

London Legacy Development Corporation – Local Plan Review Examination

LLDC response to Matters, Issues and Questions Discussion Note (ID/10) (7th August 2019)

Introduction

This document sets out the London Legacy Development Corporation's responses to the Inspectors Matters, Issues and Questions, published on 24th June 2019.

The following three additional documents are referred to within this response (the first two documents are annexed to this response and added to the examination library with reference numbers [LD33](#) and [LD34](#)) and the third document (due to its size) is added to the examination library only with reference number [[LEB8A](#)):

- Annex 1 - Housing Delivery Information by Financial year ([LD33](#))
 - Part A – Confirmatory evidence on housing delivery from key developers, including housing trajectory
 - Part B – Updated Table of Key Housing Locations
- Annex 2 - Public transport capacity note (July 2019) ([LD34](#))
- Flood Risk Review Report (updated, July 2019) ([LEB8A](#))

Matter 1 - Legal Requirements, Scope of the Plan & Duty to Co-operate

1.1 Legal Requirements: Does the London Legacy Development Corporation Local Plan Review (hereafter referred to as the Plan) meet all its legal requirements (e.g. in relation to the Local Development Scheme; Strategic Regeneration Framework 2009; Statement of Community Involvement; the London Plan and Local Development Regulations, 2012)?

LLDC response: the LLDC has included a [Legal Compliance Self-assessment \(LD18\)](#) with the submitted Draft Revised Local Plan outlining how the legal requirements have been met within the process of the review of the Plan. Appendix 1 of the Plan, paragraph A1.11 (page 217 in [LD4](#) and page 267 in [LD5](#)) outline the relationship between the Local Plan and the Strategic Regeneration Framework.

1.2 Scope of the Plan: Does the scope of the Plan accord with the strategy, objectives and policies of the London Plan? What account, if any, should the Plan give to the emerging Draft London Plan (DLP), especially in view

of the Mayor of London's comments that any policies that diverge from the Draft London Plan will become out-of-date as the DLP gains more weight as it moves towards publication, with adoption anticipated in the winter of 2019/2020?

LLDC response: the Plan has been reviewed and updated to ensure that it takes the Draft London Plan (DLP) into account and many of the Plan's policies closely relate to the policies within the DLP. The Mayor of London has confirmed within the [Statement of Conformity with the London Plan \(LD19\)](#) that he considers the Plan to be in General Conformity with the DLP.

1.3 Duty to Co-operate (DTC): Has the London Legacy Development Corporation (LLDC) fulfilled its duty under Section 33A of the Act, so as to maximise the effectiveness of the plan making process when planning for strategic matters that cross administrative boundaries. Within this context:

(i) Has the LLDC worked collaboratively with other authorities and organisations during plan preparation on strategic planning matters that cross administrative boundaries? [A critical factor is that the duty to co-operate (DTC) is incapable of modification at the Examination stage].

(ii) Has the LLDC worked or liaised with the relevant bodies set out in the national Planning Practice Guidance (PPG)? How has the Council also co-operated with the relevant Local Enterprise Partnerships (LEPs) and Local Nature Partnerships (LNPs)?

LLDC Response:

(i) The LLDC has fulfilled its duty under Section 33A of the Act. The [Duty to Cooperate Background Paper \(TBP9\)](#) sets out how the Duty to Cooperate has been met in undertaking the review of the Adopted Local Plan. This includes a general Memorandum of Understanding (MoU) with the four Boroughs and separate MoUs in relation to waste planning matters. Statements of Common Ground have been agreed with each of the Four Boroughs and are published as documents [TBP9](#), [TBP10](#), [TBP11](#) and [TBP12](#). Where this has been considered necessary, these include updates that have been agreed since the original signing dates, for example [TBP10](#), Statement of Common Ground with London Borough of Newham has been updated by appending [TBP10A](#) to the original document.

(ii) Engagement with the Local Enterprise Partnership and the Local Nature Partnership within the London context has been through the Greater London Authority (GLA) and is reflected in the wider engagement

and correspondence with the GLA. This is also outlined in the [Legal Compliance Checklist \(LD18\)](#).

Matter 2 - Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)

2.1 Spatial Strategy: Is the spatial strategy supported by the SA and the HRA?

LLDC response: The submitted [Integrated Impact Assessment \(IIA\) \(LD8\)](#) includes the HRA Appropriate Assessment Report at Appendix C. Document [LD9](#) supports this as a non-technical summary of the IIA. The sustainability strategy is contained within the overall integrated impact assessment and has been scoped and prepared from the outset of the review of the Local Plan which itself has taken into account the outcomes of the assessment process.

2.2 Reasonable alternatives: Have reasonable alternatives for the location and quantum of proposed development been considered in the SA? Is there a clear audit trail from the consideration of option to the preferred strategy in the Plan?

LLDC response: The [IIA \(LD8\)](#) sets out the options considered where changes to policies and site allocations have been proposed or where new policies and site allocations have been included. This provides a clear audit trail for those changes and additions. This is also the case with the HRA Appropriate Assessment.

2.3 Mitigation: Which adverse effects identified by the SA and HRA require significant mitigation, and how is the LLDC addressing these issues, for example in relation to the Epping Forest Special Area of Conservation (SAC)?

LLDC response: the only mitigation measures required to address adverse impacts are those identified within the HRA Appropriate Assessment report at Appendix C of the [IIA \(LD8\)](#), Section 6.3 Mitigation Measures. This relates to three identified European Sites outside of the LLDC boundary including the Epping Forest SAC and the recommended mitigation has been included within the [Schedule of Proposed Post-Publication Modifications \(2019\) \(LD20\)](#) to the Draft Revised Local Plan which inserts modifications **M7, M8, M9** and **M10** identifying the need, in particular circumstances, for planning applications to be accompanied by a Project Level Habitats Regulations Assessment.

Matter 3: Section 3 – Vision

3.1 Overall Vision: Are the overall strategic principles and vision-based spatial strategy of the Plan, and overall design criteria, as set out in the objectives, vision statement and **policy SD1** (sustainable development) and the supporting text, based on a sound assessment of Plan Area’s demographic and socio-economic needs, environmental characteristics, existing and proposed infrastructure and relationships with neighbouring areas, in accordance with national planning policy, including section 2 of *the Framework* and the London Plan?

LLDC response: The Plan is based on a sound assessment of the LLDC area's demographic and socio-economic needs, environmental characteristics, existing and proposed infrastructure and relationships with neighbouring areas. Section 2 of the Plan 'Our Area' provides a snapshot of the economic, social and environmental background to the LLDC area. Greater detail is provided in the [Spatial Portrait Background Paper \(TBP7\)](#). A population projections and residents survey report provides detailed analysis of the demographics and related matters for the area ([Population Projections Report LEB1](#)). This provides bespoke analysis and data for the LLDC area. A range of other studies have been prepared which have helped to evidence the approach to the review of the Local Plan, with key elements including:

- [Housing Requirements Study \(LEB2\)](#)
- [Economy Study \(LEB3\)](#)
- [Business Survey \(LEB4\)](#)
- [Creative and Cultural Opportunities Assessment \(LEB5\)](#)
- [Retail and Town Centre Needs Study \(LEB6\)](#)
- [Open Space and Playspace Study \(LEB7\)](#)
- [Flood Risk Review \(LEB8 and LEB8A\)](#)
- [Schools Study \(LEB9\)](#)
- [Transport Study \(LEB13\)](#)

3.2 Spatial policies:

(i) In the light of the requirements in the PPG [Reference ID:12-002-20140306 *What should a Local Plan contain?*] for clear policies on **what** is intended to happen in the area over the life of the Plan, **where** and **when** this will occur and **how** it will be delivered, is the level of detail shown on the Policies Map and the Maps for each of the main areas, appropriate?

(ii) How does the Plan relate to the concept of Opportunity Areas, and the GLA’s vision for these areas?

LLDC response:

(i) The Draft Revised Local Plan, as submitted, includes an updated Policies Map ([LD6](#)) that continues to include all of the relevant spatial policies that designate areas or space (for example, employment land designations, extent of town centres, Local Open Space, conservation areas), along with site allocations that are included within the Plan. Site Allocations are set out within the Sub Area sections of the Plan and set out expectations for the type, amount and form of development that is expected within the period of the Plan and each includes a map/plan illustrating the site allocation requirements.

(ii) The Plan specifically takes into account and builds on the Mayor of London's [Olympic Legacy Supplementary Planning Guidance \(RPP18\)](#), which was developed to set out the broad London Plan strategy for this upper part of the Lower Lea Valley Opportunity Area. It is now identified as the Olympic Legacy Opportunity Area within the DLP (Figure 2.9 Elizabeth Line East) and the Plan continues to support the Mayor of London's vision for the area in its strategy for achieving Good Growth.

3.3 Neighbourhood Plans: Should the Plan provide strategic guidance on the preparation and content of Neighbourhood Plans in the LLDC area?

LLDC response: The Plan, as submitted, includes paragraph 3.7 and Table 1 (Strategic and non-strategic policies in the Local Plan) which define which policies within the Plan are strategic. In doing so the Plan sets the strategic framework within which Neighbourhood Plans must be prepared and identifies the strategic policies which any Neighbourhood Plan would need to support, in accordance with Paragraph 13 of the NPPF).

Matter 4 – Developing Business Growth, Jobs, Higher Education and Training

4.1 Economic Growth and Job Growth: Are the forecast job growth figures for the Borough realistic?

LLDC response: Yes, the job forecasts are realistic. Four growth scenarios are set out within the [Economy Study \(LEB3\)](#) at Table 7.2, all of which forecast a projected growth in jobs of between 12,500 and 33,000 jobs between 2016 and 2036. Table 2 of the Local Plan also sets out direct jobs from proposals within the area based on data taken directly from planning applications and permissions. Given this information and the subsequent uplift in investment from these key schemes it is considered that the London Growth and Higher Growth scenarios (scenarios 2 and 4 in Table 7.2) are realistic and achievable.

4.2 Developing Business Growth:

(i) Is the **economic strategy** set out in **Objective 1** (increase prosperity in East London) **strategic policy SP1** (Building a strong and diverse economy) and the supporting **policies B1-B6** sufficient to meet the LLDC area's employment and skills needs over the plan period? Does it accord with the requirements in section 6 of *the Framework* for clarity in economic vision, site identification, addressing potential barriers to investment, the locational requirements of different sectors and the need for flexibility? Does the strategy accord with the relevant policies in the London Plan?

LLDC response: The economic strategy set out within Section 4 of the Plan aims to meet the employment and skills requirements identified within the Combined Economy Study ([LEB3](#), [LEB4](#), [LEB5](#) and [LEB6](#)). Policy B.1 provides for employment growth and maintenance of employment land whilst Policy B.2 sets out a strategy for the delivery of identified retail floorspace requirements over the Plan period. Policy B.4 sets out the circumstances when low-cost business space and affordable workspace are required through development and Policy B.5 sets out how and when employment skills training should be secured. Policy B.6 seeks to direct higher education, research and development to the most appropriate locations.

