

## LD11d

### Legacy Corporation Draft Revised Local Plan: Summary of Main Issues resulting from Regulation 19 Consultation of November-December 2018)

The following sets out the what the Legacy Corporation considers to be the main issues that have been raised through the responses received to the Regulation 19 stage consultation on its draft Revised Local Plan. A full summary of all responses received along with a response have been set out in Documents [LD11B](#) and [LD11C](#). These and all other documents relating to the Examination of the draft Revised Legacy Corporation Local Plan can be found on the Legacy Corporation website at: <https://www.queenelizabetholympicpark.co.uk/planning-authority/planning-policy/examination-of-revised-local-plan-and-cil> .

#### General issues:

**Legacy Corporation Planning Powers:** the future lifespan of the Legacy Corporation and its planning power, including how this may impact on the need to revise the Local Plan and any revisions that are proposed to it. London Borough of Tower Hamlets considers that the policies in the Local Plan, particularly for housing, should be more aligned with those of the four boroughs.

#### Sections 1-3 (Introduction, Our Area, Our Vision):

no main issues

#### Section 4 – Developing business growth, jobs, higher education and training

**Policy B.1 Location and maintenance of employment uses:** divergent views about the legitimacy and suitability of continued retention of industrial land and uses in employment clusters and across the area as a whole, including with reference to NPPF paragraph 120. Concern over the role of intensification and co-location and the impact of introduction of new non-residential uses on the viability and function of existing industrial uses, including the application of the agent of change principle. Concern over perceived prioritising of lighter/high tech/cultural/creative uses over valuable heavier space extensive industries and the impacts this may have within the wider London Borough of Newham. Need to recognise the role of logistics and distribution beyond job density. Concerns about specific employment clusters and the suitability of the range of industrial uses identified within Table 3.

**Policy B.2 Thriving town, neighbourhood and local centres:** welcomed policy for directing such office uses to Stratford but some questioning the applicability of the CAZ reserve and whether this relates to additional office accommodation than was previously envisioned.

**Policy B.3 Interim Uses:** support for policy approach but role of interim housing and need for protection of blue and green infrastructure identified.

**Policy B.4 Providing low-cost business space, affordable and managed workspace:** question about whether approach is effective without specific requirements or triggers and whether policy should recognise scheme viability.

## **Section 5 – Providing Housing and Neighbourhoods**

**Policies SP.2 Maximising housing and infrastructure provision within new neighbourhoods and Policy H.1 Providing for and diversifying the housing mix:** whether there is adequate information on housing land supply and delivery information with additional clarifications sought in relation to the statements about delivery within the plan phases and timescales. Effectiveness of small sites assumptions over the plan period and identification of small sites to meet specific NPPF requirements.

*LLDC note- The Housing Delivery Explanatory Note (2019) was produced to provide further detailed information on housing delivery rates over the plan period as requested above.*

**Policy H.1 Providing for and diversifying the housing mix:** level of prescription of dwelling size requirements and perceived lack of consideration of specific borough housing size requirements with pursuit of additional emphasis on 3-bedroom family accommodation.

**H.2 Delivering affordable housing:** utilisation of the Mayor of London’s viability approach and whether further investigation of the role of unit or habitable rooms should have taken place. Impacts on mixed and balanced communities with respect to the affordable housing requirement across LLDC sites.

**Policy H.1 Providing for and diversifying the housing mix and H.2 Delivering affordable housing:** level of policy prescription of the policy with respect to Build To Rent in general and consistency with the draft New London Plan with respect to the tenure split requirement of 60% equivalent to London Affordable Rents (LAR) rents, 30% London Living Rents (LLR) and 10% equivalent rates to other intermediate products. Evidence base concerns, including whether the viability testing recognises the distinct economics of the sector and whether the Housing Requirements Study should have considered demand for Build to Rent products in greater detail.

*LLDC note- The Housing Delivery Explanatory Note (2019) has provided some additional commentary and information from the consultants as to how the viability of Build-to-Rent accommodation was determined.*

## **Section 6 – Creating a High Quality Built and Natural Environment**

**Policy BN.3 Maximising biodiversity:** whether the policy should include a requirement that a Biodiversity Action Plan is assessed and verified by an independent professional ecologist.

**Policy BN.4 Designing Development:** whether it is appropriate for the policy to include reference to and require residential and mixed-use development to take account of the London legacy Development Corporation’s Design Quality Policy.

**Policy BN.5 Proposals for tall buildings (previously Policy BN.10 in the adopted Local Plan):**

whether it is appropriate for the revised policy to include a requirement for significant additional public benefit where tall buildings are proposed outside of the identified appropriate locations. Whether Part 5 of the policy addressing outline applications for tall buildings, is sufficiently detailed as to be clear about the requirements for design codes.

**Policy BN.11 Air Quality (previously Policy BN.11 Reducing noise and improving air quality):**

whether, considering issues of air quality in the LLDC area, Policy BN.11 should be further strengthened and incorporate the new air quality positive threshold as in the emerging London Plan.

