

14 September 2023  
L230914 SAV Covering Letter



Development Control  
London Borough of Newham  
1<sup>st</sup> Floor, West Wing  
Newham Dockside  
1000 Dockside Road  
London  
E16 2QU

Savills (UK) Limited  
DL: +44 (0) 207 409 5919

33 Margaret Street  
London W1G 0JD  
T: +44 (0) 20 7499 8644  
savills.com

Dear Sir or Madam

**SECTION 62 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
APPLICATION FOR USE OF FIRST AND SECOND FLOORS AS 'BUSINESS SCHOOL' (CLASS F1(a))  
10 GROVE CRESCENT ROAD, STRATFORD, LONDON, E15 1BJ  
LONDON SCHOOL OF SCIENCE & TECHNOLOGY LIMITED**

**Introduction**

We write on behalf of London School of Science & Technology Limited ('**LSST**') ('**the Applicant**'), to apply for planning permission for use of the first and second floors at 10 Grove Crescent Road as a 'Business School' (Class F1(a)).

The proposed development will facilitate the occupation of the floorspace by LSST.

In accordance with the Town and Country Planning (Development Management Procedure) Order 2015, the documents which comprise the application include the following:

- This covering letter;
- The completed application form and certificates;
- The completed CIL form;
- Site Location Plan;
- Drawing Ref: 023/PR/201 Rev B – Proposed First Floor; and
- Drawing Ref: 023/PR/202 Rev B – Proposed Second Floor

The planning application has been submitted and the requisite planning application fee (£462) paid, electronically via the Planning Portal (Ref: PP-12311885).

**The Application Site**

The application site comprises floorspace within an existing commercial building located at 10 Grove Crescent Road in the London Borough of Newham (the '**Site**').

It specifically relates to the first and second floors of an existing 6 storey office block located on the northern side of Grove Crescent Road. The floorspace is currently vacant.

The full extent of the Site is identified by the red line on the Site Location Plan. Note again that the application site only relates to floorspace at the first and second floors of the building; none of the other floors are included within the Site.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.  
Registered office: 20 Grosvenor Hill, London W1K 3HQ

\\pdrvms09.fpd.savills.co.uk\ManchesterData\Planning\Planning (Archive 1)\LSST\Stratford\CoU Application\L230914 SAV Covering Letter.docx

There is a total of 48 car parking spaces and 149 cycle spaces provided at basement level beneath the office block and part of the linear residential block.

The surrounding area is a mix of both commercial and residential uses; reflecting its location at the edge of Stratford Metropolitan Centre.

Directly adjoining the office block to the west is a 6 storey residential block, 1 to 24 Darnay Apartments. To the east is a rear yard area which serves a commercial warehouse, Priority Plumbers (2 Grove Crescent Road).

To the north of the site is the railway line serving TfL rail and to the south are a row of terraced dwellings of Grove Crescent. To the south east of the site is the locally listed St Francis Roman Catholic Church and to the south west is the locally listed Tom Allen Centre.

The host property is not listed and is not located within a conservation area. The boundary of the St John's Conservation Area is located to the south of the Site on the opposite side of Grove Crescent Road.

### **Relevant Planning History**

The floorspace at the Site was constructed pursuant to planning permission granted on 20 June 2006 for the *"demolition of existing buildings and construction of new buildings including 19 storey tower providing 160 flats, approximately 3,716 sq. m of office space, separate commercial unit of approximately 119 sq. m and 48 car parking spaces"* (Ref: 04/1164).

This permission allowed for the construction of a 6 storey office building on the northern side of Grove Crescent Road which has the given address of 10 Grove Crescent Road. The wider check

On 20 June 2019, planning permission was granted for *"change of use of the ground and first floor of 10 Grove Crescent Road from B1 (office) to flexible use class B1/D1 to provide educational facilities for a Recovery College focusing on combating homelessness. Amendments to basement layout including replacement of existing car parking space for ancillary storage"* (Ref: 19/00748/COU).