Objective 1, SP.2 and Figure 4 set out the economic vision for the area, applying the town centres first principle from the NPPF to direct main town centre uses to identified centres and other employment uses to employment clusters. The Site Allocations identified within the Plan propose a mix of uses which include employment and/or retail floorspace to meet identified requirements. For example, SA3.1 seeks to provide for employment and retail needs which will help to realise the potential future designation of Stratford as an International Centre as identified in the DLP. There is sufficient flexibility in this strategy to allow for changing context and requirements, for example Policy B.1 places a focus on maintenance of industrial floorspace capacity and Policy B.2 guides retail

floorspace to Stratford but does not place a cap on this provision given the potential for International Centre designation. This strategy emphasising employment intensification and co-location accords with the DLP with respect to DLP Policies E4 to E7; DLP Policy SD4 with respect to the potential CAZ reserve location and DLP Policy SD6 relating to town centres as a focus for expansion.

(ii) Is the focus in **policy B1** (location and maintenance of employment uses) on protecting and developing the existing **business clusters** justified and effective, including applying the sequential assessment of sites to direct large-scale office users towards the **Metropolitan Centre** to support the Central Activities Zone reserve and locating smaller scale office users within the other centres?

LLDC response: the approach within Policy B.1 of protecting employment clusters is justified by the results of the [Economy Study \(LEB3\)](#) at paragraph 7.31 which identifies that a majority of the employment floorspace demand over the plan period is for B1 office development but the report also identifies an increased demand for industrial land. The strategy provides for new office space requirements, directing large-scale office uses to the Metropolitan Centre as the potential CAZ reserve set out within DLP Policy SD4 and smaller-scale office uses as a 'main town centre use' are directed towards the other centres.

Industrial demand will be met through retaining existing floorspace across the area as a whole, and where identified as appropriate within the Plan through intensification and co-location of industrial uses (as identified within Table 3 and the Site Allocations in relation to the employment clusters and B.1 (5) for non-designated sites).

(iii) Does the Plan support **all sections of the business community** within the LLDC area, or are there winners and losers?

LLDC response: as highlighted within paragraph 4.8 of the Plan, the Plan supports a diverse spectrum of employment growth for the area. Although cultural and creative industries are supported through the Creative Enterprise Zone designation, the creation of Grade A office space at Stratford alongside provision of flexible, workspace suitable for a variety of businesses types, reinforced by design approaches (see paragraph 4.19 of the Plan and design policies BN.1, BN.4 and BN.6), and the maintenance of industrial floorspace suitable for heavier industries focussed within the employment clusters mean that there are no 'winners' or 'losers' and all business communities have the opportunity to thrive within the area. This approach is supported through the results of the [IIA \(LD8\)](#) at section 8.1.2.

(iv) Should the Corporation aim to achieve a measure of **self-containment** by the end of the plan period, and if so, should this be included in the Plan?

LLDC response: A level of self-containment is not intended. The [Business Survey \(LEB4\)](#) highlights that many businesses within the area rely on

business links and networks in the vicinity and across London (see page 49). The size of the area does not lend itself to self-containment.

(v) Does the Plan address the issue of **effectively integrating new development with existing businesses and community facilities**, as required to do so in paragraph 182 of *the Framework*, including the requirement for the applicant (or agent of change) to provide suitable mitigation before the development has been completed?

LLDC response: the strategy within the Plan effectively integrates new development with existing businesses and community facilities. The mixed-use growth areas identified within the Key Diagram at Figure 3 integrate new development into the existing urban fabric and specific existing uses will be maintained or re-provided through other Plan policies (see in particular policies B.1, B.2, B.4, CI.1, CI.2). Each of the site allocations also have their own specific requirements for new retail or employment floorspace, social or community infrastructure to effectively integrate new uses. The Agent of Change principle is included within Policy BN.12 which will be applied for all relevant developments, and further guidance is provided for night-time economy uses within the [draft Night-time Economy SPD \(LD22\)](#).

(vi) Is the provision and retention of **low-cost business space (policy B4)** effective or aspirational?

LLDC response: Yes, Policy B.4 is effective and aspirational. The Legacy Corporation has been utilising this approach since the adoption of the Local Plan in July 2015 and has secured over 17,000 sqm of low cost business space/affordable workspace since 2012. The policy clearly defines low cost business space/affordable workspace and in combination with Policy B.1 it sets out the circumstances where such space should be secured.

4.3 Housing/employment Balance:

(i) How well related are the Plan's housing provision and the provision of land and sites for jobs within the likely economic context over the plan period?

LLDC response: The housing trajectory at Figure 9 (and as updated with Annex 1 to this response) shows anticipated housing delivery over the Plan period. Job growth scenarios contained within the [Economy Study \(LEB3\)](#) (see Table 7.2) relate to an uplift in growth and extant permissions. Many of these permissions contain housing and non-residential uses so are directly linked. The approach allows for the intensification of employment land and co-location with other uses, making the most efficient use of land in accordance with paragraph 122 of the NPPF.

(iii) Is there a balance between housing provision and maintaining an adequate supply of employment land?

LLDC response: As highlighted in paragraphs 7.16 and 7.17 of the [Housing Delivery Explanatory Note \(LD27\)](#) the Plan strategy strikes the appropriate balance between meeting housing requirements and providing for employment growth. Policies SP.1 and B.1 allow for consolidation and intensification of employment land where identified in Table 3 and for non-designated sites when industrial floorspace capacity is retained. This will retain an adequate supply of employment land to meet requirements.

4.4 Providing for Efficient Use of Employment Land:

(i) Is **policy B1** (location and maintenance of employment uses) justified in its **protection of employment land**, including Strategic Industrial Locations (SIL)? Does it accord with section 6 of *the Framework* and paragraphs 120 and 121 in section 11 of *the Framework*, and the relevant policies of the London Plan?

LLDC response: Policy B.1 is justified in its protection of employment land, including SIL. As highlighted above, the [Economy Study \(LEB3\)](#) forecasts requirements for employment land and floorspace (see tables 7.6 and 7.10) over the plan period. All scenarios identified a demand for industrial floorspace, and Policy B.1 responds by protecting industrial floorspace capacity whilst providing for other identified requirements, including housing.

In accordance with Section 6 of the NPPF and in combination with SP.1, Policy B.1 sets out a clear economic strategy for the area. Table 3 sets out the appropriate uses for each Employment Cluster, including for example, technology-based industries at Cluster B1.a1. The [Infrastructure Delivery Plan \(TBP4\)](#) identifies the infrastructure requirements over the Plan period and where required, site allocations require appropriate infrastructure investment to unlock delivery (see for example SA4.1 Bromley-by-Bow in relation to a new junction and school provision, which helps then secure delivery of the employment, retail and housing requirements of the site).

In accordance with paragraph 120 of the NPPF, the [Economy Study \(LEB3\)](#) has reviewed employment land availability and the site allocations have been reviewed through the development of the Plan. There is reasonable certainty that the allocations will come forward for the allocated uses and as highlighted within Section 2 of the [2018 AMR \(LEB17\)](#) the majority of the site allocations have a corresponding permission.

Policy B.1 (5) and (6) accord with paragraph 121 of the NPPF by providing appropriate flexibility to deliver identified housing requirements, alongside protecting industrial floorspace capacity. By seeking the provision of flexible employment space within Policy B.1(2) the Plan is also flexible to innovation in employment practices, and paragraph 4.19 also specifically considers the relationship with home based work within this, which is in accordance, in particular with, paragraph 81 of the NPPF.

(ii) The policy covers the **managed release of land to other employment uses** and the importance of mitigating impacts of noise, nuisance and air quality and considering the proximity of incompatible

uses (i.e. between existing and proposed uses). Is the policy robust enough to **adequately safeguard existing living conditions** (especially but not exclusively in relation to residential development)? Does the policy deliver on good neighbourliness?

LLDC response: Where identified in Table 3, Policy B.1(5) allows for co-location of employment uses with residential. Design, in particular, the mitigation of the impacts of noise, nuisance and air quality is a key consideration under Policy B.1(6)(c). Policy B.1(2) and paragraph 4.19 also set out how new employment floorspace should be designed to be flexible in function. This policy is intended to operate alongside specific design policies (see BN.1, BN.4, BN.6, BN.11 and BN.12 in particular) which aim to secure 'good neighbourliness' for all developments within the area, not limited to that containing employment floorspace.

(iii) Does the Plan address the issue of the **strong commercial pressures and resulting hope values to develop housing in traditional industrial areas**, in the interest of safeguarding strategic employment sites on a consistent, rational and viability related basis across the LLDC area? Does policy B1 set out an effective template for overcoming conflict between neighbouring uses, or is it overly onerous and restrictive? Or, alternatively, is there a danger of the Plan becoming **overly prescriptive**, which could ultimately be harmful to the local economy?

LLDC response: Policy B.1 protects the industrial floorspace capacity and densities within the Employment Clusters, and as above, residential development is only acceptable where identified in Table 3. The policy also secures the retention of the industrial floorspace capacity and job densities of other non-designated sites through Policy B.1(5). Aside for some minor changes, it is considered that the approach within Policy B.1 remains broadly unchanged from that already being consistently and effectively applied through the Adopted Local Plan. Therefore, there are no significant anticipated impacts on the potential for hope value within the area. It is considered that the policy strikes an appropriate balance between the level of prescription and flexibility through the application of Policy BN.1(6) and (7).

(iv) Does the Plan recognise the opportunities for **mixed use development** outside centres, and should it also address the issue and potential benefit of **co-location** and if so, should it be giving a clear lead?

LLDC response: The site allocations identify the appropriate opportunities for mixed use development outside the centres. Policy B.1(3) to (5) set out the appropriate opportunities for the co-location of employment and residential uses and Policy B.2 (4) also sets out how proposals for main town centre uses outside the centres will be dealt with.

4.5 Town, neighbourhood and local centres: Is **policy B2** (thriving town, neighbourhood and local centres) justified, effective and in accordance

with national policy, for example as expressed in section 2 of *the Framework*, and the relevant policies in the London Plan? In particular:

LLDC response: the approach within Policy B.2 is justified by the [Retail and Town Centre Needs Study \(LEB6\)](#) which assesses demand for retail floorspace over the plan period (see tables 10.6 and 10.7). In accordance with Section 7 of the NPPF, the town centre hierarchy is set out within Table 4 of the Plan, the extent of the town centre boundaries are included on the Policies Map and the site allocations are appropriate locations to meet the likely scale and development for town centre uses (see SA1.1, SA2.2, SA3.1, SA4.1 and SA4.3). The sequential approach is also embedded within Policy B.2 (3). This approach is in accordance with DLP policies SD6, SD7 and SD8.

(i) Is there a need for **greater locational and/or qualitative guidance** for retail development within or adjacent to town centres or elsewhere?