**Policy BN.14 Improving the quality of land (previously BN.13)** Whether the policy should give more weight to the safeguarding of groundwater and a specific reference should be made to Source Protection Zones (SPZs) and measures outlined to protect these.

## **Section 7- Securing Transport Infrastructure to Support Growth**

**Transport Study:** Whether the transport evidence provides an appropriate level of evidence to support the Plan, particularly in relation to the potential for increased impact on the wider Strategic Road Network (SRN).

**Policy SP.4 Planning for and securing transport infrastructure to support growth and convergence:** should this policy and the Plan make reference to the potential for new stations to the north east of the Legacy Corporation area.

**Policy T.1 Strategic transport improvements:** whether the policy and the Plan appropriately addresses the issues and challenges of capacity at Stratford Regional Station in the light of the level of potential and planned development in the area.

## **Section 8 – Creating a Sustainable Place to Live and Work**

**Policy S.1 Health and wellbeing:** whether the supporting evidence for the Plan is sufficiently in respect to provision of sporting facilities and whether the policy should include direct reference to sporting facilities and whether it should include reference to the potential for the health benefits from active travel in relation to canals and waterways. Should the policy include a requirement for health impact assessments?

**Policy S.7 Planning for waste:** whether removal of text from the policy requiring reprovision of waste-sites within the borough within which they were originally located is justified or should be retained.

**Flood Risk evidence and Policy S.10 Flood risk and Policy S.11 Sustainable drainage measures and flood protections:** Whether Legacy Corporation Level 1 and Level 2 Strategic Flood Risk Assessment should have been undertaken as part of the relevant evidence relating to flood risk. Whether the policy should specifically prohibit undercroft flood storage and attenuation tanks as flood risk mitigation measures.

## **Section 10 (Sub Area 1) – Hackney Wick and Fish Island**

**Site Allocation SA1.3 (Hepscott Road):** Issue of whether the changes to the site allocation in relation to waste management and transfer of waste capacity have a potential detrimental impact on the London Borough of Tower Hamlets London Plan waste apportionment target.

**Site Allocation SA1.5 (East Wick and Sweetwater):** issue of whether it is appropriate to include wording in the site allocation to indicate potential acceptability of a tall building at Here East.

**Adopted Local Plan Policy 1.6 (Building to an appropriate height in Hackney Wick and Fish Island):** whether deletion of the policy and reliance on a revised main policy within the revised draft Plan is appropriate and the approach, which sets a policy application threshold of 20m above ground level, is flexible enough to achieve high quality mixed use developments within the sub area.

## **Section 11 (Sub Area 2) – North Stratford and Eton Manor**

**(New) Site Allocation 2.4 Chobham Farm North:** whether the boundary of the site allocation should be extended to include all of the strip of land that runs alongside the railway lines to its west. Whether the site allocation is clear enough about the types of non-residential uses that would be appropriate within the site allocation area.

## **Section 12 (Sub Area 3) – Central Stratford and Southern Queen Elizabeth Olympic Park**

**Policy 3.1 Stratford Metropolitan Centre and Site Allocation 3.1 Stratford Town Centre West:** need to reinforce the position of directing main town centre uses towards the whole of the Metropolitan Centre boundary including within the London Borough of Newham’s planning area, and the relationships and connectivity between. Recognising connectivity issues and constraints at and around Stratford Station. Opposition to the Madison Square Gardens (MSG) proposals for Chobham Farm South.

**Site Allocation 3.2 Stratford Waterfront North:** specific comments with concern about affordable housing levels from East Bank scheme and implications for other sites including in particular SA3.6 (Rick Roberts Way).

**Site Allocation 3.4 Greater Carpenter District:** objections to the suitability and methodology behind the 2,300 homes minimum target for Greater Carpenters site allocation (SA3.4) and whether this can be achieved considering the aspirations of the Greater Carpenters Neighbourhood Forum for maintaining the estate and affordable housing implications thereof.

**Site Allocation 3.6 Rick Roberts Way:** delivery of affordable housing, placemaking and overall viability of the development. Justification and feasibility of primary school requirement at Rick Roberts Way (SA3.6).

## **Section 13 (Sub Area 4) – Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads**

**Policy 4.2 Bringing forward new connections to serve new development:** does the policy require amendment to ensure that requirements are not overly onerous for new development?.

**Site Allocation SA4.1 (Bromley-by-Bow):** whether it is still appropriate that the site allocation identifies Bromley-by-Bow South as the location for a potential new District Centre and should it continue to require delivery of a primary school in this location as part of its comprehensive development?

**Site Allocation 4.3 (Pudding Mill):** whether the requirement for achieving 25% non-residential floorspace across the site allocation remain appropriate in the context of potential competing inputs and costs, does this adequately take viability into account?

**Site Allocation SA4.5 (Bow Goods Yards (Bow East and West):** whether the proposed new site allocation is appropriate as an approach to the future development of this area of Strategic Industrial Land and as a protected railhead. Whether the approach to intensification of industrial uses and the potential for allowing other non-industrial uses in the long-term, appropriate. Does it allow for potential conflicts between uses within and around the site to be mitigated.