Condition 6 of this permission stipulated that the proposed Recovery Centre was only permitted to operate between the following hours in order to minimise noise and disturbance:

Mondays to Fridays: 09:00-21:00  
Saturdays: 09:00-18:00  
Sundays: 10:00-16:00

Condition 9 of this permission stated that *"the premises shall be used as a recovery centre to provide education services for the homeless community and for no other purpose, including any other purpose in Class D1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification"*.

### **The Proposed Development**

The application seeks planning permission for the change of use of the floorspace at the Site from 'Office' (Class E) to 'Business School' (Class F1(a)).

The floorspace will be occupied for the provision of education services by the LSST who provide business degree and professional level programs for adults.

The other floors within the host building would remain in office use (Class E) such that this remains the principal function at the wider site.

LSST is a community-based learning provider requiring additional space within the town centre to provide further educational facilities for adults. The School provides 'hands on' training to local mature learners with the average age of students being 26.

The proposal seeks to bring vacant floorspace back into an active and economically positive use which will also contribute to expanding education and training facilities within the Borough. The proposed facility is anticipated to employ 15 staff and would cater for up to 70 students.

The School will typically operate classes between the following hours:

- 09:00 – 21:00 on Monday to Friday; and
- 09:00 – 18:00 on Saturdays.

There are no physical works proposed formally as part of this application. Any physical works that are required to facilitate the proposal will be internal or do not constitute 'development' as defined by Section 55 of the Act.

### **Assessment of Proposed Development**

The Development Plan for LB Newham comprises the London Plan 2021 (adopted March 2021) and Newham Local Plan 2018 (adopted December 2018).

The Council is in the process of undertaking a review of the adopted Local Plan with this intended to update the vision and strategy for Newham's growth up to 2038.

Consultation on a Regulation 18 version of the emerging Local Plan was undertaken between 9 January and 20 February 2023. It is anticipated that further consultation on a Regulation 19 version of the Local Plan will be undertaken in November 2023 prior to schedule submission to the Planning Inspectorate in Q1 2024.

Given that the emerging Local Plan is yet to be tested at Examination the weight which can be applied to its policies is limited.

Below we assess the proposed development against the relevant planning policies in the development plan and all other material considerations (including the National Planning Policy Framework) ('**NPPF**').

### ***Principle of Development***

The National Planning Policy Framework (2021) states that planning decisions should help to create the conditions in which business can invest, expand and adapt.

Paragraph 96 specifically encourages local planning authorities to work proactively and positively with promoters, delivery partners and statutory bodies in order to ensure faster delivery of public infrastructure such as further education colleges.

The London Plan 2021 also seeks to ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice (Policy S3).

At the local level Newham Local Plan Policy INF8 sets out criteria for community facilities (such as tuition centres), giving requirements that need to be met in order for the use to be considered acceptable.

This states that community facilities' development and growth will be coordinated to ensure that the delivery and retention of such facilities is carefully managed in order to align provision with need.

Whilst Policy INF8 seeks to direct such facilities towards town or local centres exceptions to this are permitted subject to the satisfaction of other criteria. In this case, the Site is located on the edge of Stratford Town Centre and forms part of an established employment which promotes education.

Given the existing cluster of educational uses in the surrounding area the principle of the proposed use is considered to be acceptable. This position was established as part of the determination of Application Ref: 19/00748/COU for the change of use of floorspace to a recovery college within Class D1.

The proposed change of use would not result in the loss of any residential floorspace given the existing lawful use of the Site. As set out above, LSST is a community-based learning provider who is looking to locate in Stratford to provide further educational facilities for adults within Newham. The Site is located within a highly accessible area of Stratford with excellent public transport, walking and cycling links. It provides suitable floorspace which can accommodate the requirements of the School and its students in terms of delivering a modern and comfortable learning environment.

The proposed development will have a series of positive socio-economic effects which are important material considerations. The School can help to 'up-skill' local people which in turn can reduce level of unemployment and increase average wage potential.

The proposed use of the premises will facilitate private sector investment into the premises and wider Site. Reactivating the floorspace will trigger physical and economic regeneration at the Site and increase the prospect of the re-occupation of the premises.

Overall, given the above the principle of the change of use is considered to accord with the aims of the NPPF, the London Plan and the Newham Local Plan and would help to facilitate the further expansion of education facilities in this area of Stratford.

### ***Highways and Transportation***

The Site is located in a highly accessible location. It has the highest achievable PTAL Rating of 6b which reflects its location adjacent to Maryland Rail Station and in close proximity to a series of bus stops.

Policy SP8 requires that the pattern of urban growth and the use of land is managed to make the fullest use of public transport. Sustainable travel choices will be provided to reduce the need for travel by private modes. Policies T5 and T6 of the London Plan and Policy INF2 of the Newham Local plan outline the requirements for car and cycle parking associated with the provision of new educational uses:

Cycle parking standards:

- Long stay: 1 space per 4FTE staff + 1 space per 20 FTE students
- Short stay visitor: 1 space per 7 FTE students

Car parking standards:

- In Outer London Opportunity Areas maximum parking on-site provision for parking in university / college use should be limited operational needs; and
- 5% of existing parking facilities should be designated disabled bays, for educational uses.

Given the excellent public transport connections it is expected that the vast majority of students and employees will use sustainable modes of transport. Notwithstanding this, eight of the existing car parking spaces (including mobility impaired spaces) will be demised for use by the Business School.

Based on the proposed maximum occupancy of students and employees the proposed operation would generate a requirement for: 8no long stay spaces and 10no short stay visitor spaces.

The existing cycle parking provision for the wider building is considered sufficient to meet the demand generated by the existing and proposed land uses at the Business school and retained office floorspace. The existing cycle parking at the site is also covered and secure to meet the requirements of the standards.

In terms of standard trip generation in 'peak hours', an educational use of the type proposed (Class F1(a)) is lower than the established 'office' use. Lower overall trip generation is supported by lower parking density requirements for educational facilities. It follows there should be fewer overall vehicular movements to and from the Site as a result of the change of use and as the Business School is not anticipated to generate any unacceptable impacts on the safe or convenient use of the local highway network.

The Site is highly accessible by public and sustainable modes and as such is a preferred location for the proposed use (providing a genuine opportunity for students and staff to use non-private modes). Accordingly the proposed development will not result in a 'severe' impact on the local highway network and as such accords with Paragraph 111 of the NPPF.

### ***Impacts on Amenity***

The proposed change of use to from 'office' to an 'educational facility' will not give rise to any detrimental noise or disturbance issues. There is no material difference in operation or function between the two land uses.

Given the central location of the Site; the proposed operation is considered to be entirely appropriate and consistent with the established function of the building and the wider locality.

### **Summary and Conclusion**

The application seeks planning permission for the Use of the first and second floors at the Site as a 'Business School' (Class F1(a)).

The proposed development will facilitate the re-occupation of vacant floorspace by LSST. The School specialises in providing 'hands on' training for mature students and would directly accord with the objectives of both the Local Plan and London Plan.

Whilst there will be a loss of office floorspace the small scale nature of the proposal means it will not have any material impact on employment land supply within Newham. The Council has also previously accepted this loss in respect of the approval of Application Ref: 19/00748/COU in June 2019.

The proposed use will not generate any other unacceptable impacts that would conflict with relevant policies within the development plan. The use is entirely appropriate for the Site having regards to its established function and location and is consistent with what has previously been accepted at the Site.

Critically, the proposed development accords with the overarching objective of the NPPF to deliver sustainable economic development. It will facilitate private sector investment, economic growth and job and wage creation in the Borough.

We trust that the details included within this submission provide you with sufficient information to register and consider this application.

In the meantime, should you require any clarification or additional information, please do not hesitate to contact Chris Moore or Tim Price at these offices.

Yours faithfully,

A handwritten signature in cursive script, appearing to read "Savills", written in black ink.

**Savills (UK) Ltd**