LLDC response: Policy B.2 provides appropriate locational and qualitative guidance for retail development. Table 4 sets out the town centres hierarchy guiding main town centre uses towards the designated town centres, according to scale and function. Stratford Metropolitan Centre at the top of the hierarchy is therefore the location for a majority of the demand. Policy B.2(1) and (2) also set out qualitative guidance with respect to maintaining A1 presence and active retail frontages in centres.

(ii) Should the Plan set any quantitative parameters for the growth/consolidation of **Stratford town centre**? What is the definition of a major town centre?

LLDC response: As highlighted above, Stratford has potential for International Centre designation. As shown within Figure 6 of the Plan, the Stratford town centre boundary covers the planning areas of the Legacy Corporation and the London Borough of Newham. Table 4 of the Plan (informed by the [Retail and Town Centre Needs Study \(LEB6\)](#)) identifies a demand for around 64,000sqm of comparison retail floorspace to 2036 across the whole of Stratford town centre. It also identifies a likely demand for other A class uses alongside the planned growth at Stratford Waterfront. This figure is therefore supported by evidence but the Legacy Corporation is of the view that it would be inappropriate to cap this requirement considering the definition of International Centres as set out within Annex 1 of the DLP.

(iii) Does the Plan provide sufficient guidance to deliver a successful visitor and **night time economy**?

LLDC response: SP.1 of the Plan proposes the expansion of the cultural, tourist and leisure expansion, directed towards the designated town centres and, as set out within paragraph 12.15 the allocation of sites in Sub Area 3 to become a destination for high-profile visitor, education, sporting and cultural attractions. Stratford Waterfront North (SA3.2) is allocated for mixed use development including cultural, education, leisure and community functions. A [draft Night-time Economy SPD \(LD22\)](#) is also

being prepared to provide guidance for applicants and the development management team with respect to the night-time economy uses. This SPD is 'hung' from policies SP.1, B.1, B.2, B.3, B.4 and Policy 3.2 in particular and will be adopted alongside the revised Plan.

(iv) Should the Plan make provision for a specific quantum or **range of retail floorspace** in the town and local centres which would be deliverable within the plan period?

LLDC response: Table 4 of the Plan sets out broad retail requirements for each of the town centres over the plan period. Each of the centres has a site allocation, being the location for the anticipated retail floorspace.

(v) In relation to the cumulative impact of **hot-food takeaways**, is there a need for more detailed criteria to make the policy effective and consistent in its application across the LLDC area?

LLDC response: It is not considered that there is a need for more detailed criteria in relation to the impact of takeaway facilities within the Plan itself. In accordance with DLP Policy E9, paragraph 4.26 provides locational guidance of more than 400m from existing or proposed schools. The [draft Night-time Economy SPD \(LD22\)](#) provides additional guidance in relation to assessing the impact of such uses. It sets out that proposals for new takeaway facilities should submit Management Plans covering noise, vibration, odour, traffic disturbance and litter.

4.6 Skills and Access to Employment: Is **policy B5** (increasing **local access to jobs**, skills and employment training), which aims to secure "appropriate commitments and targets" for employment skills, training and job opportunities for local residents, justified, and in accordance with national policy and the relevant policies of the London Plan? How realistic is this policy to implement? What would be its likely impact on the local economy?

LLDC response: Policy B.5 seeks to secure 'appropriate commitments and targets' for employment, skills and training from major schemes within the area. It is considered that this trigger is appropriate given the likely construction value of such schemes and it also contributes to the concept of convergence by securing opportunities for enhancing the skills and training of local residents as set out within the Strategic Regeneration Framework. The Legacy Corporation has been applying this policy since the adoption of the existing Local Plan in 2015 and as shown within the [2018 AMR \(LEB17\)](#), seven S106 agreements included measures to enhance employment skills and training such as apprentices, maximising recruitment of local residents and securing the London Living Wage.

Matter 5 – Section 5 – Providing Housing and Neighbourhoods

5.1 Overall housing need and provision: Objective 2 of the Plan aims to deliver more than 22,000 new homes between 2020 and 2036 (i.e. 1,375 dwellings per annum (dpa)) within a range of sizes, types and tenures, which are accessible and affordable to a 'broad spectrum' of the community together with the fast delivery of at least two new primary schools and the delivery of sufficient new health and general community meeting spaces, including space suitable for faith use. **Strategic policy SP2** (maximising housing and infrastructure provision within new neighbourhoods), however, commits to delivering in excess of the emerging London Plan target of 2,160 dpa on suitable and available sites. Given the extent of the housing need for the LLDC which is set out in the emerging Draft London Plan and with reference to section 5 of *the Framework* (Delivering a sufficient supply of homes):

(i) Does the submitted Plan accord with the Government's **prioritisation of the delivery of new homes**, as expressed in its recent White Paper and in *the Framework*, for example in paragraph 59, or is the Plan unnecessarily cautious in terms of housing delivery?

LLDC response: Section 5 of the Draft Revised Local Plan effectively prioritises housing delivery within the context of the strategy set out within the Key Diagram at Figure 3. As highlighted above the strategy allows for the intensification of employment uses to allow for the co-location with development; residential uses are encouraged within the town centres in accordance with Policy B.2; housing schemes should optimise the potential of the site through SP.2 (1); and small sites delivery boosted through Policy H.1. As set out within the [Housing Delivery Explanatory Note \(LD27\)](#) it is considered that the approach strikes the appropriate balance between housing delivery and economic growth and that allocating any additional sites for housing delivery would have significant implications on the wider regeneration aims of the organisation as a whole as set out within paragraphs 7.16 and 7.17 of the Note.

(ii) Should the overall housing need figure for LLDC remain as set out in the **submitted Plan**, in accordance with the provision of the **emerging London Plan** (or Draft London Plan – DLP);

LLDC response: The Plan's housing target utilises the figure contained within the DLP. This figure is capacity based with an assumption from small sites and non-self-contained delivery sources. This is the only appropriate basis for setting the target as the Legacy Corporation is not a borough. This means that there is a lack of nationally available data for its area meaning that it is not possible to utilise the 'standard' methodology for determining housing need. However, the [Housing Requirements Study \(LEB2\)](#) utilised the most appropriate sources of data, including the [Population Projections Report \(LEB1\)](#), to determine what could reasonably be considered to be the 'need' arising within the area, generating an objectively assessed need (OAN) of up to 619 units per annum (see Figure 27). This demonstrates that the Legacy Corporation is providing for housing need arising from outside its area and utilising this lower housing

figure would not provide for the strategic housing requirements of London as a whole.

(iii) Does the Plan provide sufficient evidence to demonstrate that its target of greater than 2,161 dpa can be implemented over the plan period, i.e. **is the Plan realistic?**

- If not, is there an argument for **greater intensification**, e.g. in areas of previously developed land (PDL) and other areas of opportunity?
- Paragraph 5.3 of the Plan summarises the component sources of the Plan's housing supply; a more detailed statement from the LLDC, entitled '**Housing Delivery Explanatory Note**' (Examination Document LD27), goes some way towards providing the required level of detail, but falls short of providing data showing realistic yields from each source.
- A **Statement of Common Ground** between the LLDC and the principal housing developers and consultants, covering the realistic yields from each source and the reasons for the areas of disagreement, would be helpful in assisting the Examination in relation to a critical soundness consideration of the Plan.

LLDC response: The Plan makes a reasonable assumption about housing delivery over the plan period. As set out within Table 17 of the Plan ([LD5](#)), and in greater detail within Appendix 2 of the [Housing Background Paper \(TBP2\)](#) (as updated in Annex 1 [LD331](#)) approximately 58% of housing delivery within the area over the plan period of 2020-2036 relates to existing permitted schemes. The Legacy Corporation area has a good track record of permitted schemes being built out, where no permissions have lapsed. Therefore there is reasonable certainty that permitted residential schemes will be delivered as planned. The remaining 42% comes from site allocations (making up a minimum of 25%) and additional capacity outside of the site allocations and as identified within the [London SHLAA \(RPP10\)](#) (making up the remaining 17%). In addition to these known sources of housing delivery Policy H.1 seeks to boost delivery from small sites.

The Legacy Corporation does not apply any strict limits on density. Paragraph 5.15 of the Plan sets out how proposals will be expected to optimise housing delivery, and Figure 10 sets out these density considerations. Policy BN.5 deals with tall buildings directing taller buildings to the centres and setting out considerations for assessing appropriateness of proposals above the 'predominant' or 'generally expected' height threshold. As an opportunity area, the highest density assumptions were used by the GLA in calculating housing capacity within the SHLAA and the Legacy Corporation monitors delivery against these general assumptions, finding that in general delivery keeps pace with these assumptions. Accordingly it is considered there is no need to set out any specific parameters to ensure greater intensification.

The Legacy Corporation frequently engages with the key developers of housing sites to keep the delivery information within the Housing Trajectory up to date. To assist in this response it has approached these key developers again in July 2019 and confirmations have been received

as set out within Part A of Annex 1 to this response. See question 5.2 below for information relating to the most up-to-date Housing Trajectory.

(v) Is the **housing trajectory** realistic, and should the Plan set out the anticipated rate of development for specific sites, as mentioned in paragraph 73 of *the Framework*?

LLDC response: The housing trajectory at Figure 9 contains average delivery figures spread over a five-year period by calendar year from 2018 to 2036. As highlighted in the [2018 AMR \(LEB17\)](#) there are over 4,500 units currently under construction therefore delivery over the next two to three years is reasonably certain.

Due to the Housing Delivery Test requirements, the Legacy Corporation has updated its trajectory to a financial year basis and this is contained in Annex 1 to this response. This has involved extensive developer engagement, as highlighted in the correspondence at Part A of Annex 1 to this response, and therefore this is considered up-to-date and realistic.

It is proposed that this new trajectory replaces the current Figure 9 within the Plan. This is also deemed appropriate given the likely adoption of the Plan at the end of the 2019/2020 financial year. Monitoring on a financial year basis has very limited implications for the conclusions relating to housing delivery, for example delivery is still expected to be cumulatively met up until around 2028/2029. The Legacy Corporation will continue to publish a new housing trajectory annually within the Authority Monitoring Report (AMR) which keeps this up to date. Any delivery issues will therefore be picked up early on and, if required, measures as set out within paragraph 5.4 of the Plan will be introduced.

Appendix 2 to the [Housing Background Paper \(TBP2\)](#) also shows greater detail on the rate of development from specific sites with a focus on the permissions and the site allocations. This table has also been updated to a financial year basis, as contained within Part B of Annex 1 to this response.

5.2 Five Year Housing Land Supply: With reference to paragraph 73 of *the Framework*:

(i) Would the Plan at adoption be able to demonstrate that it has a five-year supply of **specific, deliverable sites** sufficient to provide five years' worth of housing?

LLDC response: The Plan on adoption would be able to demonstrate a 5-year supply of specific, deliverable sites. Table 1 below shows anticipated housing delivery over the first five years i.e. 2020/1 to 2024/5 on a financial year basis. The five-year housing figure based upon the DLP figures equates to 10,805 and is expected to be exceeded within the first five years. As highlighted above, this is well in excess of the equivalent OAN for the area.

Table 1- Five year supply

Year	Anticipated delivery
2020/21	1579
2021/22	2033
2022/23	2537
2023/24	2710
2024/25	2075
5-year total	+129

All these sites are considered to be 'deliverable' in accordance with the NPPF definition as the delivery data originates directly from developers, and 55% of this relates to sites under construction or with full planning permission. The remainder is based upon direct developer engagement and approximately 43% of this will be delivered by the Legacy Corporation.

Additionally, as highlighted within Section 5.1 of the Housing Background Paper (TBP2) the Legacy Corporation has chosen not to include a small sites assumption within the first five years of the plan period. However, there is evidence within the Authority Monitoring Reports ([LEB14](#), [LEB15](#), [LEB16](#) and [LEB17](#)) to suggest that such sites are likely to yield approximately 15 units per annum, or 75 additional units over the first five-year period.

(ii) What are the **key assumptions**/parameters which the Plan has relied on to calculate its 5 years housing land supply (HLS), such as whether it assumes a 5% or 20% buffer and whether the buffer should be factored in for just the first 5 years or for the plan period as a whole? A technical note from the LLDC would assist the Examination.

LLDC response: The Legacy Corporation has relied on evidence-based assumptions to determine what is included within the first five years of the plan period (2020/2021-2024/5). As shown in Annex 1 to this response this is based on developer engagement where the following applies:

Table 2- Components of five year supply

First five years	% of 5 year	Assumption
Under construction	33%	Phased delivery from major schemes or sites with detailed permission under construction
Full planning permission	14%	Sites with detailed planning permission
Outline permission with reserved matters	8%	Phased delivery from major schemes

Outline	36%	Clear evidence from developers that housing completions will begin on site within five years.
Site Allocations	10%	Progressed pre-application discussions with developers with clear evidence to confirm intention to begin housing completions on site within five years.

As set out above it is anticipated that delivery will exceed the target over the first five years but with a buffer of approximately 1%. This has decreased from the previous 5% calculated on a calendar year basis as this delivery is frontloaded to 2019 and 2020 calendar years but outside the 2020/21 financial year. However, as described within paragraphs 7.14 to 7.17 of the [Housing Delivery Explanatory Note \(LD27\)](#) due to the nature of the area it is not possible to identify any additional sites to amount to a 20% buffer as required by the NPPF without impinging significantly on the strategy of the Plan, particularly its economic development aims, and the aims and purpose of the Legacy Corporation as a whole. However, it is considered that subject to detailed scheme design and assessment against other policies in the Plan it may be possible to increase density on some sites while continuing to deliver high quality schemes. While it is not considered possible or practical to identify a higher buffer, this does leave the potential for actual greater delivery on a site by site basis as individual schemes are developed and assessed.

(iii) What are the **component sources** of the Plan’s 5-year housing supply?

LLDC response: The above Table 2 shows the component sources of the first five years’ supply. It shows that 44% of delivery arises from outline schemes, however around 43% of this is to be delivered by the Legacy Corporation itself and the remainder relates to latter phases of partially built out schemes.

5.3 Housing Mix: Are **policies H1** (providing for and diversifying the housing mix); **H3** (meeting the needs of older person households); **H4** (providing student accommodation); **H6** (houses in multiple occupation ([HMOs])); **H7** (shared living accommodation); and **H8** (innovative housing models), justified, effective and in line with national policy, as set out in section 5 of *the Framework* and the relevant policies in the London Plan? In particular:

(i) Should the Plan address the issue of **self-build housing**?

LLDC response: The Legacy Corporation is not a ‘relevant authority’ as defined within Section 1(3) of the Self-build and Custom Housebuilding Act 2015 therefore it has no statutory duty to produce a self-build register. However, the Plan references how self-build proposals will be considered alongside other forms of housing in paragraphs 5.3 and 5.15.

(ii) Is the need for **family housing** adequately addressed in the Plan?

LLDC response: Yes, the Plan adequately addresses the need for family housing. Family accommodation is defined in the glossary as having more than three bedrooms. SP.2 (3) specifically references the need for family housing and Policy H.1 (2) states that all proposals should integrate a mix of unit and tenure types including family housing. The policy expects proposals to provide a 'balanced mix' of one, two and three-bedroom properties, and in addition the Plan identifies a number of different circumstances where a focus for family accommodation is given. Policy 2.1 states that proposals within Sub Area 2 will be required to provide an emphasis on family housing, also reflected in site allocations SA2.1, SA2.2, SA2.3 and SA2.4. Site Allocation SA4.3 also requires a family-focus of accommodation types, and the [Pudding Mill SPD \(LD23\)](#) at section 6b also sets out further guidance on how this family-focus should be interpreted and delivered across the site.

(iii) Regarding **HMOs**, should policy H6 provide more focused direction, for example to ensure HMOs should have suitable access to infrastructure? Is there a danger that HMOs could displace the potential for meeting 'mainstream' need?

LLDC response: It is not considered necessary to provide more focussed direction to ensure HMOs have suitable access to infrastructure as this principle is implicit in the Plan through Policies CI.1 and SP.4. The Legacy Corporation has not received any applications for HMOs within the area since taking on planning powers and therefore does not consider that this is a risk. Proposals for shared living schemes will be dealt with via Policy H.7 which directs such proposals to the most appropriate and accessible locations.

- 5.4 Affordable Housing:** with reference to **strategic policy SP2** (maximising housing and infrastructure provision within new neighbourhoods) and **policy H2** (delivering affordable housing):
- (i) In the light of the **strategic thresholds for affordable housing** (AH) set out in strategic policy 2 (i.e. 35% minimum across the area and 50% on a habitable room basis (in line with DLP policy H6)), is **strategic policy SP2** justified and effective? For example, is the policy justified and effective in relation to:
- (a) what it **defines as AH**;
 - (b) in its overall **AH percentage target**; and
 - (c) its proposed **tenure mix** and **viability** requirement?
- Should provision be made for a more flexible tenure split where schemes exceed 35% AH?
- (ii) Should AH be calculated by **habitable room**?
- (iii) How far should the Plan go in ensuring that **AH is integrated** into proposed residential areas, as opposed to off site provision?
- (iv) Is **policy H2** a 'soft touch' in allowing **off-site AH provision**?

LLDC response:

- (i) Strategic Policy SP.2 is justified and effective.

(a) As set out within paragraphs 5.20 and 5.21 of the Plan, Policy H.2 defines affordable housing in accordance with the DLP which includes London Affordable Rent, and London Living Rent and London Shared Ownership in the Intermediate category. Minor modification **MM64** has been put forward within [Schedule of Proposed Post-Publication Modifications \(2019\) \(LD20\)](#) to specifically include these definitions within the glossary.

(b) Policy SP.2 (2) and paragraph 5.5 (including minor amendment 18) clearly set out the Legacy Corporation's affordable housing target of 35% across the area, achieving at least 50% on publicly-owned or industrial land. This is applying the approach of the Mayor's [Affordable Housing and Viability SPG \(RPP4\)](#), with justification of this approach confirmed within the [Local Plan Viability Study \(LD12\)](#). As highlighted within section 5.5 of the [Housing Background Paper \(TBP2\)](#) this Study confirmed that some schemes can achieve around 35% affordable housing, with policy compliant splits of 60/40, and some were in excess of this, but on average across the area 25 to 35% can broadly be achieved. As set out within paragraph 5.21 of the Plan the Legacy Corporation applies the SPG approach which allows for the Viability Tested Route if schemes are unable to achieve 35% (or 50% affordable housing, where applicable) which provides appropriate flexibility.

(c) As explained within section 5.5 of the [Housing Background Paper \(TBP2\)](#) the affordable housing tenure mix is supported by evidence from the [Housing Requirements Study \(HRS\) \(LEB2\)](#) and the [GLA Strategic Housing Market Assessment \(RPP9\)](#). As set out at paragraph 5.83 of the HRS there is a greater need for low cost rented products within the Legacy Corporation area with a 61/39 (low cost rented/intermediate) split, however wider London strategic requirements (table 1 within the SHMA) set out 72/27 split in favour of low cost rented products. The results of the viability testing suggest that viability is challenging for some typologies at a 60/40 split therefore any increase in proportion of low cost rented products could impact significantly on the viability of schemes. Therefore, in the interests of balance, it is appropriate to maintain the 60/40 split currently being applied within the [adopted Local Plan \(LD1\)](#).

It is not considered necessary to put into policy additional flexibility for schemes delivering in excess of 35% affordable housing as this would generally be negotiated on a case by case basis by officers.

(ii) In accordance with Policy H6 of the DLP and the [Affordable Housing and Viability SPG \(RPP4\)](#) affordable housing should be calculated by habitable room. The Legacy Corporation however will continue to monitor delivery on both a habitable room and unit basis, and as highlighted in paragraphs 5.44 and 5.50 of the Plan LLDC may also seek additional population density information to make a comparison in more innovative housing models, where appropriate.

(iii) and (iv) Policy H.2 is clear that affordable housing should be provided on site and be well-integrated into the proposed development, unless there are exceptional circumstances. This approach is in accordance with

Policy H.5 of the DLP which states that affordable housing must only be provided off-site or as a cash in lieu contribution in “exceptional circumstances”, and a minor modification has been included in the [Schedule of Proposed Post-Publication Modifications \(2019\) \(LD20\)](#) to reinforce this position at **MM19**. Paragraph 5.22 of the Plan deals with the integration of affordable housing within a proposed development and **MM21** has also been proposed within LD20 to provide greater detail on the consideration of this.

5.5 Gypsies and Travellers: Is **policy H5** (location of gypsy and traveller accommodation) justified and effective, and is it in line with national policy as set out in *Planning Policy for traveller sites* (August 2015)?

LLDC response: Policy H.5 seeks to protect existing gypsy and traveller accommodation and provides a criteria-based approach to the assessment of sites for new gypsy and traveller accommodation. The supporting text at paragraph 5.34 also sets out the pitch requirement, where there is a need for nine pitches to meet the national definition within the PPTS and a further 15 to meet the new definition within the DLP. Site Allocation 1.7 allocates a new gypsy and traveller site at Bartrip Street South and as highlighted within the [Housing Background Paper \(TBP2\)](#) the Legacy Corporation has been working with its partners to help secure its delivery within the first five years of the plan period. As highlighted within paragraph 5.35 of the Plan. the Legacy Corporation has made a commitment to monitor need requirements and work with the neighbouring borough to address this wider strategic requirement. Details of meetings taken place are set out within Appendix 3 of the [Housing Background Paper \(TBP2\)](#) and summary within paragraphs 7.16-7.19 of the [Duty to Cooperate Background Paper \(TBP8\)](#). It is therefore considered that this approach is justified by the evidence within the [Housing Requirements Study \(LEB2\)](#) and meets the national policy requirements.

5.6 Community Infrastructure: Are **policies CI.1** (providing new and retaining existing community infrastructure; and **CI.2** (planning for and bringing forward new schools), justified, effective and in line with national policy, especially as set out in section 8 of *the Framework*, and the relevant policies in the London Plan? In particular, is there sufficient **schools’ capacity** for the plan period, including the safeguarding of land?

LLDC response: No changes have been proposed to policies CI.1 and CI.2, as through the process of reviewing the Adopted Local Plan these policies were found to be in line with national policy and the DLP. These policies have been tested in line with the other policies in the Plan and continue to provide a high level of protection for existing community infrastructure within the Legacy Corporation area as well as requiring new development to deliver appropriate amount of additional community infrastructure on new development. The Legacy Corporation’s approach to schools and schools’ capacity is informed by the [Schools Study \(2018\) \(LEB9\)](#) and following this has been set out in the [Schools Explanatory Note \(2019\) \(LD28\)](#). These documents highlight the level of delivered and

planned schools provision within the Legacy Corporation area and the strategic nature of planning for schools.

Matter 6: Section 6 – Creating a High-Quality Built and Natural Environment

6.1 Strategic Open Space Considerations: Is **Objective 3** (high quality built and natural environment, integrated with waterways, green space and the historic environment); **strategic policy SP3** (integrating the natural built and historic environment); and **policies BN1** (responding to place); **BN2** (creating distinctive waterway environments); **BN3** (maximising biodiversity); **BN7** (protecting Metropolitan Open Land); and **BN8** (improving local green space), justified and realistic for the LLDC area and in line with both national policy, as set out in sections 15 (conserving the natural environment) and 16 (conserving the built environment) of *the Framework*, and the relevant policies in the London Plan? In particular:

(i) Should there be a specific policy aimed at maintaining and enhancing the **public realm**, including impact on waterway environments?

(ii) Are any of these policies overly **prescriptive**, to the extent that they are counter-productive?

(iii) Will the Plan achieve a completely 'joined up' network of **canal-side/riverside routes** across the LLDC area?

(iv) Will the Plan achieve a completely 'joined up' network of **wildlife corridors** and informal **recreational routes** across the LLDC area?

LLDC Response:

The natural and built environment policies have been reviewed and where necessary amended to address relevant changes within the NPPF (as set out in sections 15 (conserving the natural environment) and 16 (conserving the built environment)) and the relevant policies in the DLP. They have also been informed by the latest available evidence on these matters (including the [Open Space and Playspace Study \(LEB7\)](#) and therefore considered justified and realistic. The rationale for proposed changes and how the NPPF and DLP have been taken into account is set out within the [Natural and Built Environment Background Paper \(TBP3\)](#). Monitoring information has also shown that these policies as set out in the Adopted Local Plan have proved effective in achieving their main goals.

(i) It is considered that the natural and built environment policies, along with other relevant policies within the Plan, Sub Area policies and site-specific development principles, work effectively together to provide an appropriate level of policy capable of achieving improved and well maintained public realm across the LLDC area. In particular Policies BN.1 (Responding to place), BN.4 (Designing Development) and BN.5 (Proposals for tall buildings) provide a comprehensive approach to design

including external and public spaces, while Policy BN.3 (Maximising biodiversity) and BN.8 (Improving local open space) work together to ensure that biodiverse and high quality public spaces are achieved. The Plan also includes policies that are specifically aiming at achieving improved public realm on sub area level (Policy 2.2 Leyton Road – improving the public realm; Policy 1.4 Improving the public and public realm in Hackney Wick and Fish Island).

(ii) It is not considered that any of these policies are overly prescriptive but rather rely on proposals achieving acceptable standards that are appropriate to the context and circumstances of the development in question, with the Plan encouraging the utilisation of design review and linking this to relevant design and other technical guidance. Authority Monitoring Reports ([LEB14](#), [LEB15](#), [LEB16](#), [LEB17](#)) show evidence that approved schemes have been able to meet the relevant Plan KPIs on design and biodiversity (KPIs 5 and 7 in the Adopted Local Plan).

(iii) The Plan contains set of policies that are designed to improve the waterway environment and improve access to and along the waterways. Policy T.6, Figure 25, shows routes that are identified as needed and/or to be improved. This clearly shows that the Plan is set to achieve a complete 'joined up' network of canal-side/riverside routes across the LLDC area. Furthermore, relevant site allocations policies provide principles on how developments are expected to achieve this on site-allocation level. The LLDC has also prepared area-specific supplementary planning documents that include further guidance on achieving this vision, submission documents: [Pudding Mill \(LD23\)](#), [Bromley-by-Bow \(LD24\)](#) and [Hackney Wick and Fish Island \(LD25\)](#).

(iv) The map at Figure 15, page 103 ([LD5](#)), of the Plan, shows a network of local open spaces that will be protected over the Plan period. This also shows that these designated open spaces create a joined-up network. The Policies Map shows that most of these spaces are also designated as Metropolitan Open Land and thus enjoy the highest level of protection. The latest evidence produced, [Open Space and Play Space Assessment \(2018\) \(LEB7\)](#), shows detailed information on the quality and quantity of these corridors and Appendix B of this document [LEB7A](#) provides evidence of their accessibility and also includes a comprehensive assessment of individual site performance. Furthermore, Policy BN.1 has been updated to ensure that new proposals connect new and existing habitats to provide wildlife corridors (Change Reference Number C144, [Schedule of Changes Document \[LD4\]](#)). The network of open spaces also provides the opportunity for informal recreation, particularly green spaces along the waterways and canals that form a Strategic Walking Route, as shown on the Policies Map ([LD6](#)).

6.2 Quality of Design: Are **policies BN4** (Designing development) and **BN6** (requiring inclusive design), justified and sufficiently robust to meet not only existing challenges but those which could arise from the likely intensification of development over the plan period? Do they accord with national planning policy, as expressed in section 12 of *the Framework*, and the relevant policies in the London Plan?

LLDC response: it is considered that the design policies within the Plan provide an appropriate level of policy that will be capable of providing the tools to ensure creation of high quality buildings and places and are grounded in an understanding of the defining characteristics of the locations that make up the Legacy Corporation area, as required by Section 12 of the Framework. This is underwritten by a Characterisation Study (Document LEB10 [Part1](#), [Part2](#), [Part3](#), [Part4](#), [Part5](#)), a draft of which has been submitted alongside the Plan, three recent area based supplementary planning documents ([LD24](#) for Bromley-by-Bow, [LD23](#) Pudding Mill and [LD25](#) Hackney Wick and Fish Island), relevant conservation area appraisals and a range of other evidence and analysis that have informed both the original policies in the Adopted Local Plan and their reviewed versions in the submitted Plan, with these identified in detail within the evidence lists included at the end of Section 6 of the Plan and each of the sub area sections of the Plan.

These policies continue to draw on the Government's optional technical standards, as in the Adopted Local Plan, including the National Described Space Standards – Technical Requirements and also Optional Requirement M4(2) Category 2 and Optional Requirement M4(3) Category 3 of Part M of the Building Regulations. Each policy also specifically identifies its relationship to relevant policies in the DLP and Mayor of London's Supplementary Planning Guidance.

In combination with the overall strategy within the Plan that seeks to optimise the development potential within this opportunity area, and with the other policies in the Plan, the design policies are considered to provide a comprehensive suite of policy tools to assess and determine development proposals robustly over the plan period as the development of the area intensifies. Over the period since the adoption of the Local Plan in 2015, consented development proposals have consistently delivered greater levels of housing than assumed as a result of the previous London SHLAA outcomes for the Legacy Corporation area, while being capable of meeting the policy tests in the London Plan and the Local Plan. Amendments that have been made to these policies build on the outcomes of monitoring, experience of implementation and consultation and engagement since then and aim to rationalise and improve the policies within the Adopted Local Plan.

6.3 Tall Buildings: Is **policy BN5** (proposals for tall buildings) justified and effective, and in line with national policy as set out in section 12 of *the Framework* and the relevant policies in the London Plan, and in particular:

(i) Is the policy **definition of tall buildings** to be “those that are higher than a Sub Area’s prevailing or generally accepted height (as set out in tables 10, 11, 12, and 13)” appropriate for the LLDC area? If not, what is an appropriate and justified definition for tall buildings in the Plan Area?

LLDC response: this policy definition has been retained in full from that contained within the Adopted Local Plan and is related to the context of locations within, and circumstances of, the Legacy Corporation area. Experience in use of the adopted policy, including this definition, has proven that it is a robust and generally accepted definition and approach. ‘Prevailing’ takes account of the existing context in locations that are already primarily developed, while ‘generally expected’ take account of the locations that are mainly cleared but consist of large development sites, often with an outline or full planning permission(s) that sets an assessed and approved parameter or height and thereby an expected height characteristic. In each case this provides a baseline against which new proposals can be assessed in context.

(ii) Is the general focus of the Plan, to **locate tall buildings within the Centre boundaries** as defined in the Plan, justified? Do all these areas have high PTAL ratings?

LLDC response: this is considered to be a justified approach given that the existing and proposed new centres within the Legacy Corporation area are focused around public transport hubs and have, or will have significant levels of tube, train and bus accessibility. Stratford Metropolitan Centre and East Village Local Centre benefit from the very highest PTAL ratings, predominantly 6a. Bromley-by-Bow potential District Centre is very high at between PTAL 5 and 4. The proposed local centre at Pudding Mill currently has PTAL ratings of between 3 and 2 but is projected to improve to 2031 and is centred on the Pudding Mill DLR station providing easy access to the significant public transport hub at Stratford Regional Station. Hackney Wick Neighbourhood Centre currently ranges between PTAL 3 and 4 and provides rail and bus access to Stratford and wider Hackney and other more central London locations to the west. The approach within the policy is also sufficiently flexible to allow tall buildings outside of the centres where the relevant policy criteria are met, including consideration of the contribution to or effects on the character of that area.

(iii) Should the policy be extended to other areas with **good public transport access**?

LLDC response: see response to 6.3(ii) above.

(iv) Should the heights of tall buildings be subject to a **more flexible/less prescriptive interpretation**, such as a range of heights, for example should each tall building proposal be determined through a set of parameters or a masterplan?

LLDC response: the policy does not set prescriptive heights for buildings in any particular location but rather sets a 'prevailing' or 'generally expected' height above which the tests in the policy will be applied in order to assess the acceptability of that tall building. It is considered that this provides sufficient flexibility in approach for appropriate design solutions to be developed for development proposals within the context and circumstances of the site in question. Design Review by the Legacy Corporation Quality Review Panel is also considered to aid a design led approach to addressing the requirements of the policy.

(v) How valid are the concerns that tall buildings **cause alienation**, or is this a matter that can be overcome by sensitive design?

LLDC response: it is considered that the range of tests set out in the policy provide sufficient tools to ensure that tall buildings are appropriately designed and take into account the needs of both their occupants and those occupiers and users of surrounding development and spaces.

6.4 Play areas: Is **policy BN9** (maximising opportunities for play), justified, effective and in line with national policy as set out in section 8 of *the Framework* and the relevant policies in the London Plan?

LLDC Response: Policy BN.9 has been reviewed and updated in line with the best practice, the DLP and also reflects the Mayor's [Shaping Neighbourhoods Play and Informal Recreation SPG \(RPP19\)](#). The policy has also been informed by the robust and up to date assessment of need for open spaces and play spaces [Open and Playspace Study \(2018\) LEB7](#). The rationale for the changes proposed to this policy is detailed in the [Natural and Built Environment Background Paper \(TBP3\)](#).

6.5 Key Views: Is **policy BN10** (protecting key views), justified, effective and in line with national policy as set out in the relevant policies in the London Plan?

LLDC Response: Policy BN.10 (formerly BN.9) has been reviewed and updated in line with the DLP Policy HC3 (Strategic and Local Views) as well as the Mayor's Supplementary Planning Guidance on the management of the designated views – the [London View Management Framework Supplementary Planning Guidance \(LVMF SPG\) \(RPP20\)](#).

- 6.6 Air Quality:** Is policy **BN11** (air quality), justified, effective and in line with national policy as set out in section 15 of *the Framework* and the relevant policies in the London Plan?

LLDC Response: Policy BN.11 requires new developments to contribute to improving air quality through appropriate construction, design, transport planning practices, as well as appropriate use of green infrastructure; it also requires major developments to be at least air quality neutral in line with DLP Policy SI1. The policy also requires developments to take into account the presence of Air Quality Management Area or London Plan Air Quality Focus Area as required in sections 16 (paragraph 179) of the NPPF. Policy BN.11 has been also amended through the [Schedule of Proposed Post-Publication Modifications \(2019\) \(LD20\)](#) which inserts modifications **M7** and **M8** to take account of mitigation measures identified within the HRA Appropriate Assessment report at Appendix C of [IIA \(LD8\)](#), Section 6.3 Mitigation Measures.

- 6.7 Noise:** Is policy **BN12** (noise), justified, effective and in line with national policy as set out in section 15 of *the Framework* and the relevant policies in the London Plan? Does it demonstrate compliance with the **Agent of Change** Principle?

LLDC response: The revised noise policy in the Plan (BN.12) addresses the London Environment Strategy goals and new approach in DLP policies D12 (Agent of change) and D13 (Noise) on the 'Agent of change' principle. Furthermore, the Agent of Change principle has also been referenced in Policies B.1 (Locations and maintenance of employment uses) and B.2 (Thriving towns, neighbourhoods and local centres). The policy also requires development proposals to minimise exposure to the adverse impacts of noise, in line with the NPPF. Further guidance on the Agent of Change Principle is provided within the [draft Night Time Economy SPD \(LD22\)](#).

- 6.8: Other environmental policies:** Are policies **BN13** (protecting archaeological interest); **BN14** (improving the quality of land); **BN15** (designing residential extensions); **BN16** (designing advertisements); and **BN17** (conserving or enhancing heritage assets), justified, effective and in line with national policy as set out in the relevant sections of *the Framework* and the relevant policies in the London Plan?

LLDC response: Monitoring of the existing policies in the Adopted Local Plan has helped to demonstrate that these policies have proved effective in achieving their main goals. There have not been any major changes in policy or guidance on the local, national and London level in relation to these. It is considered that they remain relevant, effective and in line with national policies and policies in the London Plan. In light of new evidence, some minor changes have been proposed to policies BN.13, BN.14 and BN.17 in order to keep them up to date and effective. A detailed rationale

for the proposed changes is set out in the [Built and Natural Environment Background Paper \(TBP3\)](#).

Matter 7: Section 7 – Securing Transport Infrastructure to support Growth:

7.1 Strategic Transport: Is **Objective 4** (securing the infrastructure to support growth and convergence); **strategic policy SP4** (planning for and securing infrastructure to support growth and convergence); and **policy T1** (strategic transport improvements), justified, effective and consistent with national policy as expressed in section 9 (promoting sustainable transport) of *the Framework*, and the relevant sections of the London Plan, and in particular with regard to:

- (i) Whether the **major schemes** outlined in **policy T1** are realistic, i.e. either programmed or likely to be implemented within the plan period, or whether they are aspirational?
- (ii) Does the evidence point to the DLR and/or other public transport modes having **sufficient capacity** to accommodate peak hour flows if the proposed development comes to fruition during the plan period?
- (iii) Are all the key linkage/**connectivity issues** addressed in the Plan?

LLDC response: As part of the review process culminating in the Legacy Corporation's Draft Revised Local Plan a range of evidence based was put together to provide an updated picture as to transport capacity in the area, projects that have been delivered and those which are still needed to support development in the area. The changes made to Objective 4 (securing the Infrastructure required to support growth and convergence), strategic policy SP.4 (Planning for and securing transport and utility infrastructure to support growth and convergence) and policy T.1 (Strategic transport improvements) reflect the updated context and evidence set out in [Transport Study \(2018\) \(LEB13\)](#), [Infrastructure Delivery Plan \(2018\) \(TBP4\)](#) and [Transport Background Paper \(TBP5\)](#). These policies continue to be consistent with national policy, specifically section 9 of *the Framework*, and all policies within section 7 (Securing transport infrastructure to support growth) have been updated to reflect updated targets around modal change and healthy streets as set out in the Draft New London Plan. The major schemes outlined in policy T.1 are identified within the Legacy Corporation's [Infrastructure Delivery Plan \(TBP4\)](#) and include a range of schemes, from those that are currently underway, such as improvements to Stratford Station access and works to improve the strategic road network within the Legacy Corporation area and improve routes to encourage multi-modal usage, to larger more strategic schemes that include the need to work with partner agencies and stakeholders, whilst these are realistic within the plan period, their delivery is reliant on other actors which may impact on timescales. The Legacy Corporation's [Infrastructure Delivery Plan \(TBP4\)](#) identifies the key challenges around linkages and connectivity in the area and these are in

turn addressed in the plan. A further Transport Capacity Explanatory Note ([LD34](#)) has been prepared and is contained at Annex 2 to this response to further clarify the Legacy Corporation's position in relation to transport capacity. This document sets out that the level of new development set out within the Local Plan, whilst it adds to pressure on rail transport in the LLDC area, is only part of this pressure, and that analysis by TfL indicates that with the introduction of Elizabeth Line services these combined impact are able to be accommodated. This document also sets out the work that has already been done in the area to increase capacity in advance of growth taking place.

7.2 Promoting Sustainable Transport: Are **policies T2** (transport improvements); **T3** (supporting transport schemes); **T4** (promoting sustainable transport choices); **T5** (street network); **T6** (facilitating local connectivity); **T7** (transport assessments and travel plans); **T8** (parking); **T9** (planning for pedestrians and cyclists); and **T10** (using waterways for transport), justified, effective and consistent with national policy and the relevant policies in the London Plan? In particular:

(i) Can these policies cope with the estimated impacts of pedestrian and transport impacts which will be generated by **large events**, for example in relation to the capacity at Stratford Station?

This is addressed in the [Transport Capacity Explanatory Note \(LD34\)](#) attached to this document as Annex 2.

(ii) Should there be a presumption in favour of **car-free developments** in areas with a high PTAL, in line with the Draft London Plan?

(iii) Should the Plan set **modal shift targets** to promote sustainable transport?

(iv) Are **parking and access** issues in the centres properly addressed in the Plan?

LLDC response: The [Transport Capacity Explanatory Note \(LD34\)](#) attached in Annex 2 to this response sets out the approach to the pedestrian and transport impact generated by large events in relation to capacity. The changes made to policies within section 7 (Securing transport infrastructure to support growth) reflect the updated context and evidence set out in [Transport Study \(2018\) \(LEB13\)](#), [Infrastructure Delivery Plan \(2018\) \(TBP4\)](#) and [Transport Background Paper \(2018\) \(TBP5\)](#). These policies continue to be consistent with national policy, specifically section 9 of *the Framework*, and all policies within section 7 (Securing transport infrastructure to support growth) have been updated to reflect updated targets around modal change and healthy streets as set out in the DLP.

Existing Legacy Corporation policy T.8 encourages car-free development in areas with a high PTAL, this is further enhanced in policy T.8 in the Draft Revised Local Plan, which states that the development should 'aim as a starting point for car-free development' reflecting the DLP's reduced parking targets. Legacy Corporation policy is in conformity with policy contained within the DLP in relation to parking and access. Development within the Legacy Corporation area that is currently coming forward or has recently been delivered is testament to existing Legacy Corporation policy with a large percentage of development being delivered already being car free, in 2017 70% of permissions granted across the Legacy Corporation were car free and this rose to 100% in 2018 ([AMR 2018 \(LEB17\)](#)).

The Legacy Corporation as a Mayoral Development Corporation (MDC) is the Local Planning Authority for its area, as a MDC the Legacy Corporation does not have the same requirements or responsibilities as a London Borough or other Local Authority. Whilst London Boroughs may have requirements around modal shift, these same requirements are not applicable to the Legacy Corporation. However, the Legacy Corporation has and continues to put in place policy, such as the updated policy T.9, to prioritise active travel and public transport usage over other less sustainable transport choices that either reflects or goes above the requirements set out in the DLP. The Legacy Corporation is committed through updated policies and wording, including T.9, in the Draft Revised Local Plan to supporting the DLP London wide target of 80% of all journeys in London being made on public transport or through active travel by 2041.

As part of the work relating to the [Infrastructure Delivery Plan \(2018\) \(TBP4\)](#) supported by the [Transport Study \(2018\) \(LEB13\)](#) parking and access issues have been looked into this has fed into changes to the plan, which means that the plan does properly address parking and access issues in the current context.

Matter 8: Section 8 – Creating a Sustainable Place to Live and Work

- 8.1 Health and Wellbeing:** Is **Objective 5** (delivering a smart, sustainable and healthy place to live and work) and **policy S1** (health and wellbeing) policy justified, effective and consistent with national policy and the relevant policies in the London Plan?

LLDC response: Objective 5 (Deliver a smart, sustainable and health place to live and work) continues to be justified, effective and consistent with national and DLP policy, the addition of 'Smart' to the objective title and been to reflect the advances in technologies and thinking around urban management which have taken place since the adoption of the Legacy Corporation Local Plan in 2015. This also reflects the inclusion of a future technologies policy focused on increasing digital connectivity, safeguarding existing technology infrastructure and enabling future technology with policy S.6 (Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure). This widened emphasis of Objective 5 (Deliver a smart, sustainable and health place to live and work) combined with policy S.6 (Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure) are aimed at supporting innovation and infrastructure which supports development in the Legacy Corporation area as well as future proofing the Plan.

Policy S.1 (Health and wellbeing) builds on the policy on the existing Legacy Corporation Local Plan to include changes in national and DLP policy, including reference to the recently adopted healthy streets approach, and is therefore consistent with national and DLP policy.

- 8.2 Energy:** Are **policies S2** and **S3** (Energy in new development and energy infrastructure and heat networks) justified, effective and consistent with national policy and the relevant policies in the London Plan??

LLDC response: Policies S.2 (Energy in new development) and S.3 (Energy infrastructure and heat networks) reflect the policies in the [Adopted Local Plan \(LD1\)](#) and continue to be consistent with national and Draft New London Plan policy, where changes have been made to update policy S.2 (Energy in new development) this has been to incorporate changes in national and DLP policy, such as with the inclusion of the DLP requirement for a minimum on-site reduction of carbon emissions of at least 35 per cent beyond the Building Regulations 2013.

- 8.3 Sustainable design:** Is **policy S4** (sustainable design and construction) justified, effective and consistent with national policy and the relevant policies in the London Plan?

LLDC response: Policy S.4 (Sustainable design and construction) reflects the policy in the [Adopted Local Plan \(LD1\)](#). The Legacy Corporation, through the process of reviewing current policies, have found that this policy continues to be in line with national and DLP policy and therefore no revisions are required.

8.4 Water supply and waste water disposal: Is **policy S5** (water supply and waste water disposal) justified and realistic, for example in relation to:

(i) whether the policy is effective enough to meet the concerns of providers such as Thames Water, to require developers to demonstrate that adequate water supply and waste water infrastructure capacity exists both on and off site to serve the proposed development and not adversely affect other users? Should this approach be extended to retrofitting of existing buildings?

LLDC response: Policy S.5 (Water supply and waste water disposal) is in line with national and DLP around water supply and waste water disposal. This policy is effective enough to require developers to demonstrate that adequate water supply and waste water infrastructure exists, and to therefore have adequate consultation with utility providers in this case Thames Water. As part of the Regulation 19 consultation the Legacy Corporation did not receive a response from Thames Water, so it is therefore assumed that Thames Water do not have any changes to make or objections with the provisions set out in this policy. This policy makes provision for the option for retrofitting, with all planning decisions being required to consider measures as part of the first paragraph of the policy.

(ii) whether the Plan effectively meets its Thames River Basin Management Plan targets?

LLDC response: The [Adopted Local Plan \(LD1\)](#) effectively contributes to the targets around the [Thames River Basin Management Plan \(OS2\)](#) through requirements around sustainable drainage and water management in the Legacy Corporation area. As part of the Regulation 18 consultation both the Environment Agency and Thames Water were supportive of policy BN.2 (Creating distinctive waterway environments) and its effectiveness.

8.5 Digital connectivity: Is **policy S6** (increasing digital connectivity) justified, effective and consistent with national policy and the relevant policies in the London Plan?

LLDC response: Policy S.6 (Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure)

builds upon policy IN.1 in the Adopted Local Plan, expanding the scope of the policy to include the DLP's requirements around the inclusion of space for ducting in new development. This policy continues to build upon this ducting requirement to enable and support the integration of other potential future technological innovations in the Legacy Corporation area, exceeding national and DLP policy requirements to futureproof the Plan and ensure technological innovation and advancement is allowed for in policy.

8.6 Waste: Are **policies S7** and **S8** (planning for waste management and waste reduction) justified, effective and consistent with national policy and the relevant policies in the London Plan? How do the policies relate to the policies and practices of the four constituent Boroughs?

LLDC response: Policies S.7 (Planning for waste) and S.8 (Waste reduction) are in line with national and DLP policy. These policies are reflective of policies IN.2 and S.6 in the [Adopted Local Plan \(LD1\)](#), and have been moved to sit next to each other in the submitted Plan to improve legibility for those using these policies. The Legacy Corporation as a Mayoral Development Corporation and Local Planning Authority is the waste planning authority within the Legacy Corporation area, but not the waste authority. Therefore, the Legacy Corporation oversee planning applications in relation to waste sites, but do not have an apportionment target set out in the London Plan as the London Boroughs do, and therefore are not required to plan for the waste need within their area, but are required to work closely with the four boroughs to support them in meeting their apportionment targets.

The London Boroughs of Hackney and Waltham Forest are part of a group of north London boroughs which have come together to form a joint waste authority, the North London Waste Authority and are in the process of developing the North London Waste Plan. The Legacy Corporation have worked closely with these boroughs and have produced a Memorandum of Understanding relation to waste sites ([TBP8](#), Appendix 2) that they rely on within the Legacy Corporation area. The London Borough of Newham is part of the East London Waste Authority which has an adopted waste plan, this authority has no allocated waste sites within the Legacy Corporation area, however the Legacy Corporation continues to consult with this authority where appropriate. The Legacy Corporation have worked closely with the London Borough of Tower Hamlets in relation to waste sites and areas of search within the Legacy Corporation area, and have produced a Memorandum of Understanding that reflects this ([TBP8](#), Appendix 3). The strategic and borough waste plans and related policies are referenced within the supporting text for policies S.7 (Planning for waste) and S.8 (Waste reduction).

8.7 Urban greening: Is **policy S9** (overheating and urban greening) justified, effective and consistent with national policy and the relevant policies in the London Plan?

LLDC response: Policy S.9 (Overheating and urban greening) reflects current policy in the Adopted Local Plan and has been updated to ensure that they are in line with national and DLP policy, including the inclusion of the Mayor of London's 2050 zero carbon target.

8.8 Flood risk: Are **policies S10** and **S11** (flood risk and sustainable drainage) justified, effective and consistent with national policy and the relevant policies in the London Plan?

LLDC response: Policies S.10 (Flood risk) and S.11 (Sustainable drainage measures and flood protections) are justified, effective and consistent with national policy and relevant policies in the London Plan. These two policies reflect the existing Policy S.8: Flood risk and sustainable drainage measures included within the [Adopted Local Plan \(LD1\)](#), which has been updated in line with latest information and national and DLP policies and separated into two policies to ensure further clarity for those using these policies. The Environment Agency Regulation 19 stage consultation response expressly welcomed the revised approach to these policies and the areas of concern raised by the Environment Agency, as set out in their consultation representation ([LD11](#)), have specifically been addressed through the introduction of proposed minor modifications **MM36** and **MM37** within the [Schedule of Proposed Post-Publication Modifications \(2019\) \(LD20\)](#). In addition a [Flood Risk Study \(LEB8\)](#) (including an update that specifically addresses issues raised in respect of methodology and flood modelling data in a manner that has been agreed with the Environment Agency ([LEB8](#) and [LEB8A](#))) has been prepared that draws on the most up-to-date borough Strategic Flood Risk Assessments and associated flood modelling data and is consistent with the draft policies prepared. This includes flood risk sequential and exceptions testing for site allocations in the Legacy Corporation area.

8.9 Resilience: Is **policy S12** (resilience, safety and security) justified and effective? Does it align with the expectations of Section 14 of *the Framework*, which sets out the parameters of planning for **climate change**? Is it consistent with the relevant policies in the London Plan?

LLDC response: Policy S.12 (Resilience, safety and security) is a new policy which reflects national and DLP policy, as well as acknowledging the unique setting of the Legacy Corporation area which has a high profile following the legacy of the 2012 London Olympic Games and therefore aims to be exemplary. The policies throughout the Plan reflect Section 14 of *the Framework*, with the built and natural environment and sustainability policies including measures which aim to mitigate the impact

of development on climate change as well as managing the effects of climate change through measures such as sustainable design. The policies and principles included within Section 14 of *the Framework* are embedded throughout the Plan, through its vision, objectives and the specific policies and site allocations it achieves a comprehensively sustainable outcome, including climate change factors but with the specific matters within Section 14 of the Framework covered within Section 6 of the Plan. The [IIA \(LD8\)](#) has specifically considered climate change and the assessment framework includes, at topic 15 and 16, climate change adaptation and mitigation, along with associated objectives, the draft policy is in accordance with this assessment.

Matter 9 – The Local Plan Sub Areas**9.1 Is the Local Plan approach to Sub Areas appropriate for the LLDC area, and are the four Sub Areas appropriately defined?**

LLDC response: The approach to the sub areas was developed and defined through the process of developing the currently adopted Local Plan using geographical and major infrastructure features, mainly the River Lee, the Greenway and the northern edge of the metropolitan centre at Stratford. to define these sub areas. This is considered to provide a logical approach through grouping of character areas that allows the LLDC area as a whole to be understood in greater detail and the approach to growth focused through more specific strategies. The review of the Local Plan has updated the detail, for example through updates to some site allocations or deletions where development has come forward, but no views have been expressed during the revision process, with its associated consultations and engagement, that suggests that this approach would require amendment.

Matter 10: Sub Area 1 - Hackney Wick and Fish Island:

10.1 Do **policies 1.2** (managing change); **1.2** (identity and appearance); **1.3** (connectivity); **1.4** (public and private realm), together with **Site Allocations SA1.1** (Hackney Wick Station Area); **SA1.2** (Hamlet Industrial Estate); **SA1.3** (Hepscott Road); **SA1.4** (Neptune Wharf); **SA1.5** (East Wick and Here East); **SA1.6** (Sweetwater); and **SA1.7** (Bartrip Street South), justified, effective and consistent with national policy and the relevant policies in the London Plan, especially in relation to:

(i) Meeting the overall needs of the LLDC area;

LLDC response: The policies and site allocations within Sub Area 1 section have been reviewed and where necessary updated to ensure that they remain relevant and up-to-date in accordance with national policy and the Draft New London Plan, for example removing site allocations where comprehensive development has or is taking place. The insertion of minimum housing numbers and levels of expected affordable housing into the site allocations will help to ensure that development that takes place meets the identified housing need and capacity within Hackney Wick and Fish Island, while Policy 1.2 (Promoting Hackney Wick and Fish Island's unique identity) will continue to reinforce Policies B.1 (Location and maintenance of employment uses), B.2 (Thriving town, neighbourhood and local centres) and B.4 (Providing low-cost business space, affordable and managed workspace) in planning for sufficient industrial land and employment floorspace, along with low-cost and affordable workspace, along with floorspace for retail, community and service uses within the Neighbourhood Centre. This has helped to ensure that the Plan continues to meet the overall needs of the LLDC area based on the updated evidence utilised in reviewing the Plan.

(ii) Environmental/heritage impact;

LLDC Response: The vision for the sub area along with the identified 'Area Priorities' (pages 173-175 in the Plan, [LD5](#)) outline the emphasis on heritage led regeneration and the importance utilising, protecting and improving the spaces and waterways within this area, with the Hackney Wick Conservation Area and Fish Island and White Post Lane Conservation Area identified along with Designated and Non-designated Heritage Assets within Plan reinforcing this context.

(iii) Impact on the living conditions of existing and/or future residents/occupiers;

LLDC response: it is considered that the policies in this sub area section of the Draft Revised Local Plan, the requirements set out in the individual

site allocations and the wider Built and Natural Environment (BN) policies (including policies BN.4, BN.5 and BN.6 addressing design standards and quality and BN.8, BN.9, BN10, BN.11 and BN.12, addressing matters of open space, playspace, views, air quality and noise) in the Plan work effectively together to provide a comprehensive range of planning tools against which to develop acceptable development proposals and for effective development management decisions to be made. Policy BN.12 (Noise) for example introduces the Agent of Change Principle to protect existing occupiers and users.

(iv) Safe and acceptable vehicular access and parking considerations;

LLDC response: Policies T.8 (Parking and parking Standards in new development) and T.9 (Providing for pedestrians and cyclists) set the approach to managing parking and vehicle access, while also setting out the approach that should be taken for providing for pedestrians and cyclists, with specific standards being those identified in the DLP and in accordance with national policy. Figure 31 Sub Area 1 key connections, shows where enhancement of routes is required and the updated [Infrastructure Delivery Plan \(TBP4\)](#) contains the relevant identified projects related to these improvements. Site allocations also include specific reference to specific improvements/enhancements or projects where these are related to the site. For Hackney Wick and Fish Island, a key project is the delivery of a new north-south pedestrian and cycle route to open up and improve access and this route identified with site allocations (SA1.1 (Hackney Wick Station Area), SA1.3 (Hepscott Road), SA1.4 (Neptune Wharf)) and reinforced specifically in Policy 1.3 (2) (Connecting Hackney Wick and Fish Island).

(v) Whether there are willing land owner(s) for all the land concerned;

- **LLDC response:** Annex 1 to this response (Housing Delivery Information by Financial Year ([\[LD33\]](#)) provides a detailed picture of where site allocations either have an extant planning permission, with significant evidence of development activity. The [2018 Annual Monitoring Report \(LEB17\)](#) provides a wider picture of development and delivery for each sub area (pages 10-18). Some individual sites within site allocation SA1.1 (Hackney Wick Station Area) and all of the land within SA1.5 (East Wick and Here East) and SA1.6 (Sweetwater) are within the control of the LLDC, with permissions in place and either development under way or being actively pursued.

(vi) Flood risk;

LLDC response: A [Flood Risk Study \(LEB8\)](#) (including an update - LEB8A) has been prepared that draws on what is now the most update borough Strategic Flood Risk Assessments and related data. This includes

flood risk sequential and exceptions testing for site allocations where this is necessary (see question 8.8 above).

(vii) sustainability, including access to convenient and reliable public transport (high PTAL rating), access to shops, schools, health care provision, equipped and informal play/recreation space, and other community facilities; and

LLDC response: PTAL levels currently peak at PTAL 4 around Hackney Wick Station and fall away to PTAL 2 in the south of Fish Island but are forecast to increase by 2031. The combination of design policies within the Draft Revised Local Plan, the site allocations and the wider strategy for Hackney Wick and Fish Island seek to balance the quantum and type of growth with accessibility levels and the relationship to its identified character and heritage. The strategy, site allocations and policies also focus on the development of the Neighbourhood Centre as a focus for retail and services linked to the location of the station and local bus services. Current and planned infrastructure delivery also focuses on the delivery of localised improvements to walking and cycling to ensure that this becomes a sustainable neighbourhood. Site allocations have included requirements for delivery of community, medical and education facilities where a need has been identified in the Infrastructure Delivery Plan (TBP4), summarised in **Figure 11 Community Facilities** (page 77 in the Plan – Document LD5). Site allocations also identify where new public open space is required and the [Open Space and Playspace Assessment \(LEB7\)](#) has assessed the provision of space comprehensively. Schools provision has been assessed in [Schools Place Review \(LEB9\)](#). Schools have been delivered at East Wick and at Sweetwater since adoption of the Local Plan in 2015 and there remains a site allocation requirement for a primary school at Neptune Wharf (site allocation SA1.4). This approach is consistent with the wider infrastructure assessments and strategy set out in the Plan and considered to be consistent with the DLP and national planning policies.

(viii) Any other relevant infrastructure, planning, marketing or viability constraints?

LLDC Response: The LLDC does not consider that there are other constraints that have been identified through the Local Plan review process and the related evidence review that has been undertaken as part of this. The viability aspects of this have been tested and reported within [Local Plan Viability Study \(LD12\)](#). A [Sites Report \(TBP6\)](#) details how sites have been reviewed and selected, including the relevant engagement through a Call for Sites process.

Matter 11: Sub Area 2 - North Stratford and Eton Manor:

11.1 Do **policies 2.1** (housing typologies); **2.2** (Leyton Road – improving public realm); and **2.3** (local centre and non-residential uses), together with **Site Allocations SA2.1** (Chobham Farm); **SA2.2** (East Village); **SA 2.3** (Chobham Manor); and **SA2.4** (Chobham Farm North), justified, effective and consistent with national policy and the relevant policies in the London Plan, especially in relation to:

(i) Meeting the overall needs of the LLDC area;

LLDC response: The policies and site allocations within Sub Area 2 section have been reviewed and where necessary updated to reflect the local changes and ensure that they remain relevant and up-to-date with national policies and the DLP. For example, site allocations have been updated to reflect developments that have now taken place and provide more detailed guidance for the remaining development sites. The insertion of minimum housing numbers and levels of expected affordable housing into the site allocations will help to ensure that development that takes place meets the identified housing need and capacity within Sub Area 2. Policy 2.1 (Housing Typologies) and the identified 'Area Priorities', reinforced by policies H.1 (Providing for and diversifying the housing mix) and H.2 (Affordable housing), will continue to deliver the appropriate housing type, size and tenure mix, as supported by the most recent evidence study [Housing Requirement Study \(LEB2\)](#). Policy 2.3 (Local centre and non-residential uses) has been updated to ensure the creation of a viable Local Centre. A new site allocation is proposed as a result of the Call for Site process (SA2.4 Chobham Farm North) in order to continue to meet the strategic housing need. These policies, supported by the other Local Plan policies, will help to ensure that the overall needs of the LLDC area are met.

(ii) Environmental/heritage impact;

LLDC response: Considerable progress is already being made towards achieving the vision for Sub Area 2. The Sub Area consists of a significant amount of open space (60 per cent) designated as MOL or LOS. Where appropriate, site allocations require new open and play spaces to be delivered. Monitoring information shows that developments have continued the provision of new high-quality open spaces and high development quality and achieve sustainability standards, providing a robust green infrastructure network and creating a sustainable environment and desirable place to live and work. New developments will continue to address the area's main priorities and contribute towards the delivery of high development quality and sustainability standards and protect and deliver high quality new public spaces on the remaining sites. The Sub Area does not contain conservation areas or Designated and Non-

Designated Heritage Assets. The Sub Area 2 policies are therefore in line with the national and DLP policies in relation to environment/heritage impacts.

(iii) Impact on the living conditions of existing and/or future residents/occupiers;

LLDC response: The delivery of high quality development and high sustainability standards, new open space and improved public realm continue to be the main priority for this area. It is considered that the policies in this sub area such as Policy 2.2 (Leyton Road – improving public realm) will help to improve the existing environment along Leyton Road. Policy 2.3 (Local Centre and non-residential uses) and the guidance set out within the [draft Night-time Economy SPD \(LD22\)](#) will be key to ensuring minimal impact upon the living conditions of existing conditions of existing businesses and residents from town centre uses. These policies along with the requirements set out in the individual site allocations and the wider Built and Natural Environment (BN) policies in the Plan work effectively together to provide a comprehensive range of planning tools against which to develop acceptable development proposals and for effective development management decisions to be made. Policy BN.12 (Noise) for example introduces the Agent of Change Principle to protect existing occupiers and users, which the Night-time Economy SPD provides more detail on.

(iv) Safe and acceptable vehicular access and parking considerations;

LLDC response: Policies T.8 (Parking and parking Standards in new development) and T.9 (Providing for pedestrians and cyclists) set the approach to managing parking and vehicle access, while also setting out the approach that should be taken for providing for pedestrians and cyclists, with specific standards being those identified in the DLP and the national policy. Figure 34 Sub Area 2 key connections, page 204 ([LD5](#)), shows where enhancement of routes is required and the updated [Infrastructure Delivery Plan \(TBP4\)](#) contains the relevant identified projects related to these improvements. Site allocations also include reference to specific improvements/enhancements projects where these are related to the site. The remaining development parcels are situated in the areas that have high PTAL levels (5-6b) where proposals would be required to aim as a starting point for car-free development.

(v) Whether there are willing land owner(s) for all the land concerned;

LLDC response: All adopted sites within this sub area benefited from outline planning permission, around 85 per cent are already completed or currently under construction, and all remaining development plots have reserved matters planning application approvals. The [2018 AMR \(LEB17\)](#)

provides a wider picture of development and delivery for each sub area (pages 20-24). Discussions with the landowners have confirmed their willingness for delivering the remaining plots (please see Annex 1). A new site allocation (SA2.4 Chobham Farm North) has been proposed, and a detailed assessment of the site and the reason for its allocation is shown within the [Sites Report \(TBP6\)](#). Evidence of landowners and leaseholders discussion enhances confidence that the site as proposed for allocation is available for development.

(vi) Flood risk;

LLDC response: A [Flood Risk Study \(LEB8\)](#) (including an update [\[LEB8A\]](#)) has been prepared that draws on what is now the most update borough Strategic Flood Risk Assessments and related data. This includes flood risk sequential and exceptions testing for site allocations where this is necessary (see question 8.8 above).

(vii) sustainability, including access to convenient and reliable public transport (high PTAL rating), access to shops, schools, health care provision, equipped and informal play/recreation space, and other community facilities; and

LLDC response:

Around 85 per cent of the adopted sites in this sub area are complete or currently under construction, and around 3,000 new homes are already occupied. Recent developments included the provision of the new school Chobham Academy that accepted its first pupils in 2013 and a new health centre opened in 2014 with the capacity to serve the local and wider area. The Adopted Local Plan designates East Village as a local centre and sets policies (Policy 2.3 (Local centre and non-residential uses) (formerly 2.4) Policy B.2 (Thriving town, neighbourhood and local centres)) that prescribe its function and ensure the creation of a viable Local Centre. Monitoring information has shown that this centre has developed as a fully functioning local centre and the [Retail and Town Centre Needs Study \(LEB6\)](#) has confirmed that it is fulfilling its function to serve a localised catchment and complement other larger scale retail uses that can be found in the proximity. Policy 2.3 (Local Centre and non-residential uses) has been updated to designate the whole retail frontage within the centre boundary as primary frontage. The centre boundary has also been amended to include newly established units as well as take account of retail units currently under construction. This Sub Area consists of a significant amount of open and play spaces and also benefits from access to a number of leisure and sports centres and community facilities such as Lee Valley Hockey and Tennis Centre and the Velopark. The area is well served by public transport, consequently, most of the area has high PTAL levels (5-6b) and only a small part to the north falls away to PTAL 2-4. It

is considered that the policies in this sub area section of the Draft Revised Local Plan, the requirements set out in the individual site allocations and the wider Revised Local Plan, in relation to sustainability, public transport, access to shops and social infrastructure, open space and other community facilities, are in line with the national and LDP policies.

(viii) Any other relevant infrastructure, planning, marketing or viability constraints?

LLDC response: The LLDC does not consider that there are other constraints that have been identified through the Local Plan review process and the related evidence review that has been undertaken as part of this. The viability aspects of this have been tested and reported within [Local Plan Viability Study \(LD12\)](#). A [Sites