the public realm enhancements, if approved would deliver the following planning benefits:
- **Improvements to public realm** – both the quality and function of Victory Park and the Belvedere will be significantly refined, improved, and enhanced. This will be achieved by the creation of new community spaces that inspire creativity, health, connection, and sustainable living as well as significant landscape improvements that better respond to the evolving needs of East Village residents and visitors;
  - **Improvements to legibility** – the proposals will result in physical health benefits through increased walking and cycling opportunities. Improvements to legibility and the integration with pedestrian and cycling connectivity will ensure the public realm better connects with East Village as a whole and further afield towards Stratford International Station;
  - **Improvements to accessibility** – the public realm has been designed to provide an inclusive and welcoming environment to bring together existing and new communities in the LLDC administrative and the surrounding boroughs. For example, access to the Victory Park mound will be improved significantly and include a new canopy with seating and swings that can be used by disabled users;



- **Improvement to sense of safety** – additional security is provided through the densification of landscaping and creation of more intimate spaces increasing sojourn quality and ensuring more eyes on the public realm.
- **Improvements to play space** – the proposals include new and improved access to outdoor space and play space for children of all ages with equal access for all residents and community members. Security across the play areas and distance to public toilets will also be improved;
- **The creation of a pavilion** – the introduction of a pavilion at the heart of East Village will help activate Victory Park. It will provide a retail kiosk/café with seating and flexible space to host a range of events for the local community. This will expand on the current community offer at East Village and strengthen social cohesion. The design of the pavilion is inspired by local context and will encourage local participation through community consultation, giving residents the opportunity to bring forward ideas on how it should take shape;
- **An area to provide civic space, activities, and events** – the proposals involve the creation of a “civic centre” which will help foster sense of community and local identity as it will provide opportunities for cultural uses such as an outdoor cinema, markets, exercise programmes, and performance space to be enjoyed by the whole community for people of all ages and disabilities. This specifically responds to resident feedback which specifically highlighted the need for more amenities and activities in the public spaces; and
- **Improved biodiversity** – the proposals also result in an improved biodiversity, an increased UGF and biodiversity net gain through urban greening, trees, extensive planting, and community gardens.

1.19 Importantly, these benefits are only realised upon the approval and delivery of the proposals for Plots N16 and N18/N19 in full to deliver the wider masterplan, which would allow for the investment to undertake the enhancements to the public realm.

## 2 Site and Surrounding Context

### Site Description

2.1 The Site has an area of 2,649m<sup>2</sup> and is located within East Village – an established and vibrant residential neighbourhood forming the main residential element of the wider Stratford City development. Plot N16 is located centrally within East Village on Celebration Avenue, the main north-south route through East Village. It shares a development block with Plot N17 to the south, which is built out as two hotel buildings. This context is shown in the Site Location Plan extract in Figure 2-1 below.

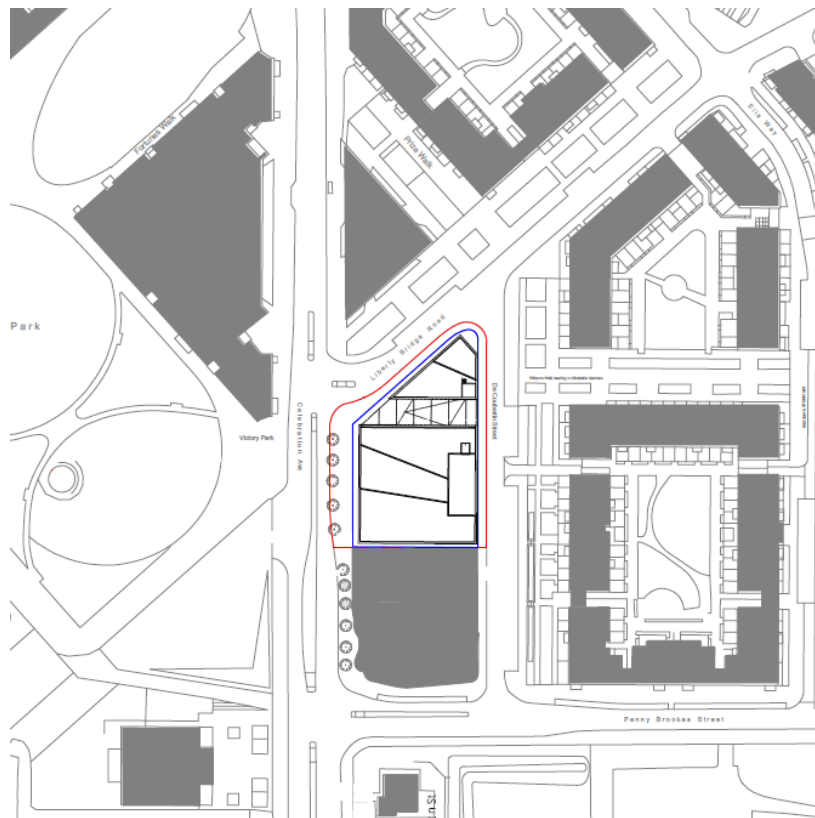


Figure 2-1: Site Location

2.2 Figure 2-2 below shows the immediate surrounding development context with:

- Plot N17 - Two adjoined hotel buildings, with the Adagio adjacent to the Site at 16-storeys rising to 70.3m AOD and the Gantry at 21-storeys rising to 87.9m AOD further south on Penny Brookes Street;
- N09 – A 12-storey (58.0m AOD) residential building located to the north of the Site across Liberty Bridge Road;
- Plot N14 and Plot N15 - Further residential buildings located to the east of De Coubertin Street, with the 9-storey (43.0m AOD) Plot N14 building and Plot N15 buildings rising to a maximum of 10-storeys (43.5m AOD).

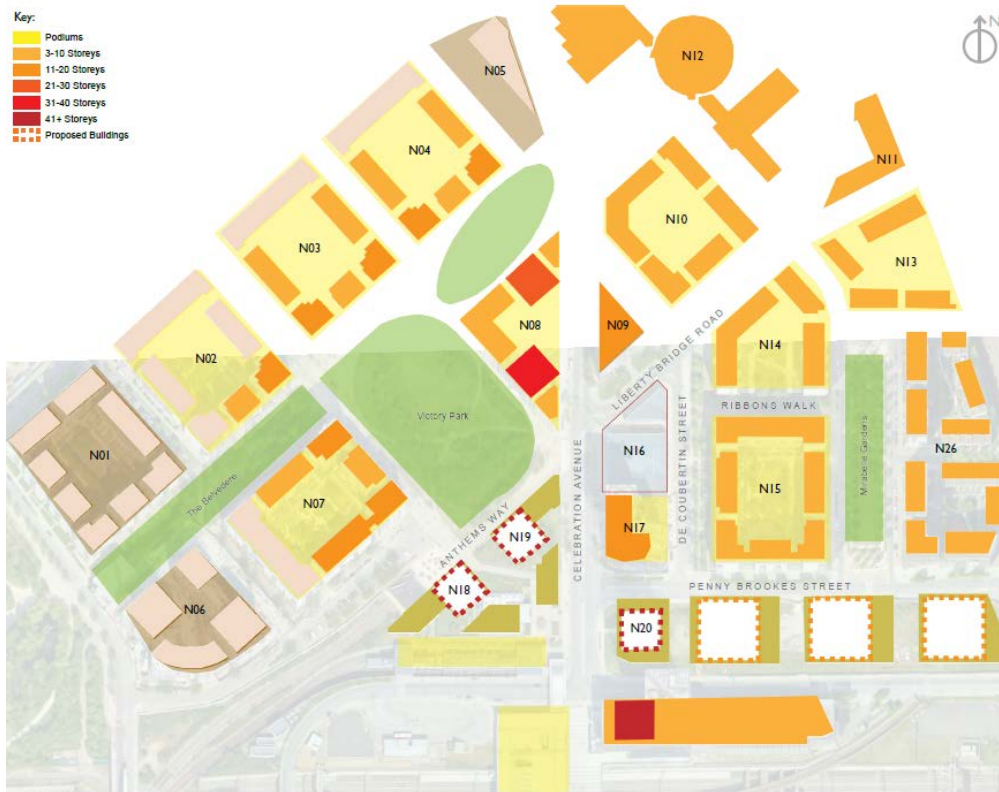


Figure 2-2: N16 Development Context

- 2.3 Victory Park is located to the west across Celebration Avenue and provides the main area of public open space in East Village and links to the Queen Elizabeth Olympic Park (QEOP) further west.
- 2.4 Two temporary two-storey buildings are currently situated on the Site and are occupied as a supermarket (now closed and relocating within East Village), gym and food and beverage units. These buildings are subject to a temporary planning permission approved in July 2013 (ref: 13/00140/FUM), with an expiration date in June 2023, with a new planning permission approved on 6 February 2023 to retain the buildings on site until June 2024 (ref: 22/00512/FUL). Following which the buildings will be removed. The Site also includes a slope from 13.5m AOD in the north to 10.8m AOD along De Coubertin Street in the southeast. The existing Site context is shown in Figure 2-3 below.



Figure 2-3: Site Context Photo

2.5 The main route to the Site is from Celebration Avenue, a two-way carriageway that runs north/south through East Village along the west of the Site and connects to the wider highway network. The road is adopted highway by the London Borough of Newham (LBN). There is a significant slope along Celebration Avenue from approximately 8.0m AOD at the DLR entrance up to 13.0m AOD at the northernmost edge of the plot. Celebration Avenue is well used by pedestrians coming to and from the DLR or Westfield.

## East Village

- 2.6 East Village comprises the main residential neighbourhood of the Stratford City development. It accommodated the Athletes' Village during the 2012 Olympic and Paralympic Games before being occupied by first permanent residents in 2013.
- 2.7 East Village has around 6,500 residents living within 3,839 homes of which 1,379 units are affordable homes.
- 2.8 East Village also comprises Chobham Academy and Sir Ludwig Guttman Health Centre. It also provides large and diverse range of open spaces ranging from Victory Park in the centre of East Village, to Stratford Wetlands (a biodiversity and ecological rich area) to the west.

## Stratford

- 2.9 Stratford is a major regeneration area which has brought forward approximately 13,000 new homes to date. Paragraph 5.1 in the LLDC Local Plan indicates this number will increase by 20,000 by 2036 resulting in a delivery of 33,000 homes within the Legacy Corporation area.
- 2.10 Stratford has become a Metropolitan Centre with an international role, providing an extension of the Town Centre around Westfield and a commercial office district in International Quarter London.
- 2.11 Universities have also established a reputation for undergraduate and postgraduate education with associated research and development activity within Stratford.

## University Campuses in the Area

- 2.12 University College London (UCL) has a brand-new campus, UCL East, located in the QEOP at East Bank. The first building opened to students in September 2022. The second main building is under construction and due to open to students in Autumn 2023. The new campus is set to provide education space for 4,000 students across 50,000 m<sup>2</sup> of development. This



space is set to include 550 bed spaces for student accommodation. Also set to open a campus at East Bank is UAL, who are planning to move the London College of Fashion (LCF) to a single campus on the East Bank site. The Stratford Waterfront hybrid planning permission secured consent in July 2019 (ref: 18/470/OUT) for the 41,965 m<sup>2</sup> of educational development. The CBRE Student Supply and Demand Report accompanying this planning application sets out that the UAL LCF will provide the learning space needed for 6,500 students. Figure 2-4 below provides a visual of the new UAL LCF building.



Figure 2-4: 3D image of the UAL building proposed at East Bank taken from the Stratford Waterfront Design and Access Statement

2.13 The CBRE Student Demand and Supply report highlights there are also a multitude of major university campuses already operational in Stratford. These are also included with the above in Table 2.1 below.

Table 2-1: Student Campuses and Capacity in the area.

University	Student Capacity
UCL	4,000
UAL LCF	5,500
University of East London and Birkbeck University of London (University Square Stratford)	15,000
Loughborough University	680
Staffordshire University London: Digital Institute campus	130
Total	25,310

2.14 Table 2-1 shows that over 25,310 students are expected to study in Stratford when all the new campuses are complete. Furthermore, the CBRE report notes that the Site is located in an area that enables 200,000 full time students in London to be within a 45-minute commute of their university campus.

# 3 Background Context and Planning History

---

## Stratford City

- 3.1 The Site is located within Zone 3 of the wider Stratford City development (Zones 3-6 taken together is now known as East Village, one of the largest Build to Rent (BtR) developments in the UK).
- 3.2 The SC OPP divides the Stratford City site into seven zones as follows:
- *Zone 1* primarily comprises Westfield Stratford City which opened in September 2011;
  - *Zone 2* also comprises IQL South forming the main commercial district supported by proportion of residential units. Two residential buildings and three commercial buildings are completed and occupied, with a further commercial building in construction.
  - *Zones 3-6* which comprises part of East Village (i.e., Zones 3a; 4a; 5 and 6) the main residential district of the Stratford City development that also accommodated the Athletes' Village during the 2012 Olympics. Part of Zones 3-6 (Zones 3b and 4b) comprise International Quarter London ("IQL") North part of the commercial district of the Stratford City development; and
  - *Zone 7* contains the semi-natural habitat areas adjacent to the QEOP to the west and a triangle between Zone 2 and the mainline railway corridor to Stratford Station in the south.
- 3.3 The SC OPP was approved subject to several planning conditions which control the form and implementation of future development within the entire Stratford City site. The SC OPP is also accompanied by a Section 106 Agreement (for the SV Land Zones 2-7) (dated 30 March 2012) and Deed of Variation ("S106 DoV" dated 25 March 2014). This establishes the principle of development for a building to come forward on Plot N16 within the parameters set out in the SC OPP.
- 3.4 The SC OPP development controls are set out in conditions attached to the planning permission and the Section 106 Agreement ("Section 106").

3.5 Figure 3-1 below shows Zones 3-6 and Plot N16 in the context of the various Stratford City zones:



Figure 3-1: Extract from the Zones 3-6 ZMP Illustrative Ground Floor Uses Plan Rev L, with the Site Shaded in red.

- 3.6 The initial focus of development at East Village was the delivery of the Athletes' Village to support the 2012 Olympic and Paralympic Games, that were subsequently occupied by permanent residents. Since then (in 2014), a suite of RMAs was approved by the LLDC PPDT for the remaining development Plots in Zones 3 and 5, namely Plots N05, N06, N08, N16 and N18/19. The Plots collectively secured RMA for 1,951 residential units. All units comprised market units except for Plot N05 which comprises 48 social rented units. A revised RMA for Plot N06 was also subsequently approved in 2017. Plots N08 and N06 have since been built and are now occupied. Plot N05 is under construction. The RMAs for Plots N16 and N18/19 have not been implemented.
- 3.7 Complementary retail and leisure facilities also complement the existing built units, typically at ground floor. Vast areas of open space (including Stratford Wetlands and Victory Park) and play areas in addition to significant infrastructure including in-ground services/utilities; bridges; roads and pedestrian and cycle networks were all delivered to support the new residential community at East Village.



## ZMP

3.8 Plot N16 is covered by the SC OPP Zone 3-6 Zonal Masterplan (ZMP), which provides a design framework and further parameters for detailed RMA applications to comply with. The Zone 3-6 ZMP was first approved in May 2008 (ref: 07/90208/AODODA) and subsequently updated in April 2009 (ref: 08/90342/AODODA), February 2010 (ref: 09/90400/AODODA), February 2011 (ref: 10/90272/AODODA), March 2013 (ref: 13/00053/AOD) and March 2014 (14/00010/AOD).

3.9 The ZMP comprises a Design Statement, an Access Statement and Parameter plans providing parameters for heights, plot boundaries, access, open space, and illustrative ground floor uses. Zones 3-6 have been built out or are in construction except for Plot N16 as well as Plot N18/N19, also in Zone 3 and N20-N23 in Zones 3 and 4 (known as the International Quarter London North), with the approved RMA details complying with the principles of the ZMP.

3.10 The key principles from the ZMP Drawings relevant to Plot N16 are shown in Figures 3-2 to 3-6 below.

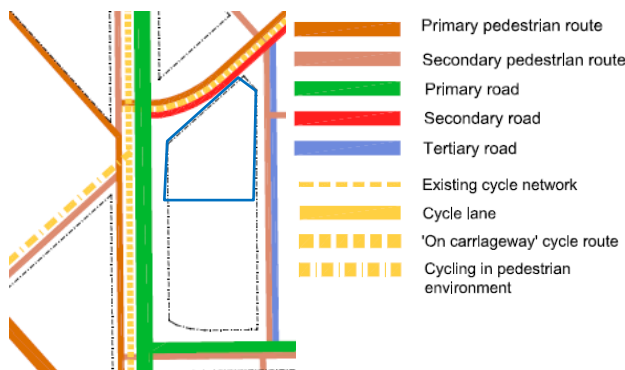


Figure 3-2: Zones 3-6 ZMP Composite Circulation Diagram Drawing Rev G (Site outlined in blue).

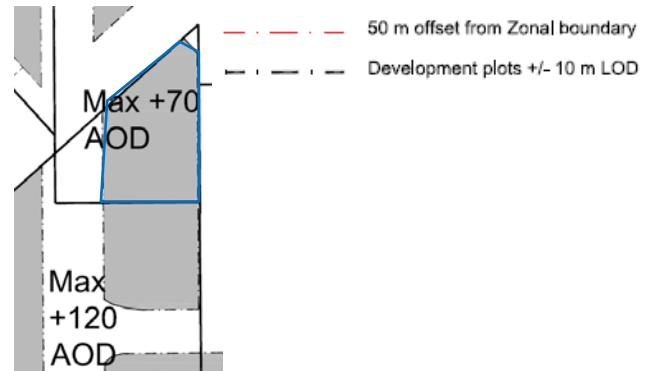


Figure 3-3: Zones 3-6 ZMP Development Heights Drawing Rev H (Site outlined in blue).

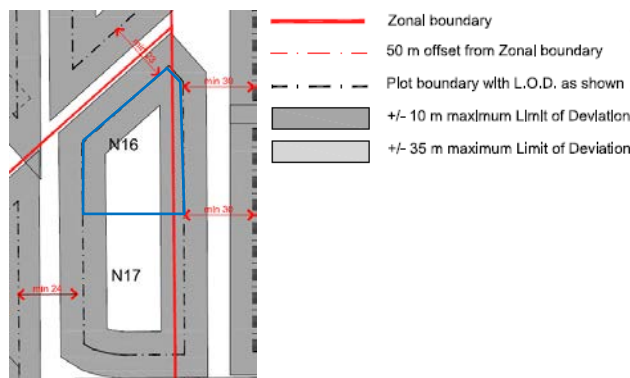


Figure 3-5: Zones 3-6 ZMP Plot Boundaries Drawings Rev F (Site outlined in blue).

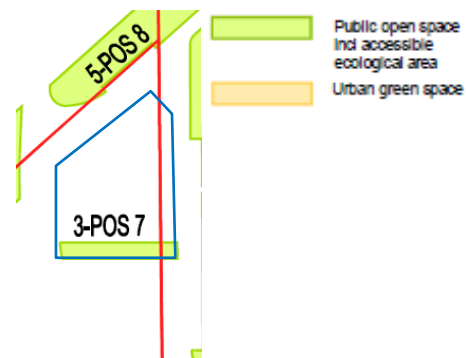


Figure 3-4: Zones 3-6 ZMP Open Space Drawing Rev G (Site outlined in blue).

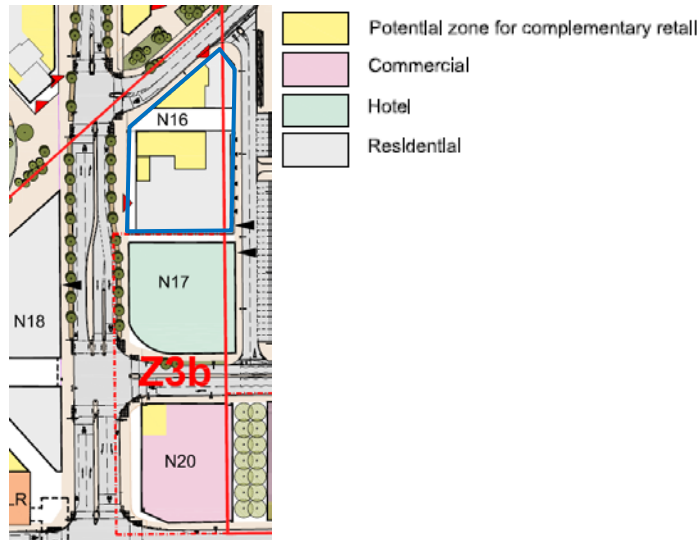


Figure 3-6: Zones 3-6 ZMP Illustrative Ground Floor Plan Rev L (Site outlined in blue).

3.11 In summary, the following ZMP design parameters are relevant to Plot N16:

Table 3-1: Relevant Zones 3-6 ZMP Design Principles for Plot N16.

Topic	Detail
Access	<ul style="list-style-type: none"> <li>Primary road/on-carriageway cycle route/primary pedestrian route to the west;</li> <li>Secondary road/on-carriageway cycle route/secondary pedestrian route road to the north; and</li> <li>Tertiary road/secondary pedestrian route to the east</li> </ul>
Heights	<ul style="list-style-type: none"> <li>Maximum height of 70m AOD</li> </ul>
Plot Boundary	<ul style="list-style-type: none"> <li>10m of deviation with minimum separation distances of 30m to Plots N14 and N15 to the east and 23m to Plot N09 to the north</li> </ul>
Open Space	<ul style="list-style-type: none"> <li>Area of Public Open Space with a minimum area of 356m<sup>2</sup> (defined in the 2010 ZMP Design Statement Addendum)</li> </ul>
Land Use	<ul style="list-style-type: none"> <li>Mainly residential with potential complementary retail on the ground floor</li> </ul>

## Plot N16

3.12 An RMA was previously approved for Plot N16 in 2014 (ref: 14/00056/REM) for the following development:

- 188 market residential units and 649m<sup>2</sup> of complementary retail floorspace; and
- Across a 70m AOD (16 storeys) building in the west, a 59m AOD (13 storeys) building to the north and 26m AOD (4 storeys) townhouses to the east.

3.13 However, this RMA has not been implemented, albeit it is still capable of implementation until the new Plot N18/N19 RMA is implemented.

3.14 A visual of the proposed massing under the existing RMA is provided in Figure 3-7.



Figure 3-7: 2014 RMA Massing Visual

3.15 In the interim,, a temporary building was approved in 2013 (ref: 13/00140/FUM) and constructed for the following development:

- Erection of 2 x 2 storey structures to provide Complementary retail (A1) convenience foodstore (now being relocated), Pub restaurant and cafe (A3-A5) and Gymnasium (D2). Currently occupied by Sainsbury’s, Better Gym, Neighbourhood Pub and Dough Daddy.

3.16 This planning permission was time limited to 30 June 2023, with a new planning application approved in February 2023 to retain the temporary buildings and uses on Plot N16 until June 2024 (ref: 22/00512/FUL).

## Other Relevant PBSA Developments

### *Delivery*

3.17 In recent years, 2,716 student bedrooms in PBSA schemes have been built out within the LLDC boundary. At present 3,128 student bedrooms are proposed in consented planning permissions, some of which are already under construction. Furthermore, the LLDC currently has planning applications for a further 985 student bedrooms awaiting determination. Overall, if all the PBSA schemes are consented and built out, this would provide 7,294 new student bedrooms within the LLDC. This is 3,206 student bedrooms short of providing enough student accommodation for the two new campuses at East Bank.

### *Amenity Benchmarks*

3.18 There is no planning policy or guidance setting out standards for student amenity or unit sizes mixes, with PBSA proposals following best practice and individual site briefs. The quality of student accommodation is fundamental to demonstrating design quality for PBSA proposals.

3.19 There are a range of other PBSA schemes constructed and approved in the LLDC, with a range of amenity provision. The following table identifies the key details relating to amenity provision from other recent and relevant PBSA schemes in the surrounding area.

Table 3-2: PBSA Developments in the Stratford area.

Site	Ref:	Rooms	Communal Amenity (m <sup>2</sup> )	Communal Amenity/ room (m <sup>2</sup> )	External Amenity (m <sup>2</sup> )	External Amenity/ room (m <sup>2</sup> )	Studio % M <sup>2</sup>	Ensuite room % M <sup>2</sup>
<b>Completed</b>								
Unite Group Student Accommodation, Angel Bridge Lane	12/00221/FUM	759	475	0.63	1518	2	8% 22m <sup>2</sup>	92% 11m <sup>2</sup>
Unite Plot S25	11/90618/FUMODA & 12/00224/FUL	1001	1000	0.99	900	0.9	11%	89%
Aspire Point, 206-214 High Street	13/00404/FUM	431	Not Stated	Not Stated	Not Stated	Not Stated	0	90%
Eleanor Rose House	15/00598/FUL	511	374	0.7	Not Stated	Not Stated	18% 21m <sup>2</sup>	82% 15.2m <sup>2</sup>
<b>Consented</b>								
UCL East	17/00235/OUT	1800	1134	0.63	1000	0.6	0	10.4m <sup>2</sup>
Former Truman Brewery Site – Fish Island	19/00185/FUL	330	627	1.9	363	1.1	2% 24.8m <sup>2</sup>	93% 14.1m <sup>2</sup>
Poland House	20/00310/FUL	282	619	0.5	600	0.5	0	100%
2, Jubilee House and Broadway House	21/00483/FUL	716	915	1.3	317	0.4	5% 30m <sup>2</sup>	91% 12.9m <sup>2</sup>
Former Piano Factory, Stour Road	22/00267/FUL	204	300	1.5	481	2.3	0	100% 12m <sup>2</sup>
302 - 312 Stratford High Street	22/00098/FUL	465	767	1.65	175	0.4	30% 15m <sup>2</sup>	100% 13m <sup>2</sup>
<b>Current Applications</b>								
Land Adjacent to Meridian Steps, Angel Lane	22/00178/FUL	943	1242	1.3	849	0.9	3% 23-25.8m <sup>2</sup>	100% 11.2m <sup>2</sup>
<b>Averages</b>								
Mean			N/A	1.1	N/A	1.0	7% 22.9m <sup>2</sup>	94% 12.5m <sup>2</sup>
Range			N/A	0.63 – 1.9	N/A	0.4 – 2	0 – 30% 15 – 30m <sup>2</sup>	82 – 100% 11 – 15.2m <sup>2</sup>

3.20 The average proportion of studio rooms in recent PBSA schemes in the surrounding area is 7% of the total number of bedrooms. The average studio size is 23m<sup>2</sup> and the range of studio sizes provided/proposed is 15m<sup>2</sup> to 30m<sup>2</sup>. The proposals for Plot N16 include a higher proportion of studios at 25%, which meets a demand for this type of bedrooms, with studios sized between 15.2m<sup>2</sup> to 22.5m<sup>2</sup> within the size range of other schemes in the LLDC.

- 3.21 The average proportion of ensuite rooms provided/ proposed in recent PBSA schemes within the LLDC is 94%. The average size of the ensuite room was 12.5m<sup>2</sup> and the range in sizes across the schemes was 11m<sup>2</sup> to 15.2m<sup>2</sup>.
- 3.22 The average size of amenity space provided/proposed in recent PBSA schemes within the LLDC was 1.1m<sup>2</sup>/room of communal amenity space and 1.0m<sup>2</sup>/room for external amenity space. This compares to 2.2 m<sup>2</sup>/room of communal amenity space (not including kitchen/dinner/lounge spaces (KDL)) and 1.4m<sup>2</sup>/room for external amenity space proposed in this planning application for Plot N16, demonstrating the generous amenity provision in the proposals.

# 4 Consultation

---

## Background

4.1 The Applicant has undertaken an extensive pre-application engagement and consultation exercise with the local planning authority, statutory consultees, neighbouring developers, local stakeholders, and the local community. The responses to these consultations have been fully considered through the design development of the Proposed Development. Full details are set out in the accompanying Statement of Community Involvement (SCI).

## Public Consultation

4.2 Two stages of public consultation have been undertaken in advance of submitting this planning application. A first phase of public consultation took place from February to May 2022 with information on the emerging proposals. A second and final phase was held between June – December 2022, where more detailed proposals were presented demonstrating how the feedback on the initial plans had been considered and factored into the designs. These events were held both in-person and online.

4.3 In addition, meetings were held with key stakeholders across the community from February to December 2022 and included meetings with local politicians, business groups, charities, local businesses and neighbouring landowners and direct neighbours.

4.4 A variety of community groups, resident associations, youth groups and local schools were also contacted as part of the process.

4.5 Details of the consultation with the local stakeholders and local community are set out in the Statement of Community Involvement (SCI) that accompanies this application. Further details of how consultation has influenced the layout and design of the development proposals are provided in the Design and Access Statement (DAS).

## LLDC PPDT

4.6 Pre-application meetings were held with officers at LLDC to discuss the detailed proposals from January 2022 to January 2023. These included sessions with planning, design, and landscape officers.

4.7 The majority of the engagement with the LLDC focused on the massing, quality of student amenity, layouts, and architecture. A number of design changes were made in response to officer comments, including:

- Reduction in units and percentage of studios;
- Reduced the massing;
- Increased corridor width;
- Introduction of roof top amenity space and roof terrace;

- Evolution of landscaping in the plot to enhance amenity provision and for colours and planting to compliment the architecture;
- Increase in room widths to allow flexibility of layouts;
- Replanning of the De Coubertin layout and frontage to maximise active frontage; and
- Evolution of façade design with introduction of Glenn Howell Architects in conjunction with TP Bennett.

4.8 The design evolution is discussed further in the DAS.

### **LLDC Planning Decisions Committee**

4.9 Two briefings with Planning Decisions Committee were held on 24 May 2022 and 24 January 2023. Members commented on the following main areas:

- Room sizes and how they could be laid out and used flexibly by students;
- Concentration of student accommodation in Stratford and Newham;
- The amount and quality of student amenity and how the different spaces are intended to be used;
- Distribution of affordable bedrooms across the development; and
- Microclimate conditions in the podium courtyard.

4.10 At the second briefing, Members generally supported the design evolution of the building and landscape and mainly commented about how the building and rooms could be used by students.

### **Built Environment Accessibility Panel (BEAP)**

4.11 The proposals for Plots N16 and N18/19 were presented to BEAP on 30 June 2022. The main comments related to patterns and graphics on the pavement, appropriate separation of footpath and cycle tracks, provision of accessible car and cycle parking, corridor widths and accessible and adaptable room provision.

4.12 Following the BEAP meeting, the architects, and the access consultants, Earnscliffe, have evolved the design to respond to the feedback, with a tracker of responses appended to the Design and Access Statement.

### **LLDC Quality Review Panel (QRP)**

4.13 The proposals were presented to QRP on 12 May 2022, 23 June 2022, 15 September 2022, and 12 January 2023. These sessions covered massing, architecture, layout, student amenity and landscaping.

4.14 In the final meeting, the panel commented that the scheme as presented would meet the exceptional design requirements of LLDC's Local Plan Policy BN5. In particular, they considered that:



- **Architectural Expression** – The fluted concrete façade, calmer massing along De Coubertin Street and double height of the undercroft were supported, with suggestions to further explore the materiality and generosity of windows to bedrooms in the base of the building;
- **Environmental Sustainability** – The Panel suggested further exploring the use of tinted glass, production of a circular economy statement and aiming beyond the embodied carbon target;
- **Landscape Design** – The Panel accepted that scheme not achieving the 0.4 UGF target due to its constrained nature and the proximity of the Queen Elizabeth Olympic Park (QEOP) and supported the multi-level external amenity provision. Further consideration should be given to how the courtyard and other external amenity spaces could be used and how students might want to use them;
- **Student Accommodation** – The kit of parts approach for student furniture in bedrooms and the improvements in the size and layout of shared KDL spaces were supported;
- **Ground Floor Use** – The Panel commended the moves to the east wing and undercroft to provide a larger exhibition space and shallower undercroft and suggested that allowing the café to spill out into the public realm would help activate the space.

4.15 The design responses and evolution are considered further in the DAS.

### Greater London Authority (GLA)

4.16 Meetings with the GLA were held on 8 April 2022 and 3 August 2022, where Transport for London (TfL) and the LLDC were also in attendance. A separate energy meeting was held with the GLA Energy Team on 10 August 2022. A summary of the key feedback from the second meeting is provided below:

- The indicative room layouts are well thought out and demonstrate that there is sufficient space within the rooms to be functional whilst providing a reasonable amount of storage space;
- Communal cluster living spaces should provide adequate kitchen facilities to serve the students occupying each cluster;
- Height and massing of the blocks seem to be logical, having regard to the context and daylight/ sunlight impacts;
- The accessibility to internal and external amenity space to all students is welcomed;
- Proposals should seek to meet the minimum on-site 35% reduction in carbon emissions beyond Part L of 2021 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund;
- Connection to the QEOP district heating network is welcomed and should continue to be prioritised and evidence of active two-way correspondence with the network operator should be provided;
- The site constraints to meeting UGF were appreciated along with the substantial off-site contributions being proposed in Victory Park and the Belvedere; and

- Considers it positive that the Applicant has already sought a partnership with UAL and that they intend to enter into a Nominations Agreement to manage over half the bedrooms.

### **Transport for London (TfL)**

4.17 Meetings have been held with TfL to discuss the Transport Assessment methodology and relevant aspects of the proposals. These are described in the Transport Assessment.

## 5 Application Proposals

---

5.1 This section of the Planning Statement provides a description of the proposals for which planning permission is sought. Further details are provided in the DAS and other documents which are submitted in support of the application.

### Overview of Proposals

5.2 The planning application seeks permission for the following development:

*“Full planning permission for the construction of a part 10-storey, part 18-storey building providing purpose-built student accommodation (Sui Generis), with commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking and other associated works”.*

5.3 In summary, the proposals comprise:

- A part 10-storey and part 18-storey building providing purpose-built student accommodation;
- 504 student bedrooms, with 250 (49.6%) directly let and 254 bedrooms (50.4%) subject to a Nominations Agreement with UAL;
- 180 (36%) bedrooms provided as affordable student accommodation and all to be included under the Nominations Agreement;
- A mix of room types, with 349 ensuite rooms (69% of total) and 25 (5%) Wheelchair Accessible Units (WAU), including 5 hoist rooms (1%) across all tenures and 130 studios (26%) in the directly-let part of the scheme;
- A total of 2,782m<sup>2</sup> internal amenity space comprising 763m<sup>2</sup> communal amenity spaces at the first (including students’ gym) and top floors, and shared kitchen, living and dining rooms in each bedroom cluster;
- 730m<sup>2</sup> of external amenity space provided as the first floor courtyard, the second floor sun terrace and the top floor roof terrace;
- A ground floor lobby with public access to areas for student and public exhibitions and a 175m<sup>2</sup> GEA café facing Liberty Bridge Road;
- A separate 170m<sup>2</sup> GEA retail/commercial unit on Celebration Avenue, with the café providing a total of 332m<sup>2</sup> GEA Use Class E floorspace;
- A total of 382 long stay spaces, with 20 (5%) for larger cycles – 381 spaces are provided for students in the cycle store at ground floor, including 19 larger spaces and a further larger bike space to be provided in the Celebration Avenue Class E unit;
- An accessible car parking space for residents on Liberty Bridge Road and 30 visitors cycle spaces along Liberty Bridge Road and Celebration Avenue;
- Two servicing bays, with one off Liberty Bridge Road and another on De Coubertin Street; and

- 'The Ribbon' a 690m<sup>2</sup> area of landscaped public open space focussed on Liberty Bridge Road and providing areas to rest and pedestrian routes through the Site from De Coubertin Street in the east to Victory Park to the west.

## Land Use

5.4 The proposed development would provide PBSA floorspace, with non-residential floorspace in Class E on the ground floor. The proposed floorspace is set out in Table 5-1 below:

Table 5-1: Proposed Floorspace.

Land Use	Use Class	Proposed Floorspace (Gross External Area) m <sup>2</sup>	
		GEA	GIA
Student Accommodation	Sui Generis	20,379	18,682
Café	E	174	160
Retail/ Commercial	E	158	153
<b>Total</b>		<b>20,711</b>	<b>18,995</b>

5.5 The PBSA floorspace includes a lobby open and student exhibition space in a publicly accessible lobby on Liberty Bridge Road, with shared student amenity at first floor and the roof terrace on the 17th floor and bedrooms spread across the first floor to 16th floors.

5.6 Two non-residential units are proposed, with a café (Use Class E) within the lobby and a separate commercial unit at ground floor on the Celebration Avenue. These are shown in the ground floor plan extract below.



Figure 5-1: Proposed Ground Floor Plan Extract

## PBSA Accommodation Schedule

5.7 The PBSA accommodation includes a range of unit sizes to respond to different need and demand, as well as providing a choice for students. The mix is set out in Table 5-2 below.

Table 5-2: PBSA Bedroom Size Mix

Room Type	Direct Let		Nominations				Overall		
	No.	%	Market		Affordable		Total No.	%	Room Area (m <sup>2</sup> )
			No.	%	No.	%			
Studios	130	25.8%	0	0%	0	0%	130	25.8%	15.2-22.5
Wheelchair Accessible (adapted) including hoist rooms	12	2.4%	4	0.8%	9	1.8%	25 (5 hoist)	5.0% (1% hoist)	25.3.3-40.4
Ensuite	108	21.4%	70	13.9%	171	33.9%	349	69.2%	13.5-15.2
Total per Tenure			74	14.7%	180	35.7%			
Total Direct/ Nominations	250	49.6%	254		50.4%		504	100%	

5.8 The scheme is designed to allocate over half the bedrooms (254) to be subject to a Nominations Agreement with UAL as the relevant HEI, to comply with the requirements of London Plan Policy H15.

5.9 36% (180) of the bedrooms will be provided as affordable student accommodation and comply with the Fast Track Route approach set out for PBSA in London Plan Policies H5 and H15.

5.10 A letter from UAL is submitted with this application setting out their involvement in the design of the proposals, their support for the scheme and their commitment to enter into a Nominations Agreement for the 254 bedrooms identified above.

## Amenity

5.11 The proposals include a range of shared amenity for students on each floor comprised of:

- KDLs provided with each cluster providing shared living space outside of bedrooms and areas for students to socialise;
- First floor shared amenity space for all students, providing study spaces and social spaces linking to the central external courtyard space;

- A central courtyard with generous planting, seating, and areas for activity such as table tennis, with steps up to a sun terrace a level 2 where further seating is provided;
- A roof terrace and students lounge on the 17<sup>th</sup> floor.

5.12 The amount of amenity space and generous proportion per bedroom is summarised in Table 5-3 below.

Table 5-3: Amenity Areas

Type	Area (m <sup>2</sup> )	m <sup>2</sup> /bedroom
Internal Amenity (1 <sup>st</sup> and top floor)	763	1.5
Internal and Shared Amenity (Communal and KDL's)	2,782	5.5
External Amenity	730	1.4

5.13 The proposed amenity areas per bedroom is consistent with the higher end of the other examples in the LLDC, demonstrating good proportions of amenity against local benchmarks.

5.14 Figure 5-2 below provides a diagram showing the different types of amenity space in the building.

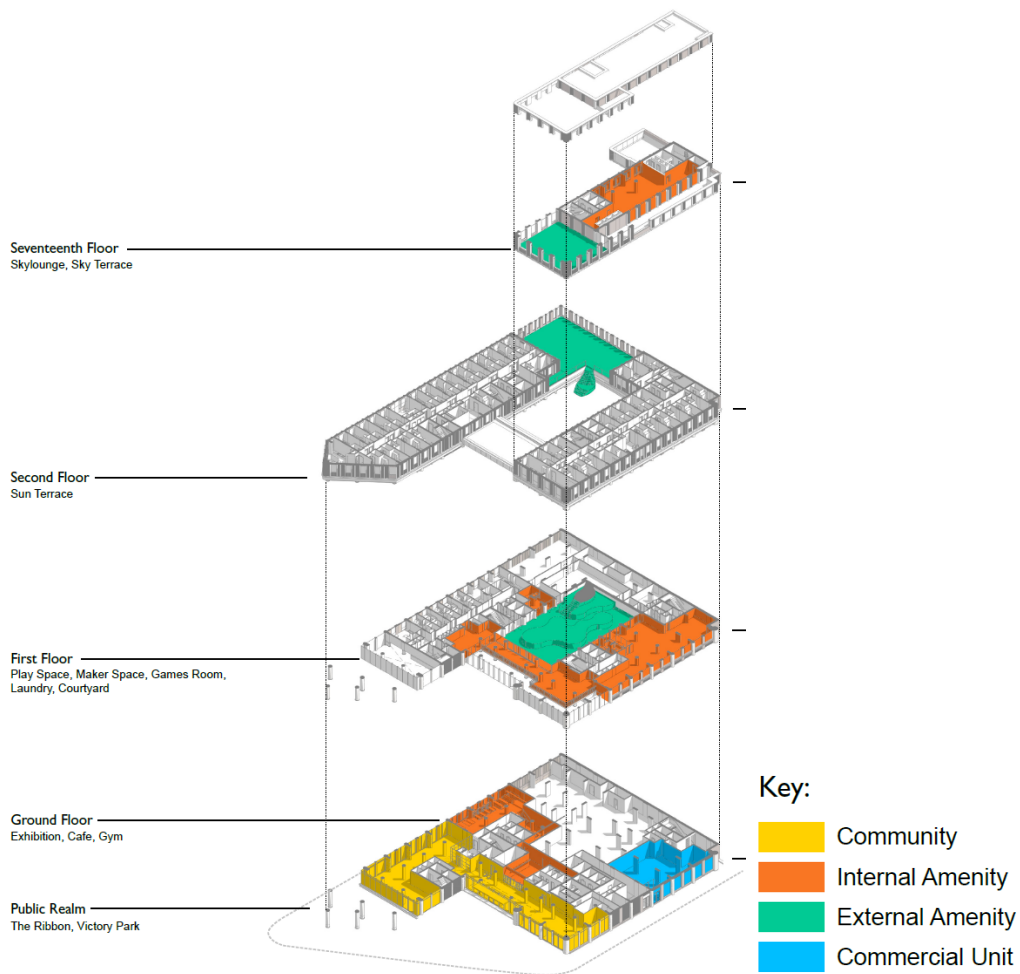


Figure 5-2: Amenity Spaces Extract from the DAS.



## Massing and Height

- 5.15 The 18-storey building in the west (the “West Wing”) is approximately 71m AOD in height and the 10-storey building in the east (the “East Wing”) is approximately 47m AOD in height. The West Wing and the East Wing are linked by a two storey raised courtyard.
- 5.16 The building form is comprised of a ground floor covering the plot, with a first floor set around a central external courtyard, with the West Wing rising a further 17 floors above and the East Wing a further eight floors.
- 5.17 The massing strategy follows the approach from the 2014 RMA, with a lower block on De Coubertin Street stepping down to reflect the 9/10-storey buildings at 43m AOD on Plots N14 and N15, as shown in Figure 5-3.



Figure 5-3: Visual showing Plot N16 massing stepping down to the east (to the right in the image).

- 5.18 The maximum height of 71m AOD on the West Wing marginally exceeds the maximum 70m AOD height parameter in the SC OPP for Plot N16 but is designed to reflect the 70.3m Adagio hotel on Plot N17 adjacent to the south. When seen along Celebration Avenue, the proposed massing forms a coordinated step up in heights from south to north stepping from 87.9m at the Gantry Hotel, to 70.3m for the Adagio, 71.0m for the Site and 58.0m in Plot N09 to the north of the Site. This approach is shown in Figure 5-4.



Figure 5-4: Celebration Avenue Elevation showing heights stepping up to the south (to the right in the image).



## Appearance

- 5.19 The façade is designed with a light, warm-coloured precast concrete frame, with aluminium window framing and louvres and glazing.
- 5.20 Across the building, these materials are used to emphasise different elements and to respond to different surrounding contexts, as follows:

### Base

- 5.21 This is expressed as a two storey height element with large glazing panels in each bay to active the streets around the building and maximising active frontage to respond to the changes in levels around the site.



Figure 5-5: Base detail shown on Celebration Avenue (top left), Liberty Bridge Road (top right) and De Coubertin Street (bottom left)

### Middle

- 5.22 Typical bays across the main accommodation levels are articulated as a single 2.7m wide and 3.0m high unit, which is repeated to create a regular and consistent rhythm and order. The main element of the unit is the vertical, fluted concrete column. The concrete is a light, warm stone-like colour and would be prefabricated to ensure a high-quality finish, as illustrated in Figure 5-6.



Figure 5-6: Typical middle bay.

## Top

- 5.23 The two wings of the building have different conditions at their tops and so differing expressions. The lower east wing has lift overruns, smoke extract fans and an array of photovoltaic panels upon its roof. Its top is therefore a solid parapet that conceals the equipment behind from view. This treatment has also been used on the lower parapets of the west wing (type A).
- 5.24 The northern end of the taller west wing has an external, landscaped roof terrace for use by students and an adjacent skylounge. This amenity space is celebrated by an extended height and open 'crown' at the top of the building (type B).

## Landscaping

- 5.25 The proposed landscaping is focussed around four key spaces, with new public realm around the Site and internal amenity spaces at three different levels and shown in Figure 5-7. Overall, these comprise:
- **The Ribbon** – A 690m<sup>2</sup> space on Liberty Bridge Road providing the main public space. Containing multi-purpose spaces, a circular meeting point framed by seasonal trees and a series of rain gardens, as well as improved pedestrian and bicycle connections.
  - **Central Courtyard at Level 1** – A 335m<sup>2</sup> space providing linked amenity space to the internal shared communal areas, with the aspiration of blurring the lines between internal and external spaces. At this level the landscaping focusses around a green island allowing for a range of spaces and multiple seating arrangements to allow the space to be used for a range of activities.
  - **Sun Terrace at Level 2** – A 246m<sup>2</sup> space linked via steps from the Level 1 courtyard lift access between the levels within the East Wing. This terrace is designed with greenery and seating and will be an area ideal for morning activities as it receives good levels of sunlight during the early hours of the morning.
  - **Sky Lounge at Level 17** – Comprising an area of 140m<sup>2</sup> and providing a space for different group activities, like yoga. Its aspect offers great views towards Victory Park and the City of London and received good levels of sunlight throughout the day all year around.

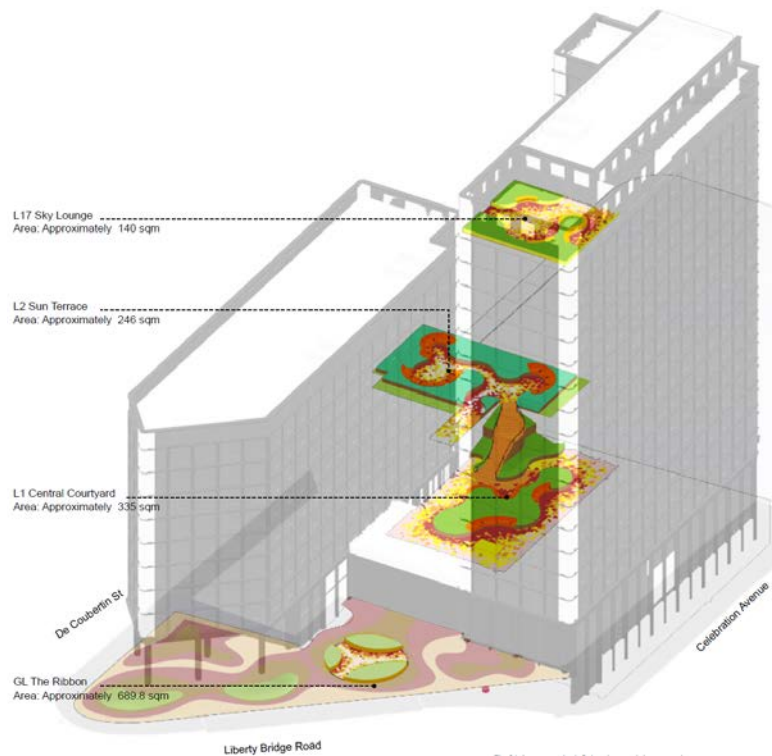


Figure 5-7: Landscape areas

- 5.26 The landscaping also includes green roofs carefully located to increase biodiversity. The amount of green roof proposed at 1,012m<sup>2</sup>, is balanced against the high sustainability aspirations of the scheme and use energy efficiency measures, such as Photovoltaic panels.
- 5.27 Overall, the scheme has sought to maximise the UGF within the Site across the different spaces and green roofs, resulting in a UGF of 0.34. The assessment and calculation for the UGF is explained further in Section 7.16 of the DAS. The extent of the greening is shown in the Illustrative Landscape Plan in Figure 5-8 below.



Figure 5-8: Illustrative Landscape Plan

5.28 The proposals facilitate investments and enhancements in the existing public realm proposed in the associated public realm detailed planning application. These enhancements include an increased UGF of 0.54 from 0.46, an increase of 0.08 in UGF in respect of that separate application.

5.29 The GLA in the August 2022 preapplication meeting acknowledged the impact of site constraints in meeting the 0.4 UGF target and appreciated the maximised approach on-site along with the substantial off-site contributions being proposed in Victory Park and the Belvedere.

## Access and Parking

5.30 The proposals include long and short stay car and cycle parking, as well as servicing bays. In summary these comprise:

- A new blue badge parking bay off the highway on Liberty Bridge Road;
- Two servicing access bays, with one off Liberty Bridge Road and a second on De Coubertin Street;
- A cycle store at ground floor level providing 381 spaces accessed from a dedicated access from Celebration Avenue and also through generous accesses from the main lobby on Liberty Bridge Road;
- A further long-stay cycle parking space to be provided within the Use Class E unit on Celebration Avenue;
- Short-stay cycle parking in the public realm for 30 spaces.

5.31 A plan of the ground floor access, with parking and servicing is provided in Figure 5-9.

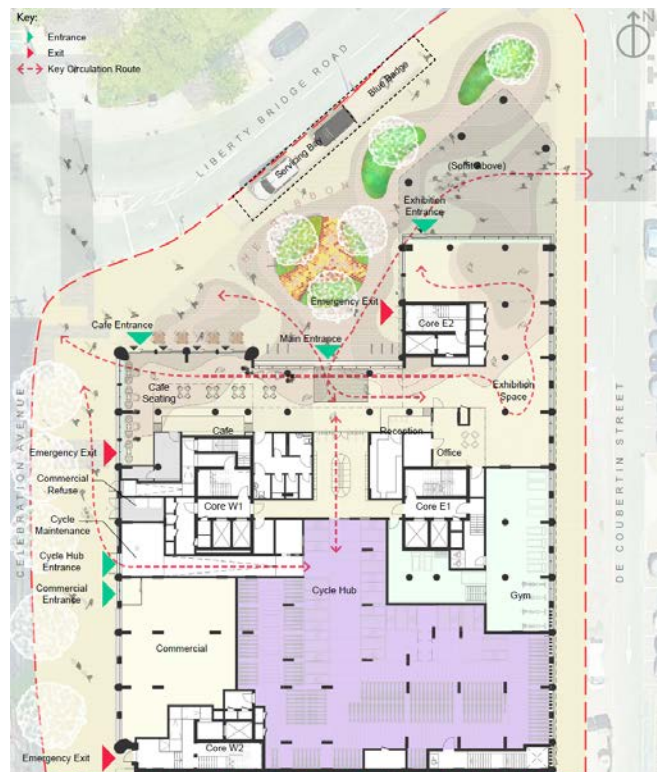


Figure 5-9: Diagram showing proposed access and parking.



# 6 Planning Designations and Policy Context

---

## Introduction

6.1 This Section provides the national, strategic, and local planning policy context to the proposals and describes the designations affecting the Site. A summary of the relevant planning policies and guidance is included at **Appendix 1**.

### The Development Plan

6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the adopted development plan for the Site comprises:

- The London Plan – the Spatial Development Strategy for London (March 2021);
- LLDC Local Plan 2020-2036 (adopted July 2020); and
- LLDC Local Plan Policies Map (adopted July 2020).

### The London Plan

6.3 The London Plan was published in March 2021 and forms the overall strategic plan for London providing city wide policy and guidance for London for the period 2021 to 2041.

6.4 Policy GG2 'Making best use of land' seeks to create sustainable mixed-use places that make the best use of land. This must be achieved through enabling development of brownfield land; prioritising sites in Opportunity Areas (OA's) and those well-connected to public transport and amenities for higher density development; and applying a design-led approach to determine the optimum development capacity of sites.

6.5 The Site is located in Stratford which sits within the Olympic Legacy Opportunity Area (OA) (the former Lower Lea Valley OA) and is subject to Policy SD1, 'Opportunity Areas', which considers that these areas should optimise residential and non-residential outputs and densities, contribute to meeting or exceeding the minimum guidelines for housing and supporting wider regeneration.

6.6 Supporting Table 2.1 estimates of the employment capacities and a minimum of new homes up to 2041 for each of the OAs. The Olympic Legacy OA has an indicative development capacity of 65,000 jobs and 39,000 homes.

6.7 Figure 2.19 of the plan also identifies Stratford as a Strategic Area for Regeneration, which Policy SD10 'Strategic and London Regeneration' states is where development that contributes to the renewal of town centres should be supported.

6.8 Furthermore, Figure A1.1 of Annex 1 of the London Plan shows future potential changes to the Town Centre Network and identifies Stratford's development into an International Centre.

## Local Planning Policy

6.9 The LLDC Local Plan (adopted July 2020) sets out a vision and key policies for the future development of the LLDC area up to 2036.

6.10 LLDC Local Plan Strategic Policy SD1: Sustainable Development is an overarching policy relevant to all development and states:

*“When considering development proposals, the Legacy Corporation will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).”*

6.11 Strategic Policy SP:2 seeks to help maximise opportunities for deliver homes through delivering in excess of the 2,154 annual target from the London Plan for new homes and a 35% target for new affordable housing across the area.

6.12 The LLDC Policies Map (July 2020) should be read with the Local Plan and identifies the following spatial designations that relate directly to the Site:

- Site allocation SA2.2 (East Village) ;
- Metropolitan Centre (southern part of the Site); and
- Local Centre (western part of the Site).

6.13 The Site is adjacent to or in the vicinity of the following designations:

- Local Open Space.

6.14 The extent of the designations referred to above (within the Site and its surrounding context) is illustrated in Figure 6-1 below.

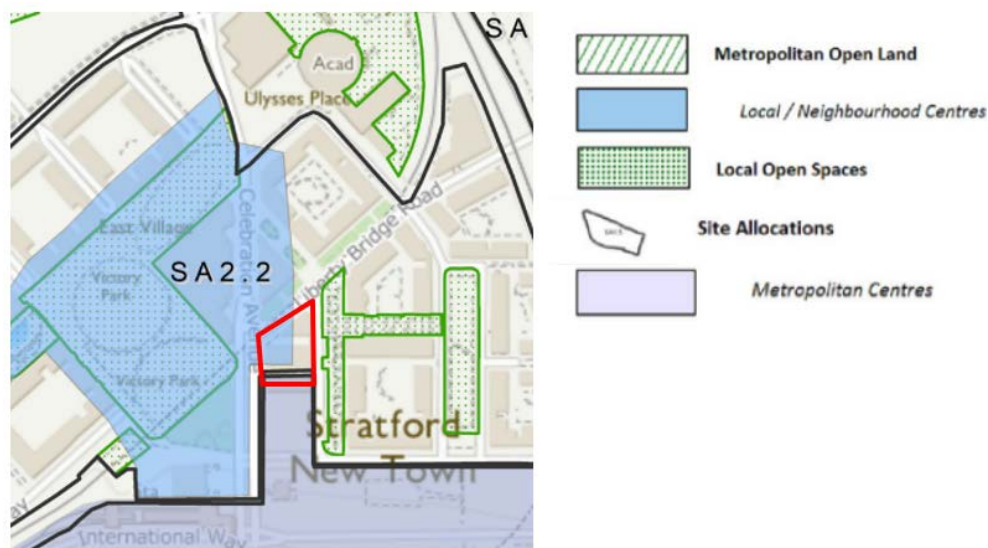


Figure 6-1: Extract from the LLDC Proposals Map

6.15 Section 11, Sub Area 2: North Stratford and Eton Manor provides details for Site Allocation SA2.2: East Village and provides the following description of what future development is appropriate within the site:

*“Family-focused, medium- to high-density residential development with public open spaces and new Local Centre. Remaining development plots provide capacity for residential development and for retail and commercial uses at ground-floor level within the Local Centre. Retail space within Local Centre not to exceed a total of 9,999 sqm.”*

6.16 The key diagram for Site Allocation SA2.2 is provided in Figure 6-2 below.

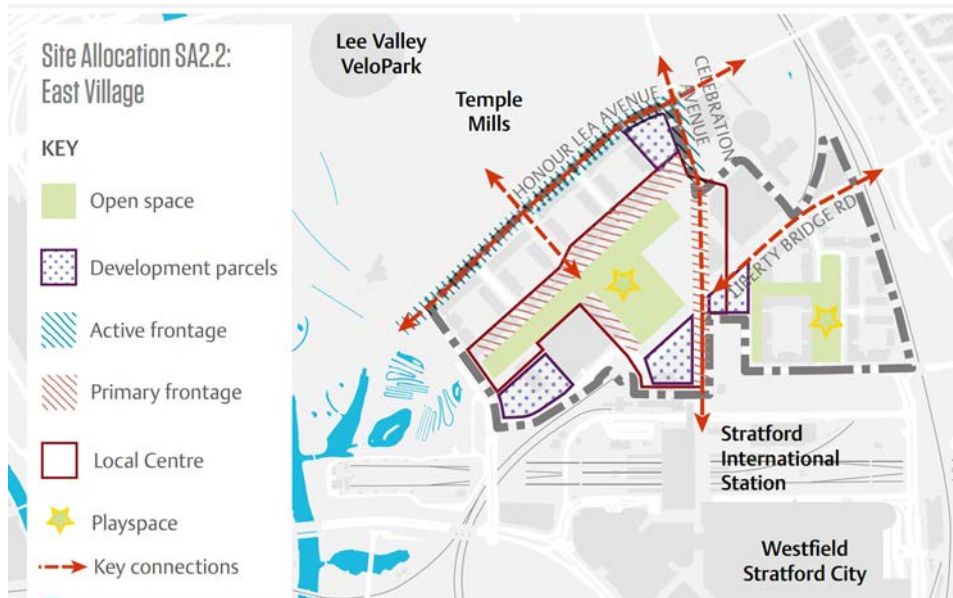


Figure 6-2: Extract of Site Allocation SA2.2 Key Diagram

6.17 The Site is identified as a Development Parcel, with the relevant supporting development principles for future development in Site Allocation SA2.2: East Village provided in Table 6-1 below.

Table 6-1: Relevant Site Allocation SA2.2 Development Principles

Supporting Development Principles
Development around existing open space and street network
Tall buildings and higher densities in southern area close to Stratford International Station and Stratford Metropolitan Centre, medium densities, and heights elsewhere
Subject to Policy 2.3, seek to provide retail and non-residential activities onto route between Stratford International Station and Chobham Manor
Ensure strong pedestrian and cycle links to Chobham Academy and Sir Ludwig Guttmann Health Centre
The site allocation is expected to yield a minimum of 1,950 new homes (gross) with affordable housing being delivered in accordance with the current planning permission.

6.18 Sub Area 2 Policy 2.3 ‘Local Centre and non-residential uses’ defines all non-residential floorspace within the Local Centre boundary as Primary Frontage, including the Site. Within the Local Centre future uses should support its local retail function and add to the vitality and attractiveness of the primary frontage area.



## Other Material Considerations

### National Planning Policy

#### National Planning Policy Framework (July 2021)

6.19 In July 2021, the Government published revisions to the NPPF (which was originally published in March 2012). The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions (Paragraph 2).

#### *Sustainable Development*

6.20 Paragraphs 7 and 8 of the NPPF state that the purpose of the planning system is to contribute to the achievement of sustainable development, which has the following three overarching objectives:

*“an economic role – to help build a strong, responsive and competitive economy...*

*a social role – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations...*

*an environmental role to contribute to protecting and enhancing our natural, built and historic environment...”*

6.21 The NPPF is underpinned by a presumption in favour of sustainable development. Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan without delay.

6.22 Section 11 'Making effective use of land' sets out in Paragraph's 119 and 120 the decisions should promote an effective use of land in meeting the need for homes and other uses and should inter alia:

*"encourage multiple benefits from both urban and rural land, including through mixed use schemes...;*

*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs....;*

*promote and support the development of under-utilised land ...”*

#### *Student Accommodation*

6.23 Section 5 "Providing a Sufficient Supply of Homes" emphasises the importance of bringing forward enough land to meet the needs of specific housing requirements (Paragraph 60). It adds the size, type and tenure of housing required for various groups in the community, including students, should be assessed, and reflected in planning policies (Paragraph 62).

## *Design*

6.24 Paragraph 126 states that good design is a key aspect of sustainable development, with Paragraph 130 setting out that design considerations for planning decisions, including ensuring proposals:

- *Will function well and add to the overall quality of the area;*
- *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *Are sympathetic to local character and history, including the surrounding built environment and landscape setting;*
- *Establish or maintain a strong sense of place;*
- *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and*
- *Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*

6.25 Paragraph 134 states that development that is not well designed should be refused, specifically where it does not reflect local design policies and government guidance on design. It attaches great weight to:

*“a) development which reflects local design policies including guidance and supplementary planning documents such as design guides and codes; and/or*

*b) outstanding or innovative designs which promote high levels of sustainability, help raise the standard of design more generally in an area and fit in with the overall form and layout of their surroundings.”*

6.26 Section 8 ‘Promoting healthy and safe communities’ states that decisions should aim to achieve inclusive and safe places through mixed use developments, active street frontages, layouts that encourage walking and cycling and are safe and accessible (Paragraph 92).

## *Climate Change*

6.27 In Section 14, the NPPF makes reference to new development complying with requirements for decentralised energy supplies and taking account of landform, layout, building orientation, massing, and landscaping to minimise energy consumption (Paragraph 157).

## *Transport*

6.28 Section 9 provides considerations for promoting sustainable transport. The NPPF considers that significant development should be focused on locations which are sustainable (Paragraph 105), ensuring that opportunities to promote sustainable transports modes have been taken up and safe and suitable access to the site can be achieved for all users (Paragraph 110). This is supported by paragraph 112, which considers that developments should prioritise pedestrian and cycle movements, address the needs of people with disabilities and reduced mobility, create places that are safe and secure, allows for efficient servicing and emergency vehicles and be designed to enable charging of plug-in and other ultra-low emission vehicles.

- 6.29 Paragraph 111 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

### *The Natural Environment*

- 6.30 Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by measures, including providing net gains for biodiversity and preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution or land instability.
- 6.31 Paragraph 185 states that planning decisions should ensure that new development is appropriate for its locations considering the likely effects of pollution on health, living conditions and the natural environment. Adding that new development should mitigate and reduce to a minimum potential adverse impact resulting from noise.

### *Decision-taking*

- 6.32 The NPPF also contains policy on decision taking, with Paragraph 38 stating that local planning authorities should approach decisions on proposed development in a positive and creative way and that decision-makers at every level should seek to approve applications for sustainable development where possible.

### *Planning Obligations*

- 6.33 The subsection 'Planning obligations and conditions' in Section 4 sets out the approach local authorities should take when considering planning conditions and obligations.
- 6.34 Paragraph 56 states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise, and reasonable in all other respects.
- 6.35 Planning obligations should only be sought where they meet the tests set out in Paragraph 57 to ensure they are necessary, directly related to the development and reasonably related in scale in kind to the development.
- 6.36 As stated in Paragraph 58 planning applications should comply with up-to-date policies setting out contributions expected from development, with them and should be assumed to be viable. Adding that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

### **National Planning Practice Guidance**

- 6.37 On 6<sup>th</sup> March 2014, the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG) to provide supporting guidance to the NPPF. The supporting guidance covers a range of topics, a summary of the most relevant guidance to Plot N16 PBSA proposals are discussed below.

### *Student Housing*

- 6.38 The NPPG requires strategic policy-making authorities to plan for sufficient student accommodation and to consider options to support the needs of the student population and local residents before imposing restrictions on students living outside university-provided accommodation.
- 6.39 The NPPG also notes that encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock.
- 6.40 Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. It notes that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock.
- 6.41 Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area (Reference ID: 67-004-20190722).

### *Design*

- 6.42 The NPPG states that good design is set out in the National Design Guide under the following 10 characteristics: context; identity; built form; movement; nature; public spaces; uses; homes and buildings; resources; and lifespan (Reference ID: 26-001-20191001).

### **National Design Guide**

- 6.43 The National Design Guide was first published by the Government in October 2019 and updated January 2021 as planning practice guidance to ensure that all aspects of good design are considered in planning proposals. The guidance outlines the Government's priorities for well-designed places in the form of following ten characteristics:
- Context – enhances the surroundings.
  - Identity – attractive and distinctive.
  - Built form – a coherent pattern of development.
  - Movement – accessible and easy to move around.
  - Nature – enhanced and optimised.
  - Public spaces – safe, social, and inclusive.
  - Uses – mixed and integrated.
  - Homes and buildings – functional, healthy, and sustainable.
  - Resources – efficient and resilient.
  - Lifespan – made to last.

## Supplementary Guidance

### *Regional Guidance*

- 6.44 The Lower Lea Valley OA Planning Framework was adopted in January 2007 and subsequently replaced by the Olympic Legacy Supplementary Planning Guidance (SPG) in July 2012. The Mayor of London has adopted a series of SPGs to provide further guidance to London Plan policies, of which the following are relevant to these proposals:
- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
  - Affordable Housing and Viability Supplementary Planning Guidance (SPG) (August 2017);
  - London View Management Framework (March 2012);
  - Lower Lee Valley Opportunity Area Planning Framework (OAPF) (January 2007);
  - Olympic Legacy SPG (July 2012);
  - Social Infrastructure SPG (May 2015); and
  - Use of planning obligations in the funding of Crossrail and the Mayoral CIL (April 2013).
- 6.45 The Mayor of London is also, currently, consulting on five London Plan guidance documents that will support the new London Plan when adopted. These include:
- Public London Charter - consultation draft (October 2020);
  - Circular Economy Statements - consultation draft (October 2020);
  - Whole-life Carbon Assessments - consultation draft (October 2020); and
  - 'Be Seen' Energy Monitoring Guidance - consultation draft (October 2020).

### *Local Guidance*

- 6.46 The LLDC have adopted a range of Supplementary Planning Documents (SPDs) adding further guidance to the policies contained in the LLDC Local Plan. The following are considered relevant to the Site and the proposals:
- Planning Obligations Supplementary Planning Document (October 2022); and
  - Carbon Offset Supplementary Planning Document (August 2016).

### *GLA Annual Monitoring Report*

- 6.47 The London Plan Annual Monitoring Report (AMR) for the period 2018/2019 was published in March 2021. This report provided information on approvals and delivery of student bedrooms across London and at a borough level, with Stratford Metropolitan Centre covered within the LBN.
- 6.48 Table 6-2 summarises the student bedroom information for London and LBN.

Table 6-2: London AMR 2018/2019 Student Bedrooms Monitoring

Type	London (bedrooms)	LBN (bedrooms)	LBN %
Completions (Table 3.17)	1,759	445	25%
Approvals (Table 3.24)	3,424	524	15%
Starts (Table 3.29)	2,298	0	0%
Pipeline on 31 March 2019* (Table 3.36)	11,414	1,475	13%

6.49 The latest London Plan AMR is for the period 2019/20 and was published in November 2022. However, this version does not track the delivery of student housing directly; instead, student accommodation is tracked within the non-self-contained units category.

*LLDC AMR 2021/2022 (July 2022)*

6.50 The LLDC's latest AMR published in July 2022 for the period April 2021/22 shows 2,716 completed student bedrooms and 2,312 student bedrooms to be completed in the LLDC, equating to a total of 5,030. See table of identified schemes in **Appendix 1**.

6.51 Figure 6 of the LLDC AMR shows how the student accommodation is distributed across the LLDC and is provided as **Appendix 1**. This shows that that the main focus of PBSA is along Stratford High Street and at UCL East, with the Unite buildings on Plot S25 and Angel Lane the only developments within Stratford City.

*Historic England Advice Note 4 Second Edition (Adopted March 2022)*

6.52 Historic England Advice Note 4 was published in March 2022 and provides guidance on planning for tall buildings within the historic environment.

6.53 The second edition includes a greater focus on plan-led approaches throughout, extended sections on design and the efficient use of land, and clear case studies.

6.54 The note considers that where full planning permission for a tall building is to be sought, suitable planning conditions and obligations can be used for the detailed design, materials and finishes, and treatment of the public realm, as well as for achieving proportionate public and community benefits.



# 7 Planning Considerations

---

## Introduction

7.1 This Section considers the development proposals against the relevant planning policies and guidance set out in the documents referred to in Section 6 and **Appendix 1** and other material considerations. The following matters are considered in turn:

- Principle of Development;
- Student Accommodation Use;
- Non-Residential Uses;
- Tall Buildings;
- Design;
- Transport;
- Energy and Sustainability;
- Environment and Flood Risk;
- Archaeology; and
- Socio-Economics

## Principle of Development

7.2 This application seeks full planning permission for the construction of a part 10-storey, part 18-storey building providing PBSA (Sui Generis), commercial, business and service floorspace (Use Class E) at ground floor, with landscaping, parking and other associated works.

7.3 The NPPF supports the effective use of land through encouraging mixed-use development of under-utilised and suitable brownfield land (Paragraph's 119 and 210).

7.4 London Plan Policy D3 states that development should make best use of land following a design-led approach that optimises capacity of sites, including site allocations. Higher density developments are promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

7.5 The Site is located within the Olympic Legacy OA within the London Plan (the former Lower Lea Valley OA) which has an indicative capacity for 39,000 new homes and 65,000 new jobs. London Plan Policy SD1 aims to ensure that OAs realise their growth and generation potential by creating opportunities for new housing, commercial development and infrastructure whilst supporting wider regeneration in the area. The application proposals positively contribute to realising these aims.

7.6 Stratford is identified within the London Plan as a Metropolitan Centre which comprises a range of town centre uses and has good accessibility to public transport. Stratford is also identified

as a potential future International Centre which is characterised by being a globally recognised retail and leisure destination with excellent public transport accessibility and high-quality architecture. This recognises the changing and increasing profile of Stratford as an important Centre and a significant urban area as the Olympic legacy is realised.

- 7.7 London Plan Policy SD8 ‘Town centre network’ sets out the hierarchy of town centre uses and considered Local centres like East Village should focus on providing local goods and services well accessed by walking and cycling.
- 7.8 Policy B.2 and Table 4 of the LLDC Local Plan supports small scale retail and office uses serving a local catchment within the East Village Local Centre and supported by Site Allocation SA2.2 (East Village). Table 7-1 below demonstrates how the proposal achieves the key principles of Site Allocation SA2.2.

**Table 7-1: Site Allocation SA2.2 Development Principles**

Site Allocation SA2.2 Development Principles	Proposals
Development around existing open space and street network	The proposals for the development of Plot N16 accord with, and respond to, the masterplanning principles for the area, including the existing open space and street network. The proposals are also consistent and compatible with the principles of the SC OPP and subsequent development.
Tall buildings and higher densities in southern area close to Stratford International Station and Stratford Metropolitan Centre, medium densities, and heights elsewhere	The proposed part-10 storey building (47m AOD in height) and part-18 (71m AOD in height) is considered to be appropriate for the location of the Plot N16, consistent with the densities and heights of the surrounding development. The height and density of the proposals are also similar to the development that was previously approved for the site (i.e. 16 / 13 storey buildings accommodating 188 residential units) (ref: 14/00056/REM).
Subject to Policy 2.3, seek to provide retail and non-residential activities onto route between Stratford International Station and Chobham Manor	Active uses comprising a public lobby (entrance, café and exhibition space) and a retail/commercial unit are proposed at ground floor level.
Ensure strong pedestrian and cycle links to Chobham Academy and Sir Ludwig Guttmann Health Centre	The proposals are designed to utilise and enhance these links. Through reinforcing the building lines, providing active uses on ground floor and enhancing the legibility of the routes in the landscape from Celebration Avenue and Liberty Bridge Road.
The site allocation is expected to yield a minimum of 1,950 new homes (gross) with affordable housing being delivered	The proposed 504 units of student accommodation (36% affordable student accommodation) will make a significant contribution to this objective, forming part

in accordance with the current planning permission.	of a broader housing mix which is appropriate for the area.
---	---

- 7.9 In summary, the proposal will optimise the development of brownfield land in a highly accessible location where development is directed. The proposed development would create 504 student bedrooms (36% affordable) which would contribute to London Plan and local housing delivery targets, as well as generating jobs through the construction of the development and the operation of ground floor commercial/flexible uses, all of which are appropriate for the Site’s location within the Stratford Metropolitan Centre.
- 7.10 Therefore, the principle of the proposed development is in accordance with planning policy at all levels, as well as the objectives of the SC OPP. The principle of the proposed development is also similar to that of the development that was previously approved for the Site (i.e. 16 / 13 storey buildings accommodating 188 residential units) (ref: 14/00056/REM), notwithstanding that this permission has not been implemented.
- 7.11 The proposals for Plot N16 form part of a masterplan approach with Plot N18/N19 to maximise housing delivery in the Plot N18/N19 RMA and proposed enhancements to the public realm in Victory Park and the Belvedere. Currently, students occupy many conventional housing units in East Village, with 54% of homes at N06 occupied by students. One of the benefits of the proposals relates to the specialist PBSA will encourage students to move from existing housing in East Village and release conventional housing in East Village to more local people.
- 7.12 The additional development on Plot N16 also creates a unique opportunity to provide an additional public benefit through the funding of the comprehensive enhancement of key areas of public realm in the immediate vicinity of the Site and to increase housing delivery in this highly accessible location.
- 7.13 These resulting public benefits are listed in Section 1 but include the provision of a new pavilion, enhanced planting, play space and amenity provision in Victory Park and the Belvedere, with improved pedestrian and cycle routes through the public realm and N18/N19. Proposals for the enhancement of these public realm areas are subject of a new standalone detailed planning application that will be submitted concurrently.
- 7.14 This masterplan approach responds to up-to-date planning policy at all levels which seek to ensure the optimal use of accessible sites to accommodate higher density development, particularly a mix of residential uses, in accordance with the overarching economic, social and environmental objectives. These policy objectives have been strengthened since the SC OPP was originally approved and the proposals have also been informed by the successful development of the Stratford East area during the intervening period, as well as broader social, economic and environmental factors.

## Student Accommodation Use

- 7.15 London Plan Policy H15 ‘Purpose-built student accommodation’ sets out specific requirements and considerations for PBSA development. These requirements include:
- the development contributing to a mixed and inclusive neighbourhood;

- the use of the accommodation must be secured for students;
- the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms must be secured through a nomination agreement for occupation by students of one or more higher education provider;
- the accommodation must provide adequate functional living space and layout; and
- the accommodation is developed in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

7.16 Supporting paragraph 4.15.2 of Policy H15 explains that the overall strategic requirement for PBSA in London has identified an annual need of 3,500 PBSA bed spaces over the Plan period. The following paragraph 4.15.3 clarifies that the need for PBSA is not broken down into borough-level targets as:

*“...the location of this need will vary over the Plan period with changes in higher education providers’ estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding.”*

7.17 London Plan Policy H1 ‘Increasing Housing Supply’ requires boroughs to optimise the potential for housing delivery (for all tenures) on all suitable and available brownfield sites. In particular, sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary, such as the Site, which has a PTAL of 6b.

7.18 At a local level, Local Plan Policy H.4 ‘Providing student accommodation’ states that student accommodation should be directed to appropriate locations within or on the edge of the Metropolitan Centre, such as the Site.

7.19 The Student Demand and Supply Report submitted in support of the planning application assesses the demand and supply of student accommodation in relation to the application site. The principal findings of this assessment are as follows (page 33):

- The Site meets Local Plan Policy H.4 since there is a proven need for PBSA in Greater London and the immediate area, the Site is on the edge of the Metropolitan Centre and has excellent walking cycling and public transport accessibility.
- The Site is ideally located within walking/cycling distance to several major universities and is in a prime location for the new institutions opening campuses in Stratford (e.g., UAL LCF (and UCL East)). It is estimated that there will be over 26,000 full-time students in Stratford alone.
- There are just over 1,760 operational beds across two schemes within a 0.5 mile radius of the Site, which suggests that the proposals will not result in any over-concentration of PBSA in the immediate area.
- The proposals will provide modern, top quality PBSA providing students with brand new services and amenities that will enhance their student experience.

- It is estimated that within Stratford there are over 3,500 full-time students who are not served by the existing student accommodation market.
- The development of the Site would provide an opportunity to reduce the number of students reliant on the HMO market. In turn, this can alleviate the pressures on local housing as a supply of medium density housing in central locations can be reverted back to family housing.

7.20 As explained earlier, the PBSA which is the subject of this planning application is being advanced in consultation with the UAL, who the Applicant is seeking to sign a Nominations Agreement with for over 50% of bedrooms. The PBSA will provide modern affordable student accommodation in accordance with their requirements, particularly their requirement for the accommodation to be local to their campus (which is located approximately 400m away from the Site). This is fundamental to the UAL's commitment to develop a successful new arts campus in the East Bank cultural and education district, contributing to the broader objectives for Stratford and London as a whole.

7.21 UAL consider that the Plot N16 site is ideally suited to meet their student accommodation requirements, recognising that it is supported by a range of existing and high-quality amenities and public realm that will directly support their students. The UAL Supporting Letter which is submitted in support of the planning application explains the particular attributes of the Site as follows:

*“Locationally, Plot N16 is ideally suited to serve our needs:*

- *It is located in highly accessible location within easy walking/cycle distance to our new campus at East Bank;*
- *It has a plethora of established amenities on its doorstep – ranging from independent retailers at East Village to world class sporting facilities at the adjacent QEOP;*
- *Future student residents will integrate seamlessly into the existing thriving neighbourhood at East Village, making a positive contribution to the community whether by bringing a new demographic dimension to East Village and/or making an important contribution to the local economy/retailers;*
- *Get Living has a vested interest in East Village, and that is evident through the high quality and well-maintained public realm. This is the environment we want our students to reside within supporting health and wellbeing;*
- *It is a safe and secure community – which is of paramount importance to us.”*

7.22 254 bedrooms (50.4%) are proposed to be subject to a Nominations Agreement with the UAL LCF. 180 bedrooms (36%) would be provided as affordable student accommodation and be included under the Nominations Agreement. The Nominations Agreement and affordable student accommodation provision will be secured through a S106 Agreement. Draft Heads of Terms for this agreement in compliance with the requirements of London Plan Policy H15 are submitted with this application.

- 7.23 More generally, the PBSA proposed on the Site will complement and diversify the existing mix of residential uses in East Village which is currently predominantly BtR residential accommodation. This location benefits from great access to local amenity and open space, with Victory Park adjacent and the QEOP a short distance from the Site.
- 7.24 In contrast the majority of existing PBSA in the local area is generally located in the south of Stratford (e.g. Aspire Point QMUL, Eleanor Rosa House, University of London), albeit that the main focus of PBSA within the borough of Newham is along Stratford High Street. The exception being UCL East being constructed on the edge of the QEOP for UCL students.
- 7.25 The proposed provision of PBSA on the Site is in accordance with policy and will deliver high quality student accommodation that meets an identified requirement and brings benefits to the area.

### Bedroom Mix

- 7.26 London Plan Policy D7 'Accessible housing' states that at least 10% of dwellings should meet Building Regulation requirement M4(3) 'wheelchair user dwellings'.
- 7.27 London Plan Policy D5 'Inclusive design' requires proposals to achieve the highest standards of accessible and inclusive design. To meet the high standard the proposals must meet criteria set out in Policy D5. This includes providing spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, be able to be used easily and with dignity for all and designed to incorporate safe and dignified emergency evacuation for all.
- 7.28 The London Plan provides no space standards for PBSA development. London Plan Policy D6 'Housing quality and standards' supporting text (paragraph 3.6.2) does not set out non-conventional housing space standards. However, the GLA in their report from the August 2022 pre-application meeting considered that the indicative layouts are well thought out and demonstrate that there is sufficient space within the rooms to be functional whilst providing a reasonable amount of storage space.
- 7.29 The supporting text in London Plan paragraph 4.15.6 explains that the design of PBSA developments must be high quality and in accordance with the requirements of Policy D3 'Optimising site capacity through the design-led approach' (considered further in the Design section).
- 7.30 The design and mix of the proposed accommodation have been informed by the requirements of UAL and, in accordance with policy, optimised through a design-led approach which has included a comprehensive programme of pre-application consultation with the LLDC, GLA and four QRP meetings.
- 7.31 As explained fully in the DAS, a mix of room types is proposed on the Site, with 349 ensuite rooms (69.2% of total) and 25 (5%) Wheelchair Accessible Units (WAU), including 8 hoist rooms (1.6%) across all tenures and management and 130 studios (25.8%) in the directly-let part of the scheme.
- 7.32 The provision of studios is higher than some other PBSA examples in the LLDC. However, the provision of studios helps provide a range of accommodation types along with clusters of



bedrooms around shared KDL to meet different demands for PBSA. The studio provision is also only located in the direct-let part of the development, where students will not necessarily be from UAL LCF, unlike those in the portion of the building covered by the Nominations Agreement.

- 7.33 The unit mix and layouts have been informed by consultation with the LLDC PPDT, Members, QRP and GLA, who supported the final unit mix and layout principles.

#### Affordable Student Accommodation

- 7.34 The London Plan defines affordable student accommodation in paragraph 4.15.8 as:

*“...a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic year.”*

- 7.35 The Mayor defines the rental level for affordable student accommodation for the coming academic year in the Mayor’s AMR. The latest version of the AMR was published in November 2022 and stated for the academic year 2022/2023 the annual rental cost for affordable PBSA must not exceed £6,967.
- 7.36 Policy H15 of the London Plan emphasises the importance of securing the greatest level of affordable housing. It also specifies that in order for PBSA development to proceed on the Fast Track Route, a minimum of 35% of bedrooms (50% on public land) must be secured as affordable student housing.
- 7.37 LLDC Local Plan Policy H.4 ‘Providing student accommodation’ reiterates the London Plan requirements for PBSA proposals to secure nominations agreements, meet strategic need and provide the maximum level of on-site affordable student provision.
- 7.38 In accordance with planning policy, it is proposed that 180 (36%) bedrooms are provided as affordable student accommodation and all of these are to be included under the Nominations Agreement. As explained above, these commitments would be secured through the proposed S106 Agreement.

#### Non-Residential Uses

- 7.39 The proposals incorporate 332m<sup>2</sup> GEA commercial, business, and service floorspace (Use Class E) at ground floor, provided as a 158m<sup>2</sup> commercial unit along Celebration Avenue and a 174m<sup>2</sup> café within the main public lobby on Liberty Bridge Road.
- 7.40 The principle of non-residential uses on the Site is supported by planning policy, with the Site designated within a Development Parcel of Site Allocation SA2.2, where residential with localised retail functions on the ground floors are encouraged. The Site is also located within the Local Centre boundary of East Village.

- 7.41 LLDC Strategic Policy SP.1 sets out how the LLDC will develop a strong economy by expanding opportunities for businesses and providing additional floor space in a range of sizes, types and forms.
- 7.42 Policy B.2 of the LLDC Local Plan supports a range of town centre uses within the Stratford Metropolitan Centre. Site Allocation SA2.2 (East Village) specifies that small-scale retail and office uses will be supported that serve a localised catchment area.
- 7.43 The proposed uses are appropriate in town centre locations, consistent with the LLDC Site Allocation SA2.2, within the Local Centre boundary and will help to provide active frontages and provide space for supporting flourishing business sectors and retailers.
- 7.44 The type and quantum of the proposed non-residential uses are intended to complement the principal PBSA use of the proposed development, contributing to the successful development of the Plot N16 and the broader use mix of the wider area.

## Tall Buildings

- 7.45 This application seeks approval for a part 18-storey and part 10-storey building providing PBSA. The 10-storey building in the east (the “East Wing”) is approximately 47m AOD in height and the 18-storey building in the west (the “West Wing”) is approximately 71m AOD in height. The West Wing and the East Wing are linked by a two storey raised courtyard. Further details are provided in the DAS and the drawings submitted in support of the application.
- 7.46 Policy D9 supports tall buildings where they are identified within development plans. It states that tall buildings should consider the visual, functional, environmental, and cumulative impacts.
- 7.47 Policy BN.5 (Tall Buildings) of the LLDC Local Plan directs tall buildings to the Metropolitan Centre first before other local centres and includes further assessment criteria for tall buildings proposals. Table 11 of the LLDC Local Plan sets out the prevailing height of 30m for Sub Area 2 covering the Site, with tall buildings on undeveloped plots closest to the boundary with the Metropolitan Centre. Proposals above the prevailing height will need to demonstrate they exhibit exceptionally good design by meeting criteria including the need to respect the scale of the existing context and provide active street frontages.
- 7.48 The Site is located adjacent to Metropolitan Centre and within East Village Local Centre where Site Allocation SA2.2 states that tall buildings and higher densities should be focussed close to Stratford International Station and Stratford Metropolitan Centre. Therefore, the LLDC Local Plan supports the location of the Site for tall buildings.
- 7.49 The height of the proposals has been informed by, amongst other things, the height and form of the surrounding development. To the south on Plot N17 there are two adjoined hotel buildings, with the Adagio at 16-storeys rising to 70.3m AOD immediately adjacent to the Site and the Gantry at 21-storeys rising to 87.9m AOD further south on Penny Brookes Street. The 12-storey (58.0m AOD) residential building of N09 is located to the north of the Site across Liberty Bridge Road. Two further residential buildings are located to the east of De Coubertin Street, with the 9-storey (43.0m AOD) Plot N14 building and Plot N15 buildings rising to a maximum of 10-storeys (43.5m AOD).

7.50 The height of the proposals is also similar to that of the development that was previously approved for the site which comprised 188 residential units accommodated across a 70m AOD (16 storeys) building in the west, a 59m AOD (13 storeys) building to the north and 26m AOD (4 storeys) townhouses to the east (ref: 14/00056/REM).

7.51 Details of how the proposals meet the requirements of LLDC Local Plan Policy BN.5 are provided at Section 4.8 of the DAS and summarised below.

Table 7-2: LLDC Policy BN.5 Response

Policy BN.5 Criteria	Design Response
1. An appropriate proportion, form, massing, height and scale in context with the character of its surroundings.	<ul style="list-style-type: none"> <li>▪ The proposal is well proportioned to the immediately adjacent context, using similar grid and storey dimensions.</li> <li>▪ The form of the building is attuned to the current and emerging urban grain of its surroundings, allowing permeability where necessary.</li> <li>▪ The height and scale of the proposal are in line with the overall urban incline from Waltham Forest, Redbridge and Newham up towards Stratford City and Central London.</li> </ul>
2. Use of material appropriate to the height of the building.	<ul style="list-style-type: none"> <li>▪ Precast panels are well-suited for use on a proposal of this scale.</li> <li>▪ The facade system has relatively low embodied carbon metrics compared to other suitable cladding materials for buildings this size.</li> <li>▪ The material is robust, durable, long-lasting and low maintenance.</li> </ul>
3. Acceptable access and servicing arrangements.	<ul style="list-style-type: none"> <li>▪ Although the slope of the site presents significant challenges to accessing the building at ground floor, street-level activation has been a key priority and has been carefully designed in.</li> <li>▪ Plant and servicing access has been positioned in the sole location where street-level activation has not been programmatically possible. This has been grouped with the adjacent servicing entrances for the neighbouring buildings, in order to minimise the extend of inactive facade in an otherwise unbroken active frontage.</li> </ul>
4. A positive contribution to the public realm at ground level.	<ul style="list-style-type: none"> <li>▪ As mentioned previously, the scheme provides welcoming and active frontages around the perimeter of the ground floor, ensuring significant enhancement to the public realm.</li> <li>▪ In addition, a new and interconnecting public realm has been proposed to the north of the site, The Ribbon. This route links Ribbons Walk (existing) to</li> </ul>

	the Ribbon (new) and on to Victory Park (improved), effectively connecting the east and west pockets of East Village.
5. A positive contribution to the surrounding townscape:	<ul style="list-style-type: none"> <li>▪ The scheme is specifically designed to be part of a wider whole - collection of high-quality buildings that come together to form a coherent and architecturally distinct urban environment.</li> </ul>
6. Creation of new or an enhancement to existing views, vistas and sight-lines where there is an opportunity to do so.	<ul style="list-style-type: none"> <li>▪ The proposed development permits a visual and walkable connection between Mirabelle Gardens in the east to the rest of Victory Park via The Ribbon and Fashion Square and beneath the undercroft.</li> <li>▪ Liberty Bridge Road is aligned to a view of The Shard, which will be maintained and in no part impeded by the development.</li> </ul>

7.52 The QRP report from the 12 January 2023 confirmed that the scheme as presented would meet the exceptional design requirements of LLDC’s Local Plan Policy BN5.

7.53 The visual, functional and environmental impact considerations of London Plan Policy D9 are considered below.

#### Visual Impacts

7.54 The proposal responds to the existing character, scale and massing of the local context and delivers a high-quality, mixed use development, which is not visible in the background view of St Paul’s Cathedral when viewed from LVMF Assessment Point 9A.1 in Richmond Park.

7.55 The massing supports the height strategy in the area stepping up to the Metropolitan Centre to the south, with QRP confirming that the scheme meets the exceptional design standards.

7.56 A Townscape and Visual Impact Assessment (TVIA) accompanies the application and assesses the visual impacts on the townscape. In paragraph 4.9 the TVIA considers that the development would enhance the public realm and local connectivity, providing improved and animated frontages to those streets it overlooks. Adding that the treatment of the elevations and the overall massing would generate liveliness and enhance the setting to Victory Park and the high quality architecture and materiality would relate well to the massing, form and character of the surrounding buildings and the urban grain.

#### Functional Impacts

7.57 The building is designed in accordance with all latest fire safety guidance, with multiple lifts and stairs in each core, including evacuation lifts.

7.58 Servicing impacts to the public realm are minimised through the provision of two servicing bays, with direct access to the commercial and PBSA bin stores.

- 7.59 A large lobby is proposed, with a café and exhibition space and along with the access to the ground floor cycle store, is designed to meet the access requirements of the peak time in the morning when students leave for lectures.
- 7.60 The Site is located within an OA and Metropolitan Town Centre and has an excellent level of accessibility to public transport (PTAL 6b). The Site is therefore appropriately located for a tall building. This is reinforced in the Olympic Legacy SPG which states that Stratford's excellent access to public transport makes it a suitable location for tall buildings and high-density development, particularly where regeneration priorities are delivered.
- 7.61 The 332m<sup>2</sup> Class E floorspace on the ground floor helps provide local jobs and more services to the East Village Local Centre.

### Environmental Impacts

- 7.62 Furthermore, the proposals have been assessed through various models including Internal and External Daylight, Sunlight and Overshadowing assessments and a Wind Microclimate Assessment. As demonstrated within the Daylight Sunlight and Overshadowing Assessment Impact on Neighbouring Properties Report, the effects of the on the surrounding sensitive receptors are considered negligible when compared against the 2014 RMA using the future baseline with the N18/N19 RMA.
- 7.63 The Wind Microclimate Assessment (also submitted in support of the application) explains the results of a comprehensive quantitative wind microclimate assessment which has been undertaken for the proposals. This concludes that with the proposed development in place the wind microclimate in the public realm will remain suitable for the planned uses in existing surrounding context with the cleared Plot N18/19 site. Wind mitigation measures such as trees will need to be developed and validated to mitigate local impacts on the southeast corner of Plot N08 and for the Plot N/16 building entrances along Celebration Avenue.
- 7.64 It also concludes that in the future surrounding context including the proposed Plot N18/19 development and the proposed Victory Park/Belvedere development there are no safety impacts and local wind mitigation measures such as trees are only required for the building entrances of the proposed Plot N/16 development along Celebration Avenue to ensure suitable wind comfort in the worst season. The use of trees as wind mitigation for the proposed Plot N18/19 development has been shown to be effective in mitigating these residual impacts.
- 7.65 Finally, it is concluded that cumulative wind impacts of the proposed Plot N/16, Plot N18/19 and proposed Victory Park / Belvedere with the committed developments are such that no wind mitigation measures are required.

### Summary

- 7.66 In summary, the Site is appropriate for a tall building and complies with the relevant design principles and growth objectives within the development plan set out in London Plan Policy D9 and LLDC Local Plan Policy BN.5 and has been endorsed by the LLDC's QRP. Further information on the design evolution and key components of the design of the Proposed Development are provided in the accompanying DAS.



## Design

### *Design Quality*

- 7.67 The NPPF in Paragraph 134 attaches great weight to development which reflects local design policies and government guidance on design set out in the National Design Guide, to outstanding or innovative designs and help raise the standard of design more generally in an area.
- 7.68 The National Design Guide outlines the Government's priorities for well-designed places. These should consider the design quality and response to context, identity, built form, movement, nature, public spaces, uses, functional buildings, resources, and lifespan.
- 7.69 The London Plan encourages development to optimise site capacity through a design-led approach, with higher density developments promoted in well-connected locations according to Policy D3 'Optimising site capacity through the design-led approach. The policy sets out a range of design considerations covering topics such as form/layout, experience, quality, and character.
- 7.70 Further design considerations are set out in London Plan Policy D4 'Delivering good design', which explains the design of proposals should retain design quality through to completion by providing the maximum detail appropriate to avoid the need for later amendments and to avoid deferring the assessment of design.
- 7.71 Strategic Policy SP.3 'Integrating the natural, built and historic environment', sets out the LLDC's approach to Design. New development should contribute to a high-quality built and natural environment.
- 7.72 Policy BN.1 (Responding to Place) of the LLDC Local Plan encourages consideration of various design principles including existing typologies, relationship to the local context, improved connectivity, making use of existing physical infrastructure, a mix of uses and amenity.
- 7.73 Policy BN.4 of the LLDC Local Plan requires all design of mixed use and residential developments to achieve the highest possible standards in design, construction, and use. New employment and retail floorspace are encouraged to be designed flexibly to maximise potential uses and take-up through provision of adaptable space (paragraphs 4.19 and 4.24).
- 7.74 The application proposals have been informed by a detailed analysis of the Site's surroundings, the requirements and constraints of the Site. It has also been designed in accordance with the guiding design principles for Site Allocation SA2.2 (East Village), which seeks to provide small-scale retail and office/workshop space at ground level and residential development at upper stories to increase its function as a local centre.
- 7.75 A high-quality design is proposed, with all units meeting internal and external amenity standards and receiving good levels of daylight and sunlight for this location. Steps in the massing are utilised for planted terraces to green the building and provide additional communal amenity space. The façade is designed with external materials comprising a high-quality finish and detailing.

- 7.76 A Circular Economy Statement accompanies the application and explains the how the design approach prioritises Circular Economy principles and will help to reduce the material impact and waste generated by the Proposed Development throughout its lifecycle.
- 7.77 Flexible use floorspace is proposed on the ground floor of both buildings and designed to be able to be easily adapted between different uses, such as retail, café, office or community uses.
- 7.78 Further details of the proposed design can be found within the supporting DAS.
- 7.79 The following sub-sections set out the key residential design quality standards and how these are met by the proposals.

### *Internal Daylight and Sunlight*

- 7.80 A Daylight, Sunlight and Overshadowing Impacts Assessment assessing internal impacts (“Internal DSO”) has been submitted in support of this application. The results of the technical assessments have shown acceptable levels of daylight with:
- The effects of the proposed N16 development on the surrounding sensitive receptors are considered to be negligible when compared against the Consented N16 RMA in the future baseline;
  - Approximately 72% of the windows and 52% of the rooms will experience improvements in vertical sky component and no-sky line respectively, when compared to the consented RMA in the consented baseline;
- 7.81 Overall, the DSO assessment concludes that the application proposals are consistent with policy and guidance, which states that daylight and sunlight levels should be appropriate for their context, with the levels of daylight and sunlight within the proposal typical within a city centre location.
- 7.82 Therefore, the scheme offers future residents’ acceptable levels of daylight and sunlight amenity, in line with policies BN.1 BN.4 and BN.5 of the LLDC Local Plan (2020).

### *Amenity*

- 7.83 Policy BN.4 of the LLDC Local Plan introduces the requirement for all residential and mixed-use developments to incorporate sufficient, well designed and appropriately located communal and private amenity space.
- 7.84 The incorporation of high quality amenity space has been integral to the design process for the proposals, ensuring that an appropriate amount and range of spaces are located accordingly throughout the buildings so that the student accommodation functions successfully and meets the requirements of the residents. 2,782m<sup>2</sup> of internal communal amenity space is proposed at the first and top floors, with shared kitchen, living and dining rooms in each bedroom cluster.
- 7.85 In addition, 730m<sup>2</sup> of external amenity space is also proposed, comprising the first floor courtyard, the second floor sun terrace and the top floor roof terrace. The external amenity is proposed at different levels to provide a choice of spaces, with the roof terrace receiving good levels of sunlight all year round and the courtyard providing areas of shade in the summer.

- 7.86 The Internal DSO demonstrates that cumulatively 38% of the different external amenity spaces within the building will enjoy two or more hours of direct sunlight on 21<sup>st</sup> March (below the 50% BRE recommendation), which is good for a constrained urban site. However, 64% of both the Level 1 and Level 18 sun terrace will receive or more hours of direct sunlight on 21<sup>st</sup> March and will be highly usable spaces in the winter, with the courtyard providing opportunities for shade in the summer. There was also a 20% improvement from the overshadowing in the 2014 RMA.
- 7.87 The proposed amenity space per room is generous and compares well against other schemes in the LLDC, with communal amenity space (not including kitchen/dining/living rooms) at 2.2 m<sup>2</sup>/room greater than other schemes identified in the LLDC and external amenity space at 1.4 m<sup>2</sup>/room higher than the LLDC average of 1.0 m<sup>2</sup>/room.

### *Public Open Space*

- 7.88 Local Plan Policy BN.7 'Improving Local Open Space' states that major development schemes should consider the provision of new, high-quality, and publicly accessible Local Open Space.
- 7.89 Overall, 690m<sup>2</sup> of new public open space is proposed within the Site on Liberty Bridge Road and will provide publicly accessible amenities, along with any reinstatement of public realm along Celebration Avenue and De Coubertin Street.
- 7.90 Furthermore, it is worth noting that the Site is located within a reasonable and easy distance of the amenities of the QEOP, which is an open space of regional scale.
- 7.91 The Wind Microclimate Assessment shows that with the proposed development in place, with some mitigation measures to mitigate local impacts required on the southeast corner of Plot N08 and Plot N16 building entrances along Celebration Avenue. However, cumulatively once the proposed Plot N18/N19 RMA and public realm enhancements are built out, no wind mitigation will be required to the public realm around the Site and in the locality.
- 7.92 There is also a range of existing open space in close proximity to the Site including the Lee Valley Regional Park area and QEOP (amongst others) which are publicly accessible and provide a range of recreational, ecological and landscape benefits within walking distance of the site.
- 7.93 In summary, the proposals are considered to demonstrate a high level of compliance with planning policy requirements in relation to private and communal amenity space provision.
- 7.94 Refer to the DAS for further details on the proposed approach to landscaping, open space and public realm improvements.

### *Strategic Views*

#### *Townscape and Views*

- 7.95 Local Plan Policy BN.10 (Protecting Key Views) aims to protect key views and significant sightlines from the impacts of development proposals, which is supported by Policy HC3 (Strategic and Local Views) and Policy HC4 (LVMF) of the London Plan.

- 7.96 The site is located within the wider background of the LVMF strategic viewing corridor from King Henry VIII's Mound to St Paul's Cathedral (Assessment Point 9A.1).
- 7.97 The TVIA has been submitted with this application. With regards to St Paul's Cathedral, it outlines that the Site falls directly within the backdrop of St Paul's Cathedral in Strategic View 9A.1. The THVIA demonstrates that the proposed development would be a subtle addition to the St Paul's Drive view and would contribute to a slightly more complete and coherent backdrop. In summary, the TVIA concludes that there is a negligible impact on the heritage significance of St Paul's Cathedral overall.
- 7.98 In terms of views, the Proposed Development would perform positively in long-range, midrange and immediate townscape views. It would function as a local landmark and improve legibility in and around Victory Park.
- 7.99 Overall, the THVIA concludes the Proposed Development's high quality architectural design has the potential to greatly enhance the streetscape experience and contribute positively to the townscape of East Village and the setting of Victory Park.
- 7.100 In summary, the proposal has considered the strategic and local views as well as the LVMF and has demonstrated that the impact would be insignificant.

## Transport

- 7.101 The NPPF supports focussing significant developments in accessible locations (Paragraph 105), promoting sustainable transport modes and safe and suitable access to the site for all users (Paragraph 110). The NPPF considers that developments should prioritise pedestrian and cycle movements, minimise conflicts between pedestrians, cyclists and vehicles and allow for the efficient delivery and servicing.
- 7.102 Policy T6.1 of the London Plan requires student accommodation to be car-free apart from the provision of disabled person parking which should be designed in accordance with BS8300vol.1. LLDC Local Plan Policy T.8 supports achieving London Plan parking standards.
- 7.103 The provision of cycle parking is to be in accordance with the minimum cycle parking standards set out within Policy T5 of the London Plan.
- 7.104 The Site has a PTAL rating of Level 6b (the highest possible level – 1 being poor and 6 being excellent) and is well served by buses in the immediate vicinity. The major transport hubs Stratford Station and Stratford International Station are also located nearby within walking distance of the Site and provide tube services to Central London via the Jubilee, Central and Elizabeth lines as well as national rail services linking to the wider southeast.
- 7.105 The planning application is supported by a Transport Assessment (TA) which explains that the development is proposed to be 'car free' and 'permit free' (with the exception of one single blue badge parking bay on Liberty Bridge Road). It is predicted to achieve a mode share of approximately 98% walk/cycle/public transport, which far exceeds the 2041 target set out in the Mayor's Adopted Transport Strategy.

7.106 The TA concludes that, given the excellent public transport provision, the generated trips by each of the different modes of transport can be accommodated on the surrounding transport infrastructure with negligible impact.

7.107 The TA includes a Student Travel Plan which details the management structure for the outline area and establishes the sustainable travel principles and measures to be incorporated.

### *Servicing and Deliveries*

7.108 The Proposed Development will be served from a servicing bay on Liberty Bridge Road. The supporting Transport Assessment includes a detailed Delivery and Servicing Plan.

### *Cycle Parking*

7.109 The proposals incorporate a total of 381 long stay space cycle store at ground floor (including 19 spaces (5%) for larger cycles), accessed from the main lobby and the cycle repair space on Celebration Avenue. A further long stay space will be provided within the commercial unit on Celebration Avenue. In addition, 30 short-stay cycle parking spaces for visitors to the development are proposed along Liberty Bridge Road and Celebration Avenue.

7.110 Compliance against the is shown in Table 7-3 below.

**Table 7-3: Cycle Parking Compliance**

Use	Number	Long-Stay		Short-Stay	
		London Plan Requirement	Proposed Spaces	London Plan Requirement	Proposed Spaces
Student Bedrooms	504	0.75 spaces per bedroom = 378	382	1 space per 40 bedrooms = 13	30
Commercial Use (Class E)	332 m <sup>2</sup>	1 space per 175 m <sup>2</sup> = 2		1 space per 20 m <sup>2</sup> = 17	
Total		380	382	30	30

7.111 The TA confirms that the proposals fully meet the transport aspirations and objectives of the current strategic, regional, and local planning policies. This includes the requirements of Policies T6.1 and T6.5 of the London Plan with regard to car parking provision and London Plan Policy T5 with regard to cycle parking provision.

## **Energy and Sustainability**

### *Energy*

7.112 Paragraph 157 of the NPPF states that new development must comply with requirements for decentralised energy supplies.

- 7.113 London Plan Policy SI2 sets out carbon dioxide emissions targets, with zero carbon emissions to be achieved from 2019 for major developments for all uses. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development, with non-residential development aiming to achieve 15 per cent through energy efficiency measures.
- 7.114 London Plan Policy SI3 requires major development proposals within Heat Network Areas, such as Stratford, to have a communal low-temperature heating system.
- 7.115 London Plan Policy SI4 states that developments should minimise impacts on the urban heat island and include an energy strategy following the cooling hierarchy prioritising passive design measures over active cooling systems.
- 7.116 Regarding local planning policy, LLDC Local Plan Policy S.2 states that development should meet the regulated carbon dioxide emissions standards in the London Plan. Local Plan Policy S.2 adds that where these targets cannot be met on-site, a financial contribution to the Legacy Corporation Carbon Off-setting Fund will be required. Calculations for contributions are set out in the LLDC Carbon Offset Supplementary Planning Document (adopted August 2016).
- 7.117 A strategy to reduce overheating has also been proposed which will align with the cooling hierarchy set within London Plan Policy SI4. This is set out in detail within the Energy Statement.
- 7.118 The Energy Statement explains that while the building fabric has a significant improvement against Part L 2021 limiting factors and despite specification of high performing ventilation and lighting solutions, the overall CO<sub>2</sub> savings against Part L 2021 remains at 5% as a function of the existing district heating characteristics and Part L 2021 compliance method. This is recognised in the GLAs energy guidance and GLA instructions are that connection to DHNs in priority areas remain a priority until such times as the DHN operation is close to or at zero carbon levels.
- 7.119 Therefore, whilst the proposals could potentially achieve the 35 per cent reductions sought by Policy SI2, the priority to connect to the DHN reduces the ability to achieve these targets until the DHN operated by Equans completes its decarbonisation strategy. All options within the Site have been explored to maximise on-site reductions, as set out in the Energy Statement.
- 7.120 The commercial units will be developed to shell and core with fit-out to be undertaken by the tenant. In summary, the design complies with development plan policies.

### Sustainability

- 7.121 London Plan Policy SI7 requires major applications to submit a Circular Economy Statement promoting circular economy outcomes and aiming to achieve net zero-waste.
- 7.122 LLDC Local Plan Policy S.4 requires development to demonstrate how it will achieve the highest standards of sustainable design and construction, a minimum of BREEAM Very Good rating and a maximum score for water use.
- 7.123 A Circular Economy Statement is submitted in support of this application and sets out a wide range of interventions in developing a design approach that prioritises Circular Economy



principles and will help to reduce the material impact and waste generated by the Proposed Development.

7.124 The Sustainability Assessment Statement explains that the Proposed Development is targeting achieving an BREEAM excellent rating for the commercial/retail units.

7.125 Overall, the Circular Economy Statement and Sustainability Assessment Statement demonstrate how the detailed design will comply with the relevant adopted development plan policies and ensure the proposals incorporate a high level of sustainability.

### Urban Greening Factor

7.126 London Plan Policy G5 states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design. Consultation with the GLA confirmed that student accommodation should use the residential target Urban Greening Factor of 0.4 based on the factors set out in Table 8.2.

7.127 The landscape section of the Design and Access Statement explains that the proposals achieve an Urban Greening Factor of 0.34. Whilst not achieving the 0.4 target, the public realm is constrained by access and servicing requirements and so the proposals have sought to maximise planting opportunities where possible through a range of planting and green roofs on-site. This is also offset by an improvement of 0.08 UGF in the proposed enhancements to the public realm in Victory Park and the Belvedere, subjected to a separate detailed planning application. This approach was supported by the GLA.

7.128 Therefore, the proposals have maximised the greening on site as required by London Plan Policy G5.

### Flood Risk and Drainage

7.129 London Plan Policy SI 13 seeks for proposals to achieve greenfield run-off rates, with a preference for green over grey features, in line with the drainage hierarchy set out in the policy.

7.130 LLDC Local Plan Policy S.11 covers sustainable drainage measures and seeks to restrict the rate of surface water run-off from development sites to no greater than the equivalent for a Green Field site of an equivalent size, using sustainable drainage techniques. Policy S.11 also encourages development proposals with sustainable drainage systems that incorporate benefits for water quality and storage, efficiency, habitat and landscapes, and amenity and recreation.

7.131 A Surface Water Drainage Strategy is submitted in support of the planning application. It explains that the drainage strategy proposed for the Site continues the approach adopted by the masterplan drainage strategy for the wider SC OPP site.

7.132 The sustainable drainage strategy proposed for the Site ensures that onsite surface water will be managed by designing the developments surface water system so that no flooding will occur during storms up to and including that with an AEP of 1% with a 40% allowance for climate change and implementing appropriate pollution hazard mitigation.

7.133 The Site is located within Flood Zone 1. The Drainage Strategy draws on the Flood Risk Assessment that was previously prepared for the Site and re-affirms that the Site has a very low flood risk in respect of all flood sources.

7.134 Accordingly, the assessment concludes that the proposed design achieves the principles of sustainable drainage design set out in the NPPF in regard to surface water discharge strategy and sustainable drainage principles.

## Environment

### Environmental Effects

7.135 This section provides a summary of other environmental issues particularly relevant to planning considerations.

### *Air Quality*

7.136 London Plan Policy SI 1 'improving air quality' considers proposals as a minimum must be air quality neutral and use design solutions to prevent or minimise increased exposure to existing air pollution, with Air Quality Assessments to be submitted with major development proposals. This is supported by Local Plan Policy BN.11 which repeats the air quality considerations detailed in the London Plan.

7.137 The Air Quality Assessment confirms that construction impacts can be mitigated through appropriate best practice measures, which are set out in the Construction Environmental Management Plan. For the operational phase, the pollution concentrations are predicted to be well within relevant health-based air quality objectives at the facades of sensitive receptor on and around the Site and therefore, air quality is considered acceptable.

### Noise and Vibration

7.138 London Plan Policy D14 considers that new development should reduce, manage, and mitigate noise to improve health and quality of life.

7.139 Local Plan Policy BN.12 encourages new development to comply with policies minimising the adverse effects of noise, have regard to the London Environment Strategy (May 2018) and demonstrate compliance to the Agent of Change Principle.

7.140 The Acoustic Planning Report considers the internal noise levels, impacts from external plant and train groundbourne noise.

### *Internal Noise*

7.141 The Acoustic Planning Report confirms that the internal noise levels can be achieved consistent with BS 8233:2014 and WHO Guidelines through the provision of appropriate glazing.

### *External Plant Noise*

7.142 The Acoustic Planning Report confirms that the future proposed plant will target appropriate noise limits based on the baseline noise levels to ensure there are no unacceptable noise impacts from the development.

## **Socio-Economics**

7.143 Paragraphs 7 and 8 of the NPPF state that the achievement of sustainable development has three overarching objectives, comprising an economic role, social role and an environmental role. The economic role is to help build a strong, responsive and competitive economy. The social role is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet.

7.144 These objectives are reflected in strategic and local planning policies. LLDC Strategic Policy SP.1 sets out how the LLDC will develop a strong economy by expanding opportunities for businesses and providing additional floor space in a range of sizes, types, and forms.

7.145 The Economic Benefits Report submitted in support of the planning application identifies both social and economic benefits of the proposals.

7.146 PBSA is important to the housing market since, without it, students can put pressure on housing demand – specifically the private rented sector – crowding families and other households out. Data shows that a significant proportion of students within the private rented sector are occupying family sized homes (3+ bedrooms). The report also explains the contributions that students make to local society and the increased likelihood that students stay in the local area after graduating – helping retain skilled, young people in the host boroughs.

7.147 The proposals will contribute to economic growth, providing new jobs (both in demolition and construction and in end-use), generating economic activity (Gross Value Added) (GVA) and additional spending. Demolition and construction would support an approximate average of 260 full time equivalent (FTE) jobs over the duration of the anticipated 2 year construction programme based on the Construction Industry Training Board's (CITB) Labour Forecasting Tool. Once operational, the proposals are expected to support 30 to 40 FTE gross jobs (a net increase of 10 jobs compared to current employees accommodated on-site). The increase in gross value added (GVA) associated with the gross employment accommodated would be in the region of £2.3 to £3.3 million per annum. Further benefits would arise through local spending both by employees and students accommodated on-site. It is estimated that these groups would result in spending locally of up to £2.8 million annually.

## **Summary**

7.148 In summary, the proposals contribute towards the regeneration of Stratford and LLDC's objective to establish and maintain the area as locally distinctive neighbourhoods. The proposals provide 504 PBSA bedrooms, with 36% at affordable student rates and over 50% to be subject to a Nominations Agreement with UAL as the HEI.

- 7.149 The proposals are also consistent with the design principles of Site Allocation SA2.2, by stepping up towards Stratford International Station in the south, providing retail on the ground floor, enhancing links to community facilities, and providing additional housing.
- 7.150 The proposals form part of a wider masterplan approach to increase the floorspace on Plot N18/N19 and introduce new PBSA floorspace in this application. This approach makes the effective use of highly accessible brownfield land and enables both Plot N16 and Plot N18/N19 to be optimised consistent with the aims of the NPPF (Paragraphs 119 and 210) and London Plan Policy D3.
- 7.151 As part of this wider masterplan approach, the additional development on Plot N16 creates a unique opportunity to provide an additional public benefit through the funding of the comprehensive enhancement of key areas of public realm in the immediate vicinity of the Site.
- 7.152 These resulting public benefits include the provision of a new pavilion, enhanced planting, play space and amenity provision in Victory Park and the Belvedere, with improved pedestrian and cycle routes through the public realm and N18/N19. Proposals for the enhancement of these public realm areas are subject of a new standalone detailed planning application that will be submitted concurrently.
- 7.153 High-quality and generous shared amenity spaces are provided for students internally and externally, providing a range of spaces for students to use to study, socialise and use flexibly.
- 7.154 Extensive consultation has been undertaken with the LLDC, QRP, LLDC Members, GLA and others to ensure the proposals are of a high quality. This is supported by the endorsement from the QRP that the scheme provides exceptional architecture.
- 7.155 Supporting assessments have demonstrated that the proposals can be reasonably mitigated and that there are no potential significant effects arising from the proposed development. In particular, to surrounding amenity in relation to wind, noise, daylight, overshadowing, overlooking or noise.
- 7.156 As a result, the proposals provide a positive addition to the regeneration of the area enabling substantial enhancements to public realm in East Village in accordance with the relevant adopted development plan policy and material considerations set out in the NPPF.

# 8 Planning Obligations and Community Infrastructure Levy (CIL)

---

## Introduction

8.1 This section provides a summary of the main legislation, policy and guidance relating to planning obligations and Community Infrastructure Levy (CIL).

## National Legislation and Policy

### Community Infrastructure Levy Regulations 2010 (as amended)

8.2 Regulation 122 states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

## NPPF

8.3 These tests are also set out in Paragraph 57 of the NPPF. In paragraph 55, the NPPF states that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. It is noted that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

8.4 Paragraph 58 states that planning applications should comply with up-to-date policies setting out contributions expected from development and should be assumed to be viable. Adding that it is up to applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

## Strategic Policy and Guidance

8.5 London Plan Policy T9 seeks contributions from developments likely to add to or create congestion on London's rail network and specifies that the Mayoral CIL (MCIL) will be used to secure funding towards Crossrail 2 and other strategic transport infrastructure.

8.6 Policy T9 confirms that financial contributions will be sought to mitigate impacts from development, with such obligations and contributions including the provision of new and improved public transport services, capacity, and infrastructure.

8.7 Regarding viability, London Plan Policy DF1 explains that where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to necessary public transport improvements.

Following this they should recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

- 8.8 On 1 April 2019, the Mayor brought forward a revised CIL Charging Schedule (MCIL2) to help fund Crossrail 1 and Crossrail 2. The LLDC lies within Mayoral CIL Charging Band 2 where the rate is £60 per m<sup>2</sup>.

## Local Policy and Guidance

### LLDC Local Plan (July 2020)

- 8.9 LLDC Local Plan Policy SP.4 sets out that the LLDC will use CIL funding to help deliver the infrastructure on the CIL Infrastructure list and where appropriate and lawful, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations.

### LLDC Planning Obligations SPD (October 2022)

- 8.10 The SPD explains the interaction between CIL and S106 obligations and the potential topics and obligations that could be sought by either. Regarding S106 obligations, the following topics are sought where they are directly related to the development:

- Employment and training;
- Student housing and affordable student accommodation;
- Design Monitoring;
- Transport and highways; and
- Environmental sustainability.

### LLDC CIL Charging Schedule 2 (July 2020)

- 8.11 The LLDC implemented its CIL Charging Schedule 2 (LLDC CIL2) on 19 May 2020 which took effect from 1 July 2020, with the charging rates provided in Table 8-1 below.

Table 8-1: LLDC CIL 2 Rates

Development Type	LLDC CIL Charge (£/m <sup>2</sup> )
Student accommodation (Sui Generis)	£123.17
Comparison and other retail (A1 – A5) <sup>1</sup> and office <sup>2</sup> outside of Stratford Retail Area	Nil

<sup>1</sup> Now classed as Use Class E (a, b, and c) and Sui Generis.

<sup>2</sup> Now classed as Use Class E (g)



## CIL and Proposed Planning Obligations

### CIL Liability

8.12 The total CIL Liability for the Proposed Development for MCIL2 would be approximately £1.1m and £2.2m for LLDC CIL, equating to approximately £3.3m.

### Planning Obligations

8.13 Draft Heads of Terms are submitted as part of this application and informed by the LLDC's Planning Obligations SPD as well as pre-application discussions and relate to the following topics:

- Student Accommodation;
- Affordable Student Accommodation;
- Student Accommodation Management Plan;
- Management of Common Areas;
- Employment Skills and Training;
- Sustainability;
- Transport;
- Design Monitoring; and
- Public Realm.

## 9 Conclusions

---

- 9.1 The proposals comprise a part 18-storey, part 10-story building provided 504 PBSA bedrooms, with 33m<sup>2</sup> of Use Class E floorspace on the ground floor and associated new public open space, parking, and access.
- 9.2 This application forms part of a suite of applications submitted and to be approved concurrently to facilitate the Plot N16 development by slotting it out of the SC OPP and relevant ZMP covering the Site through the S96A application and AOD application respectively.
- 9.3 Consistent with the relevant development plan policies, 36% of bedrooms will be provided at affordable student rates and over 50% to be subject to a Nominations Agreement with UAL as the HEI.
- 9.4 The proposals provide a high level of student amenity through the provision of generous shared amenity spaces for students internally and externally, providing a range of spaces for students to use to study, socialise and use flexibly.
- 9.5 The proposals have been subject to a comprehensive pre-application process with the LLDC, QRP, LLDC Members, GLA and others to ensure they are of a high-quality. This is supported by the endorsement from the QRP that the scheme provides exceptional architecture.
- 9.6 Overall, the proposals accord with the relevant design principles of Site Allocation SA2.2 covering the Site and other relevant development plan policies relating to the proposals.
- 9.7 The proposals form part of a wider masterplan approach to maximise the remaining residential floorspace on Plot N18/N19 and introduce new PBSA floorspace in this application. This approach makes the effective use of highly accessible brownfield land and enables both Plot N16 and Plot N18/N19 to be optimised consistent with the aims of the NPPF (Paragraph's 119 and 210) and London Plan Policy D3.
- 9.8 The delivery of PBSA on Plot N16 will have a wider public benefit in the context of housing. Currently, the supply of PBSA in Stratford does not meet the demand so many students are restricted to renting homes in the local area, for example students presently occupy 54% of homes at N06. The provision of PBSA at Plot N16 will provide students with the housing they require, allowing more local people access to conventional housing in East Village.
- 9.9 This approach results in a substantial range of public benefits focussed within the public realm across Victory Park, the Belvedere, Plots N16 and N18/N19. Importantly, these benefits are only realised upon the approval and delivery of the proposals for Plots N16 and N18/N19 in full, which would allow for the investment to undertake the enhancements to the public realm.
- 9.10 Subject to the approval of this detailed planning application and the associated applications for Plot N18/N19 and public realm, the following planning and public benefits would be delivered:

- **Improvements to public realm** – both the quality and function of Victory Park and the Belvedere will be significantly refined, improved and enhanced. This will be achieved by the creation of new community spaces that inspire creativity, health and sustainable living as well as significant landscape improvements that better responds to the evolving needs of East Village residents and visitors;
- **Improvements to legibility** – the proposals will result in physical health benefits through increased walking and cycling opportunities. Improvements to legibility and the integration with pedestrian and cycling connectivity will ensure the public realm better connects with East Village as a whole and further afield towards Stratford International Station and up to the Velodrome;
- **Improvements to accessibility** – the public realm has been designed to provide an inclusive and welcoming environment to bring together existing and new communities in the LLDC administrative and the surrounding boroughs. For example, access to the Victory Park mound will be improved significantly and include a new canopy with seating and swings that can be used by disabled users;
- **Improvements to play space** – the proposals include new and improved access to outdoor space and play space for children of all ages with equal access for all residents and community members. Security across the play areas and distance to public toilets will also be improved;
- **The creation of a pavilion** – the introduction of a pavilion at the heart of East Village will help activate Victory Park. It will provide a retail kiosk/café with seating and flexible space to host a range of events for the local community. This will expand on the current community offer at East Village and strengthen social cohesion. The design of the pavilion is inspired by local context and will encourage local participation through community consultation, giving residents the opportunity to bring forward ideas on how it should take shape;
- **An area to provide civic space, activities and events** – the proposals involve the creation of a “civic centre” which will help foster sense of community and local identity as it will provide opportunities for cultural uses such as an outdoor cinema, markets, exercise programmes, and performance space to be enjoyed by the whole community for people of all ages and disabilities. This specifically responds to resident feedback which specifically highlighted the need for more amenities and activities in the public spaces; and
- **Improved biodiversity** – the proposals also result in an improved biodiversity, an increased UGF and biodiversity net gain through urban greening, trees, extensive planting, and community gardens.

9.11 In conclusion, it has been demonstrated that the proposals will provide a range of regeneration benefits, make best use of and optimise highly accessible brownfield land and diversify the housing mix of East Village to encourage mixed and balanced communities. Furthermore, a high level of student amenity will be provided within the Site, with impacts outside the Site similar to those accepted during the determination of the approved 2014 RMA. Accordingly, the proposals are consistent with the development plan policies and the NPPF and, therefore, should be approved without delay.



# Appendix 1

## N16 Planning Policy Note

---

### 1 Introduction

- 1.1 A summary of national, strategic and local planning policy and guidance relevant to the purpose-built student accommodation (PBSA) proposals for Plot N16 in East Village, Stratford (the “Site”) are set out below.
- 1.2 Relevant planning policy and guidance is set out within the following documents:

Table 1 - Summary of Relevant Planning Policy and Guidance

Policy Level	Document
National	National Planning Policy Framework (July 2021)
	National Planning Practice Guidance (March 2014)
Strategic	The London Plan – the Spatial Development Strategy for London (March 2021); (“London Plan”)
	Associated Supplementary Planning Guidance/Documents and Best Practice Guidance (See list in Section 3)
	Draft London Plan Guidance Documents (See list in Section 3)
Local	London Legacy Development Corporation (LLDC) Local Plan (July 2020) (“LLDC Local Plan”)
	LLDC Local Plan Policies Map (July 2020)
	Associated Supplementary Planning Documents (See list in Section 3)



## Note continued

### 2 National Planning Policy and Guidance

#### National Planning Policy Framework (NPPF) (July 2021)

- 2.1 In July 2021, the Government published revisions to the NPPF originally published in March 2012. The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions (Paragraph 2).

#### *Sustainable Development*

- 2.2 Paragraphs 7 and 8 of the NPPF state that the purpose of the planning system is to contribute to the achievement of sustainable development, which has the following three overarching objectives:

*“an economic role – to help build a strong, responsive and competitive economy...*

*a social role – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations...*

*an environmental role to contribute to protecting and enhancing our natural, built and historic environment...”*

- 2.3 The NPPF is underpinned by a presumption in favour of sustainable development. Paragraph 11 of the NPPF states inter alia:-

*“Plans and decisions should apply a presumption in favour of sustainable development.*

*...For decision-taking this means:*

*c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 2.4 Section 11 ‘Making effective use of land’ sets out in Paragraph’s 119 and 120 the decisions should promote an effective use of land in meeting the need for homes and other uses and should inter alia:

- *“encourage multiple benefits from both urban and rural land, including through mixed use schemes...;*



## Note continued

- *give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs..;*
- *promote and support the development of under-utilised land ...;* “

2.5 Under the subheading ‘Achieving appropriate densities’, Paragraph 124 supports development that makes efficient use of land taking into account:

- the identified need for development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area’s prevailing character and setting, or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places

### *Residential Development*

2.6 The NPPF supports the Government’s objective of significantly boosting the supply of homes, noting the importance of a sufficient amount of land coming forward where needed to address the needs of specific housing requirements (Paragraph 60). It adds that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including students (Paragraph 62).

2.7 Strategic policy-making authorities should identify suitable locations for larger scale development to help meet identified needs through opportunities presented by existing or planned investment in infrastructure and the area’s economic potential amongst other considerations. (Paragraph 73).

### *Commercial and Town Centre Uses*

2.8 Section 6 ‘Building a strong, competitive economy’, states in Paragraph 81 that decisions should help create the conditions in which businesses can invest, expand and adapt. It adds that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.9 Section 7 ‘Ensuring the vitality of town centres’ supports the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation and the positive role residential development plays in the vitality of centres (Paragraph 86).





## Note continued

2.10 Paragraph 87 states that main town centre uses, including retail, leisure, arts and cultural uses<sup>1</sup>, should be located in town centres, then in edge of centre locations.

### *Climate Change*

2.11 The NPPF encourages new development to be planned to reduce greenhouse gas emissions, such as through its location, orientation and design (Paragraph 152) as well as taking account of landform, layout, building orientation, massing and landscaping (Paragraph 153).

2.12 When determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere (Paragraph 167) and that major developments should incorporate sustainable drainage systems (Paragraph 169).

### *Transport*

2.13 Section 9 'Promoting sustainable transport' states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 105).

2.14 Paragraph 110 adds that proposals should ensure that appropriate opportunities to promote the take up of sustainable transports modes, safe and suitable access can be achieved for all users and any significant impacts to the transport network can be mitigated to an acceptable degree.

2.15 The NPPF is clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Paragraph 111).

2.16 A range of transport considerations for applications for development are set out in Paragraph 112, including to:

- a) give priority first to pedestrian and cycle movements;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

### *Design*

2.17 Section 12 of the NPPF 'Achieving well-designed places' states the creation of high quality buildings and places is fundamental to what the planning and development process should

---

<sup>1</sup> Defined in in the Glossary at Annex 2 of the NPPF.



## Note continued

achieve and that good design is a key aspect of sustainable development (Paragraph 126). Paragraph 130 states that planning decisions should ensure that developments:

- a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and.*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

2.18 Paragraph 134 states that development that is not well designed should be refused, specifically where it does not reflect local design policies and government guidance on design. It attaches great weight to:

- “a) development which reflects local design policies including guidance and supplementary planning documents such as design guides and codes; and/or*
- b) outstanding or innovative designs which promote high levels of sustainability, help raise the standard of design more generally in an area and fit in with the overall form and layout of their surroundings.”*

2.19 Section 8 ‘Promoting healthy and safe communities’ states that decisions should aim to achieve inclusive and safe places through mixed use developments, active street frontages, layouts that encourage walking and cycling and are safe and accessible (Paragraph 92).

### *The Natural Environment*

2.20 Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by measures, including providing net gains for biodiversity and preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution or land instability.



## Note continued

2.21 Paragraph 185 states that planning decisions should ensure that new development is appropriate for its locations taking into account the likely effects of pollution on health, living conditions and the natural environment. Adding that new development should mitigate and reduce to a minimum potential adverse impacts resulting from noise.

### *Decision-taking*

2.22 Paragraph 38 states that local planning authorities should approach decisions on proposed development in a positive and creative way and that decision-makers at every level should seek to approve applications for sustainable development where possible.

### *Planning Obligations*

2.23 The NPPF in Paragraph 56 states that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

2.24 It adds in Paragraph 57 that Planning obligations should only be sought where they meet all of the following tests (Set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010):

- *“Necessary to make the development acceptable in planning terms;*
- *Directly related to the development; and*
- *Fairly and reasonably related in scale in kind to the development”*

2.25 The NPPF states in Paragraph 58 that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. Adding that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

## **National Planning Practice Guidance (NPPG) (March 2014 and amended thereafter)**

2.26 On 6 March 2014, the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG) which provides supporting guidance to the NPPF.

2.27 The NPPG provides supporting guidance across a range of topics. A summary of those relevant to the Plot N16 PBSA proposals are discussed below.

### *Student Housing*

2.28 The NPPG requires strategic policy-making authorities to plan for sufficient student accommodation and to consider options to support the needs of the student population and local residents before imposing restrictions on students living outside university-provided accommodation.

2.29 The NPPG also notes that encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock.



## Note continued

2.30 Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. It notes that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock.

2.31 Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area (Reference ID: 67-004-20190722).

### *Town Centre Uses*

2.32 The guidance explains that a wide range of complementary uses can, if suitably located, help to support the vitality of town centres, including residential, employment, office, commercial, leisure/entertainment, healthcare and educational development (Reference ID: 2b-001-20190722).

### *Travel Plans, Transport Assessments and Statements*

2.33 Consistent with the NPPF, the NPPG notes that transport assessments and travel plans can result in a range of positive benefits, including sustainable travel, reduced traffic generation, reduced carbon emissions and climate impacts and improved health outcomes. (Reference ID: 42-006-20140306).

### *Air Quality*

2.34 The NPPG sets out the level of detail required for an air quality assessment and outlines that assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (Reference ID: 32-007-20191101).

### *Climate Change*

2.35 In the decision-making process, the NPPG requires local planning authorities to pay attention to integrating adaptation and mitigation approaches that support sustainable development (Reference ID: 6-004-20140612).

### *Design*

2.36 The NPPG states that good design is set out in the National Design Guide under the following 10 characteristics: context; identity; built form; movement; nature; public spaces; uses; homes and buildings; resources; and lifespan (Reference ID: 26-001-20191001).

### *Noise*

2.37 The NPPG sets out that noise needs to be considered when developments may create additional noise and when they would be sensitive to the prevailing acoustic environment. Furthermore, good acoustic design needs to be considered early in the planning process to ensure that the most appropriate and cost-effective solutions are identified from the outset (Reference ID: 30-001-20190722).

### *Use of Planning Conditions*

2.38 NPPG explains that should enable development to proceed where it would otherwise have been necessary to refuse planning permission, by mitigating the adverse effects (Reference ID: 21a-001-20140306).



## Note continued

2.39 Planning conditions should be kept to a minimum, and only used where they satisfy the following tests (Reference ID: 21a-003-20190723):

- necessary;
- relevant to planning;
- relevant to the development to be permitted;
- enforceable;
- precise; and
- reasonable in all other respects.

### *Planning Obligations*

2.40 NPPG states that planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. They must be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development (Reference ID: 23b-002-20190901, Revision date: 01.09.2019).

### *Community Infrastructure Levy*

2.41 The NPPG iterates that development over 100m<sup>2</sup> will be liable to pay Community Infrastructure Levy (CIL), except those that may be eligible for relief (Reference ID: 25-001-20190901).

2.42 The types of developments exempt from CIL, include residential annexes, self-build, social housing and charitable development so long as the relevant criteria are met (Reference ID: 25-005-20201116).

### **National Design Guide**

2.43 The National Design Guide was first published by the Government in October 2019 and updated January 2021 as planning practice guidance to ensure that all aspects of good design are considered in planning proposals. The guidance outlines the Government's priorities for well-designed places in the form of following ten characteristics:

- **Context** – enhances the surroundings.
- **Identity** – attractive and distinctive.
- **Built form** – a coherent pattern of development.
- **Movement** – accessible and easy to move around.
- **Nature** – enhanced and optimised.
- **Public spaces** – safe, social and inclusive.
- **Uses** – mixed and integrated.
- **Homes and buildings** – functional, healthy and sustainable.
- **Resources** – efficient and resilient.
- **Lifespan** – made to last.



## Note continued

### 3 The Development Plan

#### Adopted Development Plan Documents

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The planning authority that will determine the application is the LLDC. The Development Plan for the Site therefore comprises of the following documents in Table 2:

Table 2 - Development Plan Documents

Development Plan Documents
The London Plan – the Spatial Development Strategy for London (March 2021); (“London Plan”)
LLDC Local Plan (July 2020) (“LLDC Local Plan”)
LLDC Local Plan Policies Map (July 2020)

- 3.2 The London Plan was published in March 2021 and forms the overall strategic plan for London providing city wide policy and guidance for London for the period 2021 to 2041.
- 3.3 The LLDC Local Plan was adopted in July 2020 and sets out the key local policies for the future development of the borough up to 2036.
- 3.4 However, the London Borough of Newham (LBN) remains the local administrative authority for matters, including highways and environmental health.
- 3.5 The key requirements and information from development plan policies and guidance are **emboldened** for clarity.

#### Supplementary Planning Guidance Documents

- 3.6 A suite of supporting planning guidance documents have been adopted at both strategic and local level to provide further detail to specific planning policies, of which the relevant documents to the proposals are set out in Table 3 below:

Table 3 - Adopted Planning Guidance Documents

Policy Level	Adopted Planning Guidance
Strategic	London View Management Framework SPG (March 2012)
	Olympic Legacy SPG (July 2012)
	Accessible London: Achieving and Inclusive Environment Supplementary Planning Guidance (SPG) (October 2014)
	Crossrail Funding SPG (Updated March 2016)
	Be Seen Energy Monitoring Guidance (September 2021)
	Public London Charter London Plan Guidance (LPG) (October 2021)





## Note continued

	Circular Economy Statements London Plan Guidance (March 2022)
	Whole Life-Cycle Carbon Assessments London Plan Guidance (March 2022)
	Energy Assessment Guidance (June 2022)
Local	Planning Obligations Supplementary Planning Document (November 2016)
	Carbon Offset Supplementary Planning Document (August 2016)

- 3.7 Following the publication of the London Plan in March 2021, draft London Plan Guidance (LPG) documents providing further guidance on the latest London Plan policies have been prepared and published for consultation. The following emerging guidance documents in Table 4 are relevant to the proposals:

Table 4 - Emerging Planning Guidance

Policy Level	Emerging Planning Guidance
Strategic	Air Quality Neutral LPG – consultation draft (November 2021)
	Characterisation and Growth Strategy LPG – consultation draft (February 2022)
	Fire Safety LPG – consultation draft (February 2022)
	Optimising Site Capacity: A Design-led Approach LPG – consultation draft (February 2022)
	Sustainable Transport, Walking and Cycling LPG (December 2022)
	Urban Greening Factor LPG (February 2023)
Local	None

### Other Material Considerations

- 3.8 Evidence base and monitoring documents have been prepared at strategic and local level to inform planning policy and monitor against key delivery targets. These comprise the following:

Table 5 - Other Material Considerations.

Level	Document
National	Tall Buildings: Historic England Advice Note 4 (March 2022)
Strategic	GLA Annual Monitoring Report (AMR) (March 2021)
Local	LLDC Strategic Housing Market Assessment (March 2018)
	LLDC AMR 2020/2021 (July 2021)
	LLDC Housing Density Study (January 2021)
	LLDC Characterisation Study (April 2019)
	LBN: Waste Management Guidelines for Architects and Property Developers



## Note continued

- 3.9 The following sections provide a summary of the adopted Development Plan policy, guidance and material considerations relevant to the Site and proposals.



## Note continued

### 4 Principle of Development

- 4.1 This Section provides the strategic and local planning policy context to the proposals and describes the designations affecting the Site.

#### Strategic Planning Policy

*London Plan (March 2021)*

- 4.2 Policy GG2 ‘Making best use of land’ seeks to create sustainable mixed-use places that make the best use of land. **This must be achieved through enabling development of brownfield land; prioritising sites in Opportunity Areas (OA’s) and those well-connected to public transport and amenities for higher density development; and applying a design-led approach to determine the optimum development capacity of sites.**
- 4.3 Stratford is located within the Olympic Legacy OA where Policy SD1 ‘Opportunity Areas’ states that **decisions should support development which creates employment opportunities and housing choice for Londoners**, as well as wider regeneration proposals set out in Policy SD10.
- 4.4 Policy SD1 continues to state that decisions should also take account of the capacity of growth for homes and jobs as set out Table 2.1 which sets out that **the Olympic Legacy OA should provide 39,000 homes (all tenures) and 65,000 jobs.**
- 4.5 Figure 2.19 illustrates Stratford as a Strategic Area for Regeneration. Policy SD10 ‘Strategic and local regeneration’ states that development **proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers** that affect the lives of people in the area.
- 4.6 Figure A1.1 of Annex 1 shows future potential changes to the Town Centre Network and identifies Stratford’s development into an International Centre where the centre would become a globally renowned retail, leisure culture, heritage and tourism destination.

#### Local Planning Policy and Guidance

*LLDC Local Plan (July 2020)*

- 4.7 LLDC Local Plan Strategic Policy SD.1: Sustainable Development is an overarching policy relevant to all development and states:
- “When considering development proposals, the Legacy Corporation will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).”*
- 4.8 Strategic Policy SP.2 seeks to help maximise opportunities for deliver homes through delivering in excess of the 2,154 annual target from the London Plan for new homes and a 35% target for new affordable housing across the area. **Housing should also provide for a full range of sizes, tenures and specialist housing to contribute towards the overall housing mix**, with existing residential units and land to be safeguarded.
- 4.9 The LLDC Policies Map (July 2020) should be read with the Local Plan and identifies the following spatial designations that relate directly to the Site:
- Site allocation SA2.2 (East Village);



## Note continued

- Metropolitan Centre (southern part of the Site); and
- Local Centre (western part of the Site).

4.10 The Site is adjacent to or in the vicinity of the following designations:

- Local Open Space.

4.11 The extent of the above is illustrated in Figure 1 below.

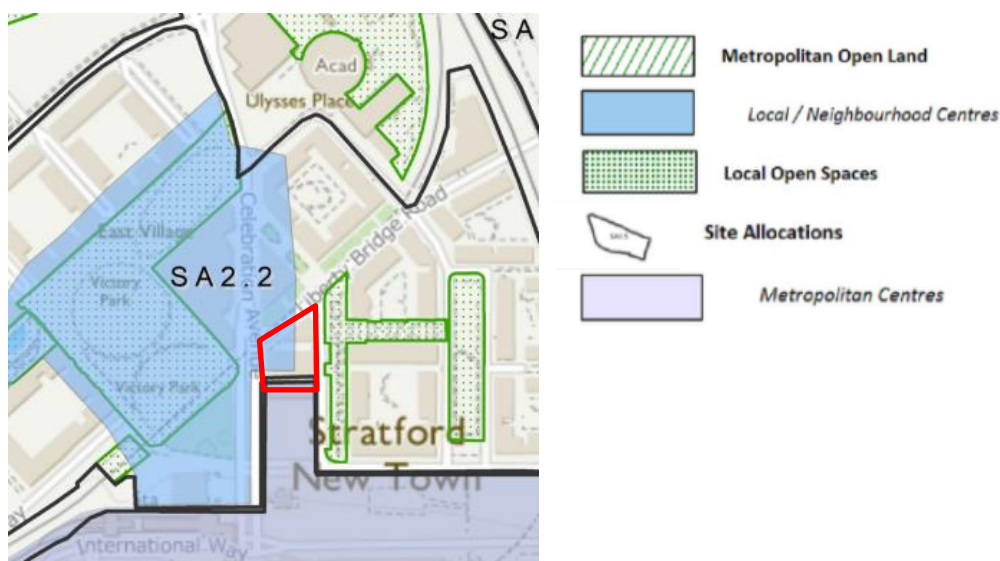


Figure 1 – Extract from the LLDC Proposals Map (Site outlined in red)

4.12 Section 11, Sub Area 2: North Stratford and Eton Manor provides details for Site Allocation SA2.2: East Village and provides the following description of what future development is appropriate within the site:

*“Family-focused, medium- to high-density residential development with public open spaces and new Local Centre. Remaining development plots provide capacity for residential development and for retail and commercial uses at ground-floor level within the Local Centre. Retail space within Local Centre not to exceed a total of 9,999 sqm.”*

4.13 The key diagram for Site Allocation SA2.2 is provided in Figure 2 below.



## Note continued

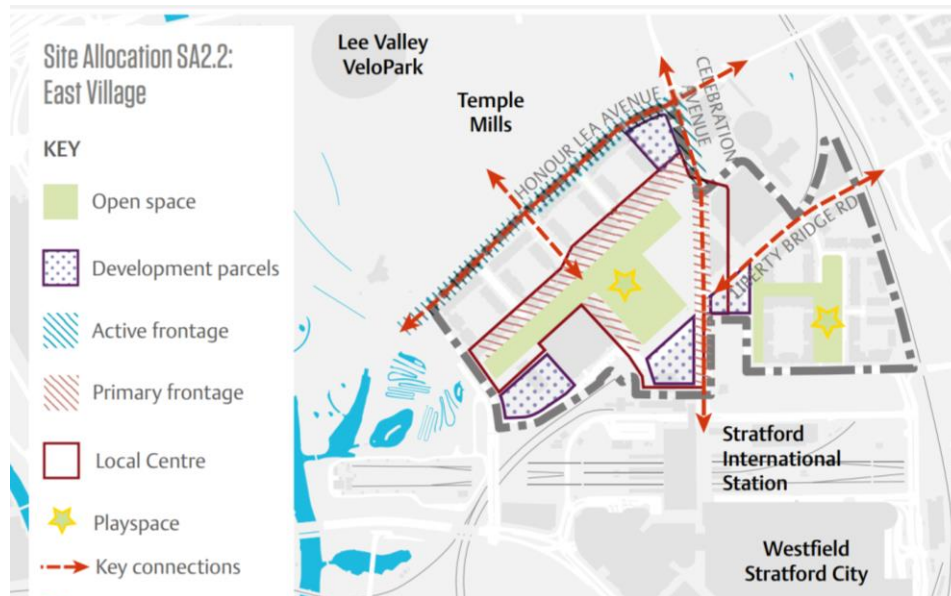


Figure 2 - Extract of Site Allocation SA2.2 Key Diagram

4.14 The Site is identified as a Development Parcel, with the relevant supporting development principles for future development in Site Allocation SA2.2: East Village provided in Table 6 below.

Table 6 - Relevant Site Allocation SA2.2 Development Principles.

Supporting Development Principles
Development around existing open space and street network
Tall buildings and higher densities in southern area close to Stratford International Station and Stratford Metropolitan Centre, medium densities and heights elsewhere
Subject to Policy 2.3, seek to provide retail and non-residential activities onto route between Stratford International Station and Chobham Manor
Ensure strong pedestrian and cycle links to Chobham Academy and Sir Ludwig Guttmann Health Centre
The site allocation is expected to yield a minimum of 1,950 new homes (gross) with affordable housing being delivered in accordance with the current planning permission.

4.15 Sub Area 2 Policy 2.3 'Local Centre and non-residential uses' defines all non-residential floorspace within the Local Centre boundary as Primary Frontage, including the Site. **Within the Local Centre future uses should support its local retail function and add to the vitality and attractiveness of the primary frontage area.**



## Note continued

### 5 Student Accommodation Use

#### Strategic Planning Policy

*London Plan (March 2021)*

- 5.1 In general, the London Plan supports new housing development, with Policy H1 ‘Increasing Housing Supply’ stating that boroughs should optimise the potential for housing delivery (for all tenures) on all suitable and available brownfield sites. In particular, sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary, such as the Site, which has a PTAL of 6b.
- 5.2 **Specific requirements and considerations for PBSA development are set out in Policy H15 ‘Purpose-built student accommodation’. This seeks to ensure local and strategic need is addressed, provided that:**
- the development contributes to a mixed and inclusive neighbourhood;
  - the use of the accommodation is secured for students
  - the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider
  - the maximum level of accommodation is secured as affordable student accommodation, with minimum provision of 35% of bedrooms (50% on public land) to follow the non-viability Fast Track Route
  - the accommodation provides adequate functional living space and layout; and
  - student accommodation is developed in in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes
- 5.3 Further clarity on student accommodation need, affordable student housing and design are provided in the supporting text and summarised below.
- 5.4 Supporting paragraph 4.15.2 explains that **the overall strategic requirement for PBSA in London has identified an annual need of 3,500 PBSA bed spaces over the Plan period.** The following paragraph 4.15.3 clarifies that the need for PBSA is not broken down into borough-level targets as:
- “...the location of this need will vary over the Plan period with changes in higher education providers’ estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding.”*
- 5.5 Affordable student accommodation is defined by the London Plan in paragraph 4.15.8 as:
- “...a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic year.”*





## Note continued

- 5.6 The Mayor defines the rental level for affordable student accommodation for the coming academic year in the Mayor's AMR. The latest version of the AMR was published in March 2021<sup>2</sup> and stated in paragraph 3.100 that **for the academic year 2018/19 the annual rental cost for affordable PBSA must not exceed £6,606**. It is assumed that this is a typing error from the previous AMR in October 2019 and this figure should refer to the 2021/2022 academic year.
- 5.7 Importantly, **there are no space standards set out for PBSA**. This is clarified in the supporting text to Policy D6 'Housing quality and standards' in paragraph 3.6.2, where it states that the space standards apply to new self-contained dwellings and by implication, not relating to other forms of non-conventional housing such as PBSA. This is also the view of the Greater London Authority (GLA) who stated the following in a February 2022 Stage 1 report for a site in LBN for a PBSA development (LBN ref: 21/02975/FUL):
- "57. ....Whilst there are no space standards for student accommodation, the development should be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity spaces."*
- 5.8 Furthermore, the supporting text in London Plan paragraph 4.15.6 explains that **the design of PBSA developments must be high quality and in accordance with the requirements of Policy D3 'Optimising site capacity through the design-led approach'** (considered further in the Design section of this note).
- 5.9 **Proposals should achieve the highest standards of accessible and inclusive design and meet the criteria set out in Policy D5 'Inclusive design'**. These include providing spaces that are designed to facilitate social interaction and inclusion, be convenient and welcoming with no disabling barriers, be able to be used easily and with dignity for all and designed to incorporate safe and dignified emergency evacuation for all.
- 5.10 Policy D7 'Accessible housing' states that **10% of dwellings should be provided in accordance with Building Regulation requirement M4(3), with paragraph 3.7.3 confirming that this requirement applies to all tenures**. Requirements relating to Building Regulation requirement M4(2) is therefore only required for residential dwellings (Use Class C3).

### Local Planning Policy

#### *LLDC Local Plan (July 2020)*

- 5.11 Policy SP.2 seeks to maximise opportunities for delivering high-quality, sustainable and affordable homes through delivering the London Plan target; maximising affordable housing through the minimum of 35% target across the area; providing a full range and tenure requirements; safeguarding existing residential units and land; and retaining existing and support new community infrastructure alongside development.

---

<sup>2</sup> [https://www.london.gov.uk/sites/default/files/amr\\_15\\_final.pdf](https://www.london.gov.uk/sites/default/files/amr_15_final.pdf)



## Note continued

- 5.12 Policy H.1 seeks to diversify the range of housing provision by securing an appropriate mix of housing and accommodation types to meet identified requirements.
- 5.13 The Local Plan Policy H.4 'Providing student accommodation' **reiterates the London Plan requirements for PBSA proposals to secure nominations agreements, meet strategic need and provide the maximum level of on-site affordable student provision.**
- 5.14 It adds that **student accommodation should be directed to appropriate locations within or on the edge of the Metropolitan Centre, such as the Site. Further consideration should also be had to facilitating a positive balance of tenure and income in the locality and have no unacceptable adverse amenity impacts.**

### Supplementary Guidance and Other Material Considerations

#### Strategic Level

##### *London Plan Evidence Base*

- 5.15 The Greater London Authority prepared the '*Student population projections and accommodation*' need paper in October 2018 to support the preparation of the latest London Plan.
- 5.16 This assessment was used to inform the 3,500 annual target for PBSA based on the projected need for a net approximate 88,000 additional PBSA bedspaces between 2016 and 2041.

##### *GLA AMR (March 2021)*

- 5.17 The latest London Plan Annual Monitoring Report (AMR) for the period 2018/2019 was published in March 2021. This provides information on approvals and delivery of student bedrooms across London and at a borough level, with Stratford Metropolitan Centre covered within the LBN.
- 5.18 Table 7 summarises the student bedroom information for London and LBN.

Table 7 - London AMR 2018/2019 Student Bedrooms Monitoring

Type	London (bedrooms)	LBN (bedrooms)	LBN %
Completions (Table 3.17)	1,759	445	25%
Approvals (Table 3.24)	3,424	524	15%
Starts (Table 3.29)	2,298	0	0%
Pipeline on 31 March 2019* (Table 3.36)	11,414	1,475	13%

\*Comprising bedrooms granted planning permission but not yet completed, including those not started and those in construction.

- 5.19 Looking at the pipeline of student bedrooms, LBN as a whole is one of the main focusses of future bedrooms providing 13% of the student accommodation alongside Brent (24% of bedrooms), Ealing (10%) and Lambeth (12%).



## Note continued

5.20 Based on the London Plan annual target of delivering 3,500 student bedrooms in PBSA's over the plan period, the current London pipeline would support delivery for the next 3.3 years, should they all be implemented.

5.21 **The current approvals London wide for the 2018/2019 monitoring period are marginally below the 3,500 bedroom target, starts and completions also lower than the 3,500 annual bedrooms target.**

5.22 **Overall, this is showing that delivery in the latest monitoring period is still not meeting the 3,500 student bedrooms target and that there is still additional capacity across London.**

### Local Level

#### *LLDC Strategic Housing Market Assessment (March 2018)*

5.23 The LLDC Strategic Housing Market Assessment (March 2018) was prepared as part of the evidence base for the latest LLDC Local Plan. This showed that based on the 2017 Population survey estimates that there are approximately 4,638 students in the area (17.7% of the total LLDC population), of which around 2,270 are living in dedicated student accommodation.

5.24 Para 6.55 explained that a net increase in bedspaces provided in specialist accommodation could take the pressure off the private rented sector and increase the overall housing stock.

#### *LLDC AMR 2020/2021 (July 2021)*

5.25 **The LLDC's latest AMR published in July 2021 for the period March 2020/2021 showed that there were 2,716 completed bedrooms and 2,312 student bedrooms to be completed in the LLDC, equating to a total of 5,028.** See table of identified schemes in **Appendix 1**.

5.26 The pipeline figures are increased by 837 bedrooms in the LLDC AMR from the 1,475 bedrooms in the London Plan AMR. This includes two new planning permissions being granted in the LLDC between the March 2019 London Plan figures and March 2021 LLDC reporting dates, which comprise an additional 182 bedrooms at Poland House and 330 bedrooms at the Former Truman Brewery Site. However, the latter is located within the London Borough of Tower Hamlets for London Plan monitoring purposes.

5.27 In addition, the LLDC AMR includes the circa 1,800 bedrooms for University College London (UCL) East approved in May 2018 under the outline planning permission (ref: 17/00235/OUT). However, it is not clear how the London AMR has considered UCL East, as the 1,800 bedrooms approved in outline would be greater than the London Plan AMR pipeline for LBN.

5.28 Figure 7 of the LLDC AMR shows how the student accommodation is distributed across the LLDC and is provided as **Appendix 2**. This shows that that the main focus of PBSA is along Stratford High Street and at UCL East, with the Unite buildings on Plot S25 and Angel Lane the only developments within Stratford City.



## Note continued

### 6 Town Centre Uses

#### Strategic Planning Policy

*London Plan (March 2021)*

- 6.1 The London Plan in Policy SD6 'Town Centres and high streets' **supports the enhancement of the vitality and viability of town centres to meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses.**
- 6.2 Policy SD8 'Town centre network' sets out the hierarchy of town centre uses. The policy considers that **Metropolitan centres, such as Stratford, should secure opportunities for higher density employment, leisure and residential development** in a high-quality environment. **Local centres like East Village should focus on providing local goods and services well accessed by walking and cycling.**

#### Local Planning Policy

*LLDC Local Plan (July 2020)*

- 6.3 Strategic Policy SP.1 of the LLDC Local Plan **seeks to expand opportunities for businesses and promotion of cultural, tourist and leisure expansion and supporting higher and further education expansion.** This is to be achieved through strengthening the local economic profile of the area by providing additional floorspace in a range of sizes, types and forms.
- 6.4 Table 4 of the LLDC Local Plan explains that **the function of East Village is to provide small-scale retail and office uses serving a localised catchment, with residential development on upper storeys across the site.**
- 6.5 Policy B2 'Thriving town, neighbourhood and local centres', **seeks to protect the function of each centre by maintaining appropriate A1 retail presence, maintenance of active retail frontages and promoting residential development in all centres to optimise housing delivery.**



## Note continued

### 7 Design

#### Strategic Planning Policy

London Plan (March 2021)

- 7.1 The London Plan **encourages development to optimise site capacity through a design-led approach, with higher density developments promoted in well-connected locations** according to Policy D3 ‘Optimising site capacity through the design-led approach’. The policy sets out a range of design considerations, which are summarised in Table 8 below:

Table 8 - Policy D3 Design Considerations

Topic	Considerations
Form and Layout	Enhancing local context and positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape
	Encouraging and facilitating active travel and inclusive pedestrian and cycling routes that are aligned with peoples’ movement patterns and desire lines in the area
	Being street-based with clearly defined public and private environments
	Facilitating efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users
Experience	Achieving safe, secure and inclusive environments
	Providing active frontages and positive relationships between the activities inside the buildings and outside in the public realm
	Delivering appropriate outlook, privacy and amenity
	Providing conveniently located green and open spaces for social interaction, play, relaxation and physical activity
	Helping prevent or mitigate the impacts of noise and poor air quality
	Achieving indoor and outdoor environments that are comfortable and inviting for people to use
Quality and Character	Responding to the existing character by identifying the characteristics that are unique to the locality and utilise the heritage assets and architectural features that contribute towards the local character
	Being of high quality, and considers the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
	Providing spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

- 7.2 Further design considerations are set out in London Plan Policy D4 ‘Delivering good design’, which explains the design of **proposals should be thoroughly scrutinised by planning, design and conservation officers and make use of the design review process**. The policy further considers that **proposals should retain the design quality through to completion**



## Note continued

through providing the maximum detail appropriate to avoid the need for later amendments and to avoid deferring the assessment of design.

- 7.3 Policy D8 'Public realm' encourages the provision of new public realm where appropriate and considers that the **public realm design should be well-designed, safe, accessible, inclusive and use good quality materials, amongst other considerations.**

### Local Planning Policy

#### Local Plan (July 2020)

- 7.4 Strategic Policy SP.3 'Integrating the natural, built and historic environment', sets out the LLDC's approach to Design. New development should contribute to a high-quality built and natural environment.
- 7.5 Policy BN.1 'Responding to place', states that proposals will be considered acceptable where they respond to place in accordance with the principles set out in Table 9 below:

Table 9 - Policy BN.1 Design Criteria.

Topic	Considerations
1. Landscape and water	Relate well to the local area's defining natural and man-made landscape features, in particular the linear form of the waterways and parklands
2. Urban fabric	Respect existing typologies, including those of heritage value, and draw design cues from the form of the area in terms of its layout (urban structure and grain) and scale (height and massing)
3. Architectural and historic context	Enhance the architectural and historic setting within which development is proposed. Careful consideration should be given to architectural and historic style, materials, fenestration, colour, building orientation, datums and overall appearance
4. Connectivity	Facilitating efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users
5. Infrastructure	Make use of existing physical infrastructure to help overcome barriers to integration and to create new links and routes
6. Mix	Consider how proposed uses integrate with, and relate to, both public and private space;
7. Amenity and wellbeing	Minimise impact within proposed and upon existing development, by preventing overshadowing, and an unacceptable provision/loss of sunlight, daylight or privacy

- 7.6 Policy BN.4 'Designing Development', states that the design of all mixed use and residential developments should:





## Note continued

Table 10 – BN.4 Design Considerations

Criteria	Considerations
8.	Respect the scale and grain of their context
9.	Relate well to street widths and make a positive contribution to the streetscape
10.	Generate an active street frontage
11.	Incorporate sufficient, well designed and appropriately located communal and private amenity space
12.	Contribute to defining any existing or identified new public routes and spaces
13.	Promote legibility of the site
14.	Where relevant, preserve or enhance heritage assets and the views to/from these, and contribute positively to the setting of heritage assets, including conservation areas

7.7 Non-residential proposals are considered acceptable by Policy BN.6 where they respond to the needs of all users by incorporating the LLDC Inclusive Design Standards.

### Strategic Guidance

*Accessible London: Achieving and Inclusive Environment (October 2014)*

7.8 The Accessible London SPG provides guidance on relevant London Plan Policies at the time of publication, these have since been replaced by the policies in the current March 2021 version of the London Plan. The guidance relates to accessibility and inclusive design and considerations, including lifetime neighbourhoods, public realm, play facilities and housing.

*Public London Charter (September 2021)*

7.9 The Public London Charter (the Charter) consists of eight principles that set out the rights and responsibilities for the users, owners and managers of new public spaces and provides further guidance to London Plan Policy D8 'Public Realm'. These principles comprise:

- Public welcome;
- Openness;
- Unrestricted use;
- Community focus;
- Free of charge;
- Privacy and data;
- Transparency; and
- Good stewardship.

7.10 Applicants should demonstrate how a proposed scheme that includes public space will meet the requirements of the Charter principles through a management plan, which is recommended to be secured through a legal agreement linked to any planning permission.



## Note continued

### Local Guidance

*LBN Waste Management Guidelines for Architects and Property Developers*<sup>3</sup>

- 7.11 LBN's guidance sets out the waste storage and services requirements for proposals within LBN, including the Site. These requirements will need to be achieved through the detailed proposals for the Site.

---

<sup>3</sup> <https://www.newham.gov.uk/downloads/file/632/wastemanagementguidelinesarchitectspropertydevelopers>



## Note continued

### 8 Tall Buildings

#### Strategic Planning Policy

*London Plan (March 2021)*

- 8.1 London Plan Policy D9 ‘Tall Buildings’ in Part B considers that **the location of tall buildings should be identified with appropriate heights for tall buildings in development plans.**
- 8.2 **Part C sets out design criteria for the assessment of proposals for tall buildings, taking account of the visual, functional, environmental and cumulative impacts of the buildings, including:**

Table 11 - Policy D9 Design Criteria.

Topic	Considerations
Visual Impacts	The views of buildings from different distances need to be considered, as well as long-range, mid-range and immediate views
	Tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
	Architectural quality and materials should be of an exemplary standard
	Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings
	Buildings should not cause adverse reflected glare and minimise light pollution from internal and external lighting
Functional Impacts	The internal and external design and its emergency exit routes must ensure the safety of all occupants
	Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm
	Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use
	It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building
	Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area and the role of the development as a catalyst for further change in the area
	Buildings, including their construction, should not interfere with aviation, navigation or telecommunication and solar energy generation on adjoining buildings
Environmental Impacts	Noise, Air Quality, Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces



## Note continued

8.3 Part D of the Policy seeks that **publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.**

8.4 London Plan Policy HC3 'Strategic and Local Views' sets out that **development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.** This includes Strategic View 9A.1 from Richmond Park to St. Paul's Cathedral where some buildings in Stratford could be visible in the background of the view. Policy HC4 'London View Management Framework' criterion 3) of Policy HC4 Part F clarifies how proposals in the background of the view should be considered, noting that:

"...development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not".  
*[Emphasis added]*

### Local Planning Policy

*LLDC Local Plan (July 2020)*

8.5 Policy BN.5 'Proposals for Tall Buildings', states that **tall buildings should be located within the centre boundaries, in order of hierarchy, with Stratford Metropolitan Centre the top of this hierarchy. Tall buildings will be considered acceptable where they exhibit exceptionally good design.** To achieve this, proposals must demonstrate the achievement of the following design criteria in Table 12:

Table 12 - Policy BN.5 Tall Buildings Design Criteria.

Criteria	Considerations
1.	An appropriate proportion, form, massing, height and scale in context with the character of its surroundings
2.	Use of material appropriate to the height of the building
3.	Acceptable access and servicing arrangements
4.	A positive contribution to the public realm at ground level
5.	A positive contribution to the surrounding townscape
6.	Creation of new or an enhancement to existing views, vistas and sightlines where there is an opportunity to do so



## Note continued

- 8.6 Policy BN.10 considers that **developments within key views shown in Figure 18 of the Local Plan, should make a positive contribution to the characteristics and composition of that view.** Policy BN.10 adds that proposals should take account of view 9 of the LVMF (March 2012). An extract of Figure 18 is provided in Figure 3 below.

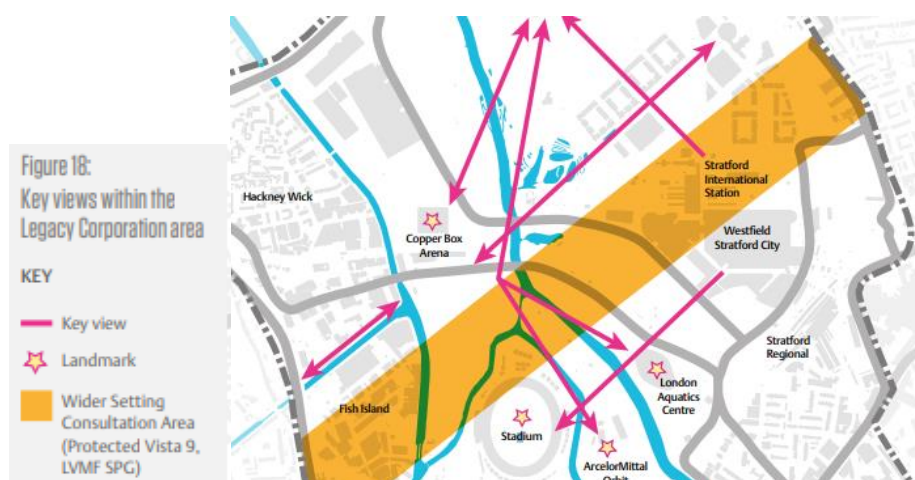


Figure 3 – Extract from Local Plan Figure 18.

### Supplementary Guidance and Other Material Considerations

#### *London View Management Framework (March 2012)*

- 8.7 The purpose of the London View Management Framework (LVMF) is to explain the policy approach to protected views in the London Plan in greater detail and to classify protected views into four categories.
- 8.8 Stratford lies in the background behind the Wider Setting Consultation Area (WSCA) in the linear view 9: King Henry VII's Mound, Richmond to St Paul's Cathedral. The extent of the WSCA is shown in yellow and the viewing corridor shown in red in the extract from Figure 8.1 shown in Figure 2.



Figure 4 - Linear View 9 Protected Vista Plan (viewing corridor in red and WSCA in yellow).

- 8.9 The Framework protects the view by stating that Development that exceeds the threshold plane of the WSCA of the Protected Vista in the background should preserve or enhance the viewer's ability to recognise and appreciate the dome of the Cathedral. **In determining applications, development in the background of the view should be subordinate to the Cathedral and that the clear sky background profile of the upper part of the dome remains.**



## Note continued



Figure 5 - Telephoto view of Linear View 9 Protected Vista (viewing corridor in red and WSCA in yellow).

8.10 Paragraph 67 regards development within the background of Linear Views and explains that:

*“Whether a development proposal falls inside the Wider Setting Consultation Area of a Protected Vista or not, it should not harm the composition of the view, and where possible, should contribute positively to the relationship between the landmark and the associated landscape or townscape elements of the Linear View.”*

### *LLDC Density Study*

8.11 The LLDC Density Study was prepared to support the housing delivery in the LLDC as part of a suite of measures set out in the August 2019 Housing Delivery Test Action Plan following under delivery of housing in the period up to February 2019.

8.12 Across Sub-Area 2 (North Stratford and Eton Manor) (page 22), it explains that the buildings are predominantly medium density, grouped along open space and approximately ten storeys high.

8.13 Figure 44 within the Density Study comprises a Density Map of the LLDC area (see Figure 6 below). This shows higher densities in darker colours and identifies the developments surrounding the Site as high density, with the highest densities focussed around Stratford International Station.

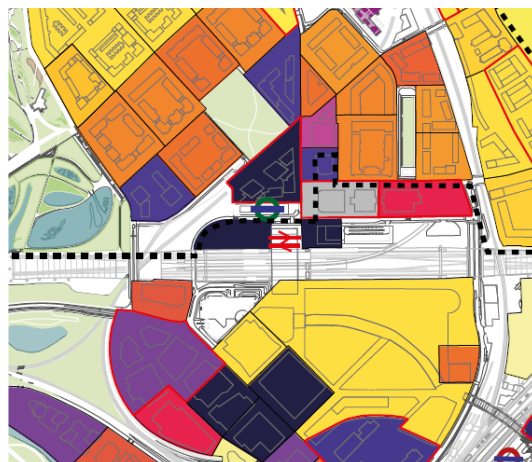


Figure 6 - Density Map from the LLDC's Density Study

8.14 The Density Study provides floor area ratios (FAR) for each Plot, with a **FAR of 2.5-2.75 provided for Plot N16** based on the approved RMA, in comparison to the highest FAR in the





## Note continued

Sub Area of 5.75+ at N18/N19. Across Sub Area 2 the average FAR is 1.94, reflecting the lower density developments in the north, including Chobham Manor.

### *LLDC Characterisation Study*

- 8.15 The LLDC Characterisation Study (2018) was prepared to help inform the LLDC Local Plan review and describes the emerging characteristics of the different Sub Areas. For Sub Area 2 covering the Site, on page 25 it states that:

*“Approved planning consents for the remaining development plots in the south will introduce a cluster of higher-rise blocks, capitalising on the high public transport accessibility in this area. This will provide a transition into the predominantly high-rise developments within the Metropolitan Centre to the south.”*

- 8.16 Figure 2.4 of the study identifies Plot N16 as appropriate for building heights between 12-19 storeys, as shown in the extract in Figure 7 below.



Figure 7 - Extract from LLDC Characterisation Study (Plot N16 outlined in red).

### *Tall Buildings: Historic England Advice Note 4 Second Edition (March 2022)*

- 8.17 Historic England’s advice note is intended to support the implementation of relevant legislation, national planning policy and guidance. The advice note provides guidance on how to set tall buildings policies, as well as considerations for the design and determination of tall buildings proposals.
- 8.18 In paragraph 5.10 it notes that developing tall buildings in the right locations and at the right heights can have a positive influence on place-shaping with minimal or no impact on the historic environment. However, it acknowledges that there may be some circumstances where potential impacts on the historic environment will occur and recommends a range of mitigation measures involving:
- Locating taller elements of a development on less sensitive parts of a site, by carefully considering layout;



## Note continued

- Creating a human scale experience by setting tall buildings back from the street and/or ensuring that the base of the tall building enhances or better reveals heritage assets, historic street patterns and spaces;
- Designing the tall building to be sympathetic within the local context using materials, massing, and discrete or subtle architectural and functional features;
- Minimising the bulk of tall buildings, especially at their tops, to help reduce the overall perception of mass; and
- Designing the tall building to take account of the profile and silhouette of a cluster, and prominence of the cluster within the historic town or cityscape.



## Note continued

### 9 Transport

#### Strategic Planning Policy

London Plan (March 2021)

- 9.1** Development should make the most effective use of land, reflecting its connectivity and accessibility by public transport, walking and cycling routes, and mitigate any impacts on London’s transport networks as set out by London Policy T1 ‘Strategic approach to transport’.
- 9.2** Policy T2 ‘Healthy Streets’ states development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. These are set out in Transport for London’s Healthy Streets for London Guidance<sup>4</sup>.
- 9.3** Minimum cycle parking standards are set out in London Plan Policy T5 ‘Cycling’ and supporting Table 10.2. The policy adds that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards<sup>5</sup>. London Plan Figure 10.3 identifies LBN as a Borough where higher minimum cycle standards apply.
- 9.4** Figure 8 below provides relevant extracts from London Plan Table 10.2, with the higher cycle parking standards for short-stay spaces to applying to the Site.

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)	Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A1	food retail above 100 sqm	1 space per 175 sqm gross external area (GEA)	areas with higher cycle parking standards (see Figure 10.3): <ul style="list-style-type: none"> <li>first 750 sqm: 1 space per 20 sqm;</li> <li>thereafter: 1 space per 150 sqm (GEA)</li> </ul> rest of London: <ul style="list-style-type: none"> <li>first 750 sqm: 1 space per 40 sqm;</li> <li>thereafter: 1 space per 300 sqm (GEA)</li> </ul>	A2-A5	financial / professional services; cafes & restaurants; drinking establishments; take-aways above 100 sqm	1 space per 175 sqm (GEA)	areas with higher cycle parking standards (see Figure 10.3): <ul style="list-style-type: none"> <li>1 space per 20 sqm (GEA)</li> </ul> rest of London: <ul style="list-style-type: none"> <li>1 space per 40 sqm (GEA)</li> </ul>
	non-food retail above 100 sqm	<ul style="list-style-type: none"> <li>first 1000 sqm: 1 space per 250 sqm</li> <li>thereafter: 1 space per 1000 sqm (GEA)</li> </ul>	areas with higher cycle parking standards (see Figure 10.3): <ul style="list-style-type: none"> <li>first 1000 sqm: 1 space per 60 sqm;</li> <li>thereafter: 1 space per 500 sqm (GEA)</li> </ul> rest of London: <ul style="list-style-type: none"> <li>first 1000 sqm: 1 space per 125 sqm;</li> <li>thereafter: 1 space per 1000 sqm (GEA)</li> </ul>	B1	business offices	<ul style="list-style-type: none"> <li>areas with higher cycle parking standards (see Figure 10.3): 1 space per 75 sqm</li> <li>rest of London: 1 space per 150 sqm (GEA)</li> </ul>	<ul style="list-style-type: none"> <li>first 5,000 sqm: 1 space per 500 sqm</li> <li>thereafter: 1 space per 5,000 sqm (GEA)</li> </ul>
					light industry and research and development	1 space per 250 sqm (GEA)	1 space per 1000 sqm (GEA)
				D2	sports (e.g. sports hall, swimming, gymnasium, etc.)	1 space per 8 FTE staff	1 space per 100 sqm (GEA)
					other (e.g. cinema, bingo, etc.)	1 space per 8 FTE staff	1 per 30 seats
				Student accommodation		0.75 spaces per bedroom	1 space per 40 bedrooms

Figure 8 - London Plan Cycle Parking Standards.

<sup>4</sup> <https://content.tfl.gov.uk/healthy-streets-for-london.pdf>

<sup>5</sup> <https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>



## Note continued

- 9.5 Car parking considerations and standards are set out in London Plan Policies Policy T6 and T6.1-T6.5.
- 9.6 Policy T6 'Car parking' states that **car-free development should be the starting point for proposals in places that are well-connected by public transport, such as Stratford**. It adds that **adequate provision should be made for efficient deliveries and servicing and emergency access and requires a Parking Design and Management Plan to be submitted** alongside all applications which include car parking provision.
- 9.7 Residential car parking standards and considerations, including student accommodation is set out in Policy T6.1 'Residential parking', which seeks that:
- **Student accommodation should be car-free;**
  - **Disabled persons parking should be provided for residential development, for residents use, bays, designed in accordance with BS8300vol.1 and located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core;**
  - **Residential car parking spaces must provide at least 20 per cent of spaces with active electric vehicle charging facilities, with passive provision for all remaining spaces.**
- 9.8 London Plan Policy T6.3 'Retail parking' and supporting Table 10.5 set out that **proposals in locations with a PTAL of 5-6 i.e. Stratford, should be car-free, except for disabled persons parking, with any parking making provision for rapid electric vehicle charging.**
- 9.9 London Plan Policy T6.5 'Non-residential disabled persons parking' and supporting Table 10.2 set out proposed levels for disabled persons parking and confirms that **all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.**

### Local Planning Policy

#### *LLDC Local Plan (July 2020)*

- 9.10 Policy T.4 promotes sustainable transport choices and minimising reliance on the private car to ensure that the development of the legacy area is optimised. It seeks to achieve this through prioritising pedestrians and cyclists, **expecting development to maximise opportunities to improve connectivity and include satisfactory arrangements for car clubs, facilities for electric vehicle charging and stands for cycle hire, where appropriate.**
- 9.11 The policy also requires **major new development will need to demonstrate how its construction impact will be managed through a Construction Management Plan and how, once operational, servicing and deliveries will be managed through Delivery and Servicing.**
- 9.12 Design considerations are provided in Policy T.6 'Facilitating local connectivity', where it explains that **developments should be designed to integrate into the area and facilitate improvements to local connectivity**, within the development site and across the LLDC area. This is supported by Policy T.9 'Providing for pedestrians and cyclists', which **promotes the**



## Note continued

**provision of safe routes for walking and cycling within its area that connect well with local destinations.**

**9.13** Policy T.7: ‘Transport Assessments and Travel Plans’ requires **proposals for development that would be referable to the Mayor of London to submit a Transport Assessment and Travel Plan with the planning application.**

**9.14** The LLDC Local Plan seeks to **achieve London Plan parking standards in new proposals**, as set out in Policy T.8: Parking and parking standards in new development. In addition to the requirements in the London Plan, the policy also requires that **proposals including car parking should consider the following:**

- **Aim for car-free development as the starting point;**
- **Be provided in a way that is appropriate to the existing and proposed character and form of the built environment and, where provided off-street, does not compromise other potential street-level uses or dominate street frontages; and**
- **Not take precedence over the incorporation of open space, public realm or amenity space within and around the development.**



## Note continued

### 10 Energy and Sustainability

#### Strategic Planning Policy

*London Plan (March 2021)*

- 10.1 London Plan Policy SI2 'Minimising greenhouse gas emissions' **requires major developments to be net zero-carbon in accordance with the following energy hierarchy:**
- **Be lean: use less energy and manage demand during operation**
  - **Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly**
  - **Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site**
  - **Be seen: monitor, verify and report on energy performance.**
- 10.2 In addition, London Plan Policy SI3 'Energy infrastructure', **requires major development proposals within Heat Network Areas, such as Stratford, to have a communal low-temperature heating system.**
- 10.3 London Plan Policy SI4 'Managing heat risk', **encourages proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.** It further considers that major development proposals should provide an energy strategy demonstrating how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy detailed in the policy.
- 10.4 'Water Infrastructure' is considered in London Plan Policy SI5, which seeks that **commercial development should achieve at least the BREEAM excellent standard for the 'Wat 01' or equivalent. For residential development proposals should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption).**
- 10.5 London Plan Policy SI7 'Reducing waste and supporting the circular economy' **requires major applications to submit a Circular Economy Statement promoting circular economy outcomes and aiming to achieve net zero-waste.**

#### Local Planning Policy

*LLDC Local Plan (July 2020)*

- 10.6 Strategic Policy SP.5 'A sustainable and healthy place to live and work' sets out the Council's aims to achieve a sustainable future, which are reflected in the detailed policies on energy and sustainability in the Local Plan.
- 10.7 Policy S.1 'Health and wellbeing', states that **major development schemes will be required to show how schemes contribute to health and wellbeing through information on access to schools, health services, community activities, leisure activities, shops and services, and public open spaces.**
- 10.8 'Energy in new development' is covered by Policy S.2, which **expects developments to meet the zero-carbon targets in the London Plan. Where these targets cannot be met on site,**





## Note continued

a financial contribution to the Legacy Corporation Carbon Off-setting Fund will be required in accordance with the Legacy Corporation Carbon Offset Supplementary Planning Document (adopted August 2016).

- 10.9 Major development should demonstrate that opportunities to connect to existing energy networks in the LLDC area have been maximised according to Policy S.3 'Energy infrastructure and heat networks'. The policy goes on to explain that this should be through the provision localised network connections and heating and cooling network infrastructure within buildings, where it is viable to do.
- 10.10 Policy S.4 'Sustainable design and construction' requires developments to achieve the highest standards of sustainable design and construction, with non-domestic space within development required to achieve a minimum of BREEAM Very Good, and a maximum score for water use.
- 10.11 Further to the water usage reductions in London Plan Policy SI5, Policy S.5 'Water supply and waste water disposal' requires major development proposals to demonstrate that there is sufficient existing or planned water infrastructure capacity to meet the demands of the development.

### Strategic Guidance

*Be Seen Energy Monitoring Guidance (September 2021)*

- 10.12 The 'Be Seen' energy monitoring guidance explains how developers and owners of new major developments should monitor and report actual operational energy performance to comply with London Plan Policy SI 2, i.e. the 'be seen' element of the energy hierarchy.
- 10.13 It provides information on the reporting templates applicants will need to use to report to the GLA and should be read when preparing Energy Statements.

### Local Guidance

*LLDC Carbon offset SPD (August 2016)*

- 10.14 The SPD sets out guidance supporting Local Plan Policy S.2 and how carbon offsetting costs will be calculated and spent.
- 10.15 It states that where buildings do not meet carbon reduction targets and there is a carbon gap, an abatement of carbon emissions will be sought over a 30 year period based on £60 per tonne (indexed).



## Note continued

### 11 Environment and Flood Risk

#### Strategic Planning Policy

##### *London Plan (March 2021)*

- 11.1 London Plan Policy SI 1 'Improving air quality', considers **proposals as a minimum must be air quality neutral** and use design solutions to prevent or minimise increased exposure to existing air pollution, with Air Quality Assessments to be submitted with major development proposals.
- 11.2 London Plan Policy SI 13 'Sustainable drainage' seeks for **proposals to achieve greenfield run-off rates, with a preference for green over grey features**, in line with the drainage hierarchy set out in the policy.
- 11.3 London Plan Policy D14 'Noise' considers new **development should reduce, manage and mitigate existing and potential adverse impacts on noise** to improve health and quality of life, improve and enhance the acoustic environment and promote new technologies and improved practices to reduce noise at source.
- 11.4 'Urban greening' targets are set out in London Plan Policy G5. Whilst there is no specific reference to PBSA, the **Urban Greening Factor target of 0.4 for predominantly residential is considered to be the most relevant to PBSA due to the residential nature of the building**. The policy explains that urban greening can be achieved by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 11.5 Policy G6 'Biodiversity and access to nature' states that **development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain**.

#### Local Planning Policy

##### *LLDC Local Plan (July 2020)*

- 11.6 The biodiversity net gain aims in London Plan Policy G8's are reiterated in Policy BN.3 'Maximising biodiversity'.
- 11.7 Similarly, Policy BN.11 'Air quality' repeats the air quality considerations set out in London Plan Policy SI1.
- 11.8 Policy BN.12 'Noise, encourages new development to minimise exposure to adverse impacts of noise, through compliance with the relevant policies in the London Plan and having regard to the London Environment Strategy (May 2018).
- 11.9 'Overheating and urban greening' are considered in Policy S.9. This **requires planning applications for major development schemes to set out the measures included to avoid overheating (including overheating analysis against a mid-range climate scenario for the 2030s) and excessive heat generation and, where appropriate, to maximise urban greening**.
- 11.10 Policy S.11 'Sustainable drainage measures and flood protections', **adds support for sustainable drainage systems that have benefits for water quality and storage, efficiency, habitat and landscapes and amenity and recreation** in addition to the requirements set out in London Plan Policy SI13.



## Note continued

### 12 Archaeology

#### Strategic Planning Policy

*London Plan (March 2021)*

- 12.1 Policy HC1 'Heritage Conservation and Growth' states development proposals affecting heritage assets should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.

#### Local Planning Policy

*LLDC Local Plan (July 2020)*

- 12.2 Figure 19 identifies that whilst the majority of the LLDC area is within an Archaeological Protection Zone, **most of East Village is excluded, including the Plot N16 site (see Figure 7 below) and therefore, the considerations of the policy are not relevant to the Site.**

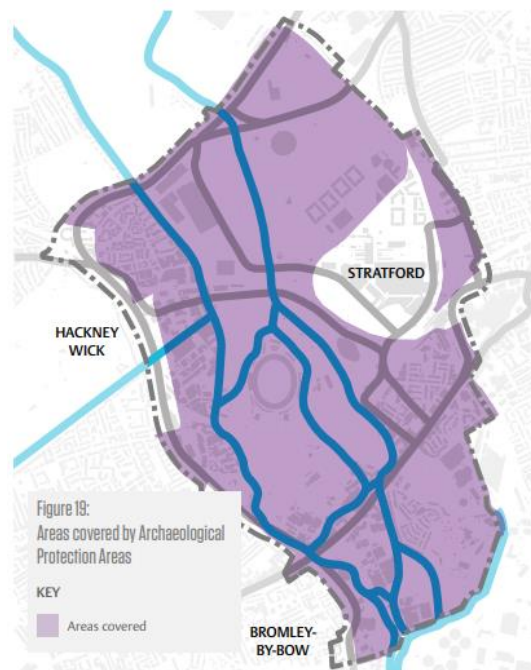


Figure 9 - Figure 19 of the LLDC Local Plan.



## Note continued

### 13 Planning Obligations and Community Infrastructure Levy (CIL) Community Infrastructure Levy Regulations (2010) (as amended)

13.1 Regulation 122 (Limitation on use of planning obligations) states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is:

*“(a) necessary to make the development acceptable in planning terms;*

*(b) directly related to the development; and*

*(c) fairly and reasonably related in scale and kind to the development.”*

#### Strategic Planning Policy

*London Plan (March 2021)*

13.2 Policy T9 confirms that **financial contributions will be sought to mitigate impacts from development**, with such obligations and contributions including the provision of new and improved public transport services, capacity and infrastructure.

13.3 Policy DF1 explains that where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly **apply priority to necessary public transport improvements**. Following this they should recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

*MCIL2 Charging Schedule (January 2019)*

13.4 MCIL2 came into effect on 1 April 2019. **The LLDC is within Band 2 which charges £60 per sqm for all developments**. MCIL2 will be used to fund Crossrail 1 (the Elizabeth Line) and Crossrail 2.

#### Local Planning Policy

*LLDC Local Plan (July 2020)*

13.5 Local Plan Policy SP.4 sets out that the LLDC will use CIL funding to help deliver the infrastructure on the CIL Infrastructure list and where appropriate and lawful, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations.

*LLDC CIL Charging Schedule (July 2020)*

13.6 The LLDC implemented its CIL Charging Schedule 2 (LLDC CIL2) on 19th May 2020 which took effect from 1st July 2020. The charging rates are provided in Table 13 below.



## Note continued

Table 13 – LLDC CIL Charging Schedule (July 2020) for relevant uses.

Development Type	LLDC CIL Charge (£/m <sup>2</sup> )
Student accommodation (Sui Generis)	£123.17
Convenience supermarkets and superstores and retail warehouses (over 1000 m <sup>2</sup> )	£123.17
All other uses (outside of 'Stratford Retail Area') except education, healthcare and affordable workspace	£20
Education, healthcare and affordable workspace	Nil

13.7 As a result of the Site being located outside of the defined 'Stratford Retail Area', CIL rates for retail, office and community uses fall within the 'all other uses' category and rates.

### Supplementary Guidance and Other Material Considerations

#### *LLDC Planning Obligations SPD (October 2022)*

13.8 The SPD explains the interaction between CIL and S106 obligations and the potential topics and obligations that could be sought by either. Regarding S106 obligations, the following topics are sought where they are directly related to the development:

- Employment and training;
- Student housing and affordable student accommodation;
- Design Monitoring;
- Transport and highways; and
- Environmental sustainability.

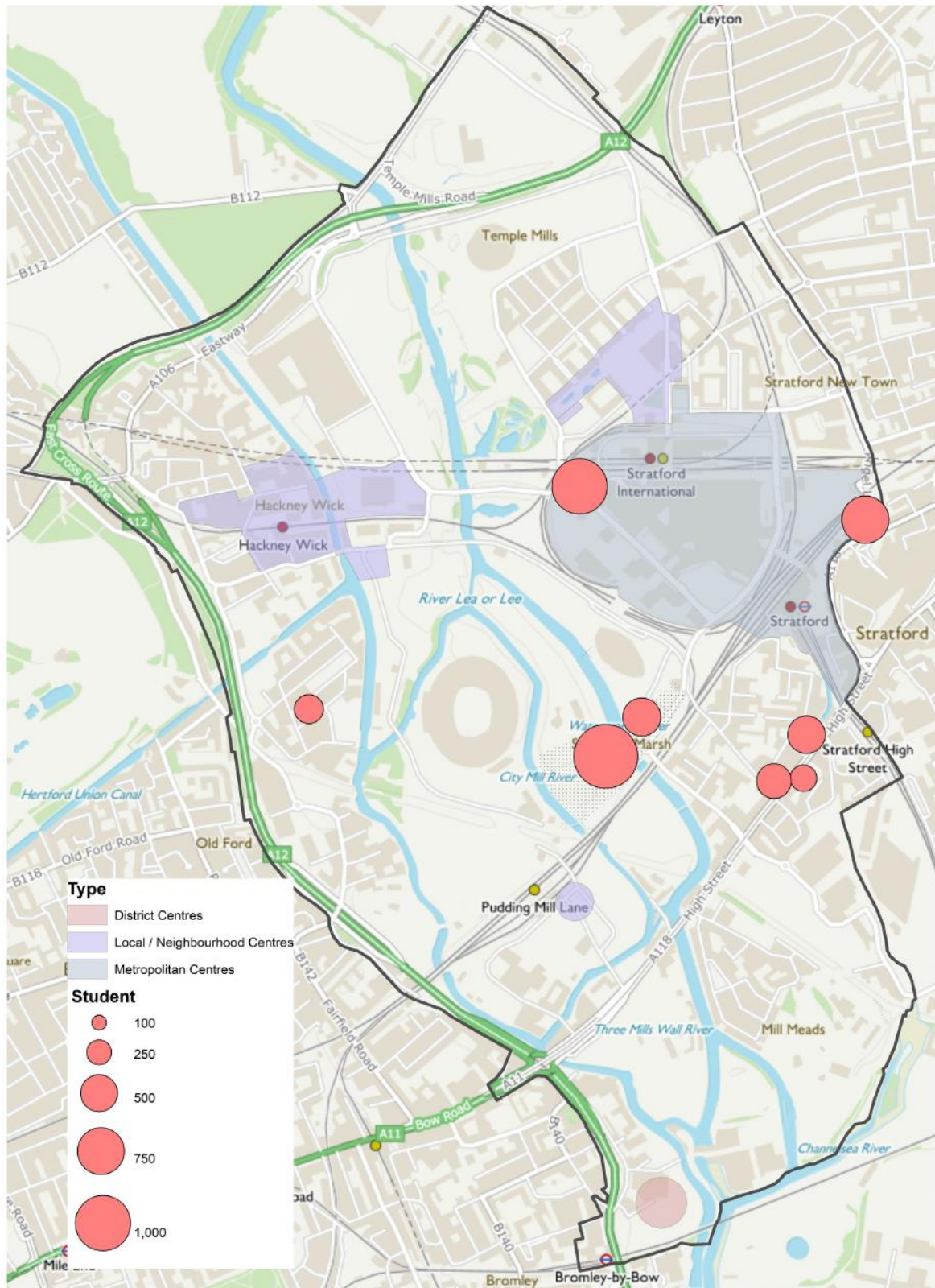
## Appendix 1 – LLDC AMR PBSA Schemes Table

Table 25: Purpose Built Student Accommodations schedule of bedrooms completed and permitted					
Scheme	Reference	Status	Number Completed	Pipeline	Location
Unite Group Student Accommodation	12/00221/FUM	Completed	759	0	Sub Area 3/Stratford
Unite Plot S25	11/90618/ FUMODA, 12/00224/FUL	Completed	1001	0	Sub Area 3/Stratford
UCL East	17/00235/OUT	Granted/ approx. 500 bed-spaces under construction	0	1800	Sub Area 3/Stratford
Alumno, 206-214 High Street	13/00404/FUM	Completed	445	0	Sub Area 3/Stratford
Poland House	Ref: 98/1268 and 12/00203/106; 20/00310/FUL	Granted	0	282 (net 182)	Sub Area 3/Stratford
Duncan House	17/00629/NMA, 19/00113/NMA 15/00598/FUL	Completed	511	0	Sub Area 3/Stratford
Future Generation,	19/00185/FUL	Under Construction	0	330	Sub Area 1/Hackney Wick and Fish Island



## Appendix 2 – LLDC AMR PBSA Schemes Map

Figure 6: Geographical distribution of existing and planned student accommodation schemes (March 2021)





# Appendix 2 – Convergence Statement

---

# 1 Introduction

---

- 1.1 This Statement of Convergence has been prepared by Quod for on behalf of Stratford Village Property Holdings 1 Limited (“SVPH1”) and Stratford Village Property Holdings 2 Limited (“SVPH2”) (the “Applicant”), in support of its planning application to the London Legacy Development Corporation (LLDC) for purpose-built student accommodation (PBSA) on development Plot N16 at East Village (“the Site”).
- 1.2 The Site is located within Zone 3 of the wider Stratford City development and part of East Village (comprising land in Zones 3-5).
- 1.3 Permission is sought for 504 student bedrooms in part 18-storey and part 10-storey building, with internal and external student amenity space, 332m<sup>2</sup> floorspace commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking, and other associated works.
- 1.4 The application seeks permission for the following development (the “Proposed Development”):  
  
*“Full planning permission for the construction of a part 10-storey, part 18-storey building providing purpose-built student accommodation (Sui Generis), with commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking and other associated works”.*
- 1.5 This statement outlines how the Proposed Development will support a closing of the deprivation gap between the Olympic host boroughs and the rest of London.
- 1.6 The focus will be on regeneration and economic impacts, the benefits of housing and growing the community, supporting healthy lifestyles and integration with the surrounding area.
- 1.7 The sections of this Statement are structured as follows:
  - **Section 2** – Outlines the principle of convergence;
  - **Section 3** – Provides a description of the Proposed Development
  - **Section 4** - Summary assessment of contribution to convergence; and
  - **Section 5** – Summary and Conclusions.

## 2 The Principle of Convergence

---

### The Olympic Legacy

- 2.1 Legacy was a core principle of London’s successful bid to host the 2012 Olympic and Paralympic Games. From an early stage it was recognised that the Games would act as a catalyst and driver in the economic and social regeneration and environmental remediation of one of London’s most deprived areas. Before the Games, the area had suffered from decades of underinvestment and was dominated by low-grade industrial uses and vacant or derelict sites. The condition of the area was often seen as a barrier to the eastward expansion of central London. (*Olympic Legacy SPG 2012 page 5 paragraph 4, page 11 paragraph 2*).
- 2.2 The area’s regeneration provides an opportunity for higher density, mixed-use development, integrating the Lower Valley with the rest of London delivering much needed jobs, homes, and public realm enhancement and associated infrastructure. The public sector bodies delivering the Games recognised that the Olympics provided a unique driver to realise these objectives and to create a new area of the city as a legacy to the 2012 Games. A critical element of the legacy is to ensure neighbourhoods and communities currently at the fringe of the Olympic and Stratford City Park are fully integrated with the proposals and benefit from the legacy of the Games. (*Olympic Legacy SPG 2012, page 7 paragraph 2*).
- 2.3 The first legacy planning permission for the Olympic site was granted in 2004 alongside a Games planning consent and a non-Games legacy consent. The 2012 Games were subsequently awarded to London by the IOC in 2005 and in 2007 the Olympic and Paralympic planning applications secured the permissions necessary to deliver the infrastructure and facilities required to host the Games, as well as the works required to transform these facilities into their legacy uses.
- 2.4 More recently several strategic studies have been undertaken setting out a vision for the Olympic Legacy. This includes the following documents:
- Olympic Legacy SPG (GLA, 2012) (replacing the GLA’s Lower Lea Valley Opportunity Area Planning Framework 2007 where the areas overlap (including this Site));
  - The Strategic Regeneration Framework (Host Boroughs, 2009);
  - Convergence Strategy and Action Plan 2015-2018 (GLA and the Host Boroughs, 2015) (updating and replacing the Convergence Framework and Action Plan 2011-2015);
  - London Plan – Spatial Development Strategy for Greater London (March 2021) (“London Plan”);
  - The Core Strategies of the host boroughs including that of the London Borough of Newham (the Newham Local Plan 2018); and
  - London Legacy Development Corporation Local Plan 2020 – 2036 (July 2020) (“Local Plan”).

## Convergence

- 2.5 The Olympic Park Regeneration Steering Group (OPRSG) formed by the GLA, host boroughs and central government agreed in 2009 to adopt the principle of ‘convergence’ as the overall long-term aim for the Olympic Boroughs.
- 2.6 The Olympic Legacy SPG (OLSPG) highlights the need for regeneration to achieve convergence with the rest of the capital. This includes (inter alia) providing homes for all, enhancing health and wellbeing, reducing worklessness and improving education, skills, and employment opportunities. A core development principle of the OLSPG requires that planning applications within the Legacy area include a document outlining how a Development would contribute to the overall objective for regeneration.
- 2.7 The promotion of convergence is also a priority theme throughout the Local Plan. This is highlighted in the Legacy Corporation’s purpose when considering the communities across the LLDC – to increase the prosperity of east London through growth in business and quality jobs; establish and maintain locally distinctive neighbourhoods which meet housing needs; and create a high-quality built environment.

## Convergence Strategy and Action Plan

- 2.8 To achieve and meet the ambition the Host Boroughs and GLA agreed and adopted the Strategic Regeneration Framework (2009) (SRF). This framework identifies seven key outcomes to achieve to meet convergence objectives and accompanying targets to meet by 2015. Convergence objectives included:
- creating a coherent and high-quality city within a world city region;
  - improving educational attainment, skills and raising aspirations;
  - reducing worklessness, benefit dependency and child poverty;
  - homes for all;
  - enhancing health and wellbeing;
  - reducing serious crime rates and anti-social behaviour; and
  - maximising the sports legacy and increasing participation.
- 2.9 The Convergence Framework and Action Plan 2011-2015 streamlined SRF around three themes, which this statement is based on:
- Theme 1: Creating wealth and reducing poverty.
  - Theme 2: Supporting healthier lifestyles.
  - Theme 3: Developing successful neighbourhoods.
- 2.10 Following the conclusion of the Action Plan period, the Host Boroughs reviewed progress against original targets and refined the objectives in an updated document - the Convergence Strategy and Action Plan 2015-2018.



2.11 The objectives of the Convergence Strategy and Action Plan 2015-2018 both focus on economic growth reflecting areas where further work and investment is required to meet targets. Objectives have been narrowed to two areas:

- Theme 1: Employment and Skills – increased employment and wage levels and higher levels of skills and qualifications; and,
- Theme 2: Transport – improved infrastructure to unlock jobs growth.

2.12 Therefore, both themes are focused on the local economy. Investment in skills and education will improve employment opportunities for local residents while investment in transport infrastructure will unlock new development sites which could support jobs growth.

2.13 This Convergence Statement provides a summary assessment of how the Development will help support and realise the themes of convergence as outlined in the two Convergence Strategy and Action Plans.

## 3 Proposed Development

---

3.1 The description of development for the outline planning application is as follows:

*“Full planning permission for the construction of a part 10-storey, part 18-storey building providing purpose-built student accommodation (Sui Generis), with commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking and other associated works”.*

3.2 Permission is sought for 504 student bedrooms in part 18-storey and part 10-storey building, with internal and external student amenity space, 332m<sup>2</sup> floorspace commercial, business and service floorspace (Use Class E) at ground floor, and landscaping, parking, and other associated works.

3.3 A detailed landscape scheme is provided as part of the proposals providing a public square of approximately 1,513m<sup>2</sup> with gardens and seating.

3.4 The Proposed Development will provide the following key economic and regenerative benefits:

- Sustainable growth of East Village contributing to wider economic and regeneration objectives of the LLDC development area;
- Delivery of 504 PBSA bedrooms, helping release conventional housing current occupied by students in East Village to the local community and helping meet the London wide student need;
- 1,513m<sup>2</sup> of high quality public realm - improving connectivity through the Site and helping to create an attractive new place;
- The Proposed Development is proposed as part of a masterplan approach and will help facilitate substantial enhancements to the existing public realm in Victory Park and the Belvedere adjacent to the Site; and
- 332m<sup>2</sup> GEA of Class E floorspace on the ground floor, which will provide further jobs in the Metropolitan Centre.

3.5 A more detailed description of the Development is provided in the submitted Design and Access Statement.

3.6 Accordingly, the Proposed Development is considered to make a significant positive contribution towards the convergence of the Olympic Boroughs. Each of the Convergence Themes are dealt with in turn below, followed by the impact that the Development would have on these outcomes.

## 4 Contribution to Convergence

---

### Introduction

- 4.1 This section provides an assessment of how the Proposed Development will support and promote the aims of the Convergence Action Plans. This is based on the parameters and Proposed Development set out in supporting planning application documents.
- 4.2 The themes of both the Convergence Framework and Action Plan 2011-2015 and the Convergence Strategy and Action Plan 2015-2018 are reviewed below. Given the duplication of objectives across the two documents, the theme of 'Employment and Skills' has been assessed alongside 'creating wealth and reducing poverty'.

### Transport

- 4.3 One of the two main themes presented in the updated Convergence Strategy and Action Plan 2015-2018 is development unlocked by transport improvements. This theme builds on the new approach to transport investment and moves the focus away from time-saving benefits to unlocking development potential around key transport hubs. The updated Strategy also considers that improved connectivity and accessibility from new and enhanced transport links is fundamental to form sustainable places to live and work, allowing changes of use and supporting more development enabling housing and jobs growth.
- 4.4 The Site is highly accessible with the highest PTAL rating (6b) due to its position within East Village Local Centre and adjacent to the Stratford Metropolitan Centre, which contains two rail stations, Stratford and Stratford International, which provide links to nearby stations as well as regional, national and international destinations.
- 4.5 The Site is located within Zone 3 of the Stratford City Outline Planning Permission (SC OPP) (ref:10/90641/EXTODA) and within East Village (comprising land in Zones 3-5). The SC OPP established the residential-led principles for East Village, with complementary retail uses on the ground floors. This Plot, and Plot N18/N19 are the two remaining plots to be developed, with a concurrent reserved matters application (RMA) for 848 residential units alongside this planning application for Plot N16. Both plots benefit from RMAs approved in 2014 for residential development.
- 4.6 However, as a part of the wider masterplan strategy the remaining residential floorspace will now be proposed only in Plot N18/N19, with new PBSA development proposed under this detailing planning application for Plot N16.
- 4.7 The Proposed Development will provide student accommodation for 504 students and further jobs in the ground floor Class E floorspace.
- 4.8 Therefore, the proposals will intensify the development in a sustainable brownfield location within the Local Centre and adjacent to the Metropolitan Centre delivering student housing near to new campuses for the University of the Arts London (UAL) and University College London (UCL). Providing purpose built student facilities will help release conventional housing

in East Village and the wider area to the local community that is currently occupied by students and will support the key theme of convergence.

## Employment and Skills / Creating wealth and reducing poverty

4.9 East London's Boroughs have some of the highest levels of deprivation with over 30% of children living with families receiving key benefits. The poverty in the London Borough's of Newham, Tower Hamlets, Hackney and Waltham Forest ("the Growth Boroughs") is juxtaposed by the wealth drawn in by the Canary Wharf complex and the upcoming developments in East London including Stratford City, Wood Wharf, Royal Docks, iCity and Greenwich Peninsula which presents opportunities for East Londoners in terms of jobs and training to find a route out of poverty<sup>1</sup>.

4.10 The aim of this theme is to increase employment levels and reduce child poverty across the Growth Boroughs. The focus of partnership working between 2011 and 2015 is:

- To maximise the Olympic Employment Legacy;
- To ensure that the work programme is effectively delivered and supports convergence;
- To develop partnership architecture with employers and training providers to support the achievement of Convergence outcomes; and
- To increase the levels of relevance of qualifications of Host Borough residents.

4.11 The OLSPG states that economic challenge for the area is "realising the [area's] potential to create places where people want to invest and work; and to nurture and support businesses that offer high quality employment and training" (p.5 paragraph 2). The OLSPG sets the target of creating a high-quality city area, improving skills and school attainment and reducing worklessness.

4.12 The updated Convergence Strategy and Action Plan 2015-2018 highlights the slow progress on indicators relating to employment and skills. While growth in job opportunities is forecast to grow there is a challenge to equip residents with the skills needed to fill these roles. Responding to this challenge the Action Plan focuses on improving skills outcomes among five employment sectors - health and social care, creative and digital industries, construction and facilities management, retail and hospitality, and finance and business services.

4.13 To ensure effective action the Action Plan also identifies five cross cutting themes:

- Partnership leverage
- Inspiring young people
- In work progression
- Collaborative employment support
- Supporting business and entrepreneurship

---

<sup>1</sup> London's Growth Boroughs Website.: <http://www.growthboroughs.com/convergence>

- 4.14 The Proposed Development will create a high-quality development which is attractive and well designed, helping to fulfil the vision for the regeneration area and enhance a key route along Celebration Avenue in East Village.
- 4.15 The Development would create construction employment, with opportunities for local training and apprenticeship schemes helping to address skills shortages within the sector. The overall construction cost and build period have been used to estimate the construction employment benefits associated with new housing and flexible use floorspace. Based on the guidance from the Homes and Community Agency (HCA) the proposals will create 370 full time equivalent (FTE) jobs in construction at its peak.
- 4.16 There will also be between 10-15 jobs created in relation to the operation of the PBSA and with the ground floor Class E floorspace, which across the Proposed Development would accommodate 30 to 40 FTE gross jobs overall.
- 4.17 The Development will provide accommodation for 504 students contributing to local and strategic student need. The proposed PBSA is intended to help provide purpose-built facilities for students who are already in the area and to address expected increases when UAL and UCL open and help release existing conventional housing in East Village to local residents. As a result, the new and existing residents in the local area supporting local amenities and businesses through household spending.

## Supporting Healthier Lifestyles

- 4.18 This theme aims to address the health inequalities experienced in the Growth Boroughs thereby helping to tackle the major causes of premature deaths. The four boroughs are home to some of the best and worst of the health services and health outcomes in London. Evidence collected by the Growth Boroughs show that underlying causes include low incomes, low skills, and physical inactivity<sup>2</sup>. This theme is therefore intertwined with employment and skills.
- 4.19 This theme targets actions to address health inequalities and the major cause of premature deaths. The focus of this theme under the Action Plan between 2011 and 2015 is:
- To give the children of the Growth Boroughs the best start in life.
  - To reduce the number of people dying prematurely from preventable causes.
  - To reduce the number of people whose health affects their ability to secure or maintain work.
  - To increase physical activity and social capital through changes in the built environment
  - To increase sport and physical activity participation especially in sports benefiting from a facility legacy from the 2012 Games.
  - To use Olympic and Paralympic momentum to motivate and raise expectations.

---

<sup>2</sup> London's Growth Boroughs Website. 'Supporting healthier lifestyles'. [online] Date Accessed: 25 June 2019. Available at: <http://www.growthboroughs.com/lifestyles>

- 4.20 The OLSPG aims to enhance the health and wellbeing of the borough's residents, increasing life expectancy, reducing chronic health conditions, and increasing the uptake of physical exercise.
- 4.21 The Proposed Development includes a student's gym and internal and external amenity spaces for students where they can exercise. In addition, outside the Site high quality public open space is proposed, which will include public furniture and amenities along the key route across the Site to the public realm in Victory Park and QEOP beyond.
- 4.22 Furthermore, the Site is located in close proximity to the Queen Elizabeth Olympic Park (QEOP), which provides a range of opportunities for outdoor amenity and exercise and includes world class sporting facilities, such as the former Olympic aquatic centre and velodrome. All of which, provide local opportunities for staff and visitors to increase their physical activity and enhance their health.
- 4.23 With the Site located within the Metropolitan Centre, a highly accessible location, car parking is limited to accessible users only, with secure cycle parking to be provided for staff to encourage more sustainable and healthier modes of travel. Further cycle parking for visitors will be provided in the public realm and complement the existing visitor cycle parking facilities provided in IQL South.
- 4.24 The Proposed Development will also increase access to employment, making it easier to pursue a healthy lifestyle, which cumulatively will help tackle poverty locally and improve the well-being of the local community.
- 4.25 The conventional homes released by students and local employment opportunities created will enhance the opportunities of the residents to access work locally. Tackling poverty and increasing employability is one of the most important determinants of good health.
- 4.26 The Proposed Development will also improve links between new and existing communities contributing to social cohesion, which in turn helps support good health.
- 4.27 The proposals adopt the Principles of Secure by Design, helping to create safe environments, to minimise crime and antisocial behaviour and to reduce fear of crime and contributing to enhanced health outcomes.
- 4.28 The Proposed Development would also reduce CO2 emissions in line with GLA guidance, contributing to wider health objectives by reducing harmful impacts on air quality, through following the principles of the energy hierarchy, fabric efficiency measures and renewable technologies.



## Developing Successful Neighbourhoods

- 4.29 Crime, overcrowding and poor public realm obstruct new investment in the Growth Boroughs. Addressing these issues in parallel with employment and health will help to unlock the potential of the area<sup>3</sup>.
- 4.30 The aim of this theme is to increase investment and address environmental inequality and the high crime rates that can impact communities and lives. The focus of this theme under the Action Plan between 2011 and 2015 is:
- To reduce levels of violent crime and gang activity
  - To complete the Olympic public realm improvements programme and secure the legislative changes necessary for more effective environmental enforcement.
  - To increase the number of affordable homes and reduce overcrowding.
  - To deliver new city districts with a range of accessible and high-quality facilities
  - To maximise the inward investment legacy
  - To ensure the cultural activity builds stronger communities and supports economic growth.
  - To develop partnership arrangements for the development of successful neighbourhoods theme.
- 4.31 The OLSPG sets out its vision for successful neighbourhoods including reducing crime and antisocial behaviour, providing affordable homes and providing high quality public realm.
- 4.32 The LLDC aims to create successful neighbourhoods in the Queen Elizabeth Olympic Park, with up to 8,000 new homes. It is also securing tenants and operators for legacy venues and planning programmes of events and activities to make the Park an amenity for local people, a magnet for visitors, and a driver for economic development. The success of the new city district being built in and around the Park is crucial to demonstrate success and potential in the Growth Boroughs.
- 4.33 The Proposed Development will provide 504 PBSA bedrooms that count towards housing delivery and a mixed and balanced community. An exhibition space and public lobby is proposed on the round floor and will enhance cultural activity in the area.
- 4.34 The PBSA proposals include several types of amenity space for students with generous proportions to ensure a high level of amenity.
- 4.35 The building is designed to comply with Secured by Design principles, with the Site forming part of the wider East Village area that is managed by an Estate Management company ensuring the quality and safety of the public realm. Allied to this, the proposals include active frontages onto all vehicular and pedestrian routes on ground and lower ground floor level. Landscaping proposals seek to green the majority of the public realm where possible with trees

---

<sup>3</sup> London's Growth Boroughs Website. 'Developing successful neighbourhoods'. [online] Date Accessed: 25 June 2019. Available at: <http://www.growthboroughs.com/neighbourhoods>

and low-level planting, overall enhancing the quality of public realm and improving pedestrian links to the QEOP.

- 4.36 East Village, within which the Site is located, is a new residential district created since 2012 and is the residential focus of Stratford City creating a new neighbourhood in a highly accessible area adjacent to the jobs, shops and amenities in Stratford Metropolitan Centre.
- 4.37 Overall, the Proposed Development will provide for the demand for student accommodation in the area and help release conventional housing in East Village, as well as providing on site public amenities and exhibition space to the benefit of the local community.

## 5 Summary and Conclusions

---

- 5.1 This statement provides an assessment of the Proposed Development of Plot N16 in East Village, against the objectives for convergence sought as a legacy of the 2012 Olympic and Paralympic Games.
- 5.2 The OLSPG has prioritised the social and economic convergence of the Olympic Host Boroughs with their London neighbours as the desired outcome of the Olympic Games and their legacy.
- 5.3 The Proposed Development will provide additional student accommodation to meet the growing demand in the area related to the future opening of UAL and UCL campuses in Stratford. This helps allow students to move from conventional housing in East Village and release housing for the local community. The proposals also include a publicly accessible lobby and exhibition space and new enhanced area of public realm.
- 5.4 The Proposed Development will secure investment in Stratford and be occupied by around 504 students, which cumulatively will contribute to job creation and local economic growth. This will support reducing local poverty, increasing opportunities for employment and help grow the local economy.
- 5.5 Physically, the Proposed Development will provide an increase in public open space and well-designed, safe and attractive landscaped public realm. This enhances links through to the QEOP, where there are opportunities for employees and visitors for outdoor activity and exercise, contributing to the health and wellbeing of employees and visitors. The proposals also form part of a wider masterplan strategy and help facilitate substantial enhancements to the main public realm areas in East Village in Victory Park and the Belvedere. As such, the Proposed Development will help contribute towards developing successful neighbourhoods.
- 5.6 The Site is also located in a highly accessible location, allowing for the Proposed Development to be car-free, except for an accessible bays and will provide cycle parking at London Plan (2021) standards to increase opportunities for active transport modes to the Site. Consequently, the Proposed Development will support healthier lifestyles.
- 5.7 Accordingly, the Proposed Development is consistent with the long-term objectives for convergence outlined in the GLA's OLSPG and the two Convergence Action Plans, making a significant and positive contribution to convergence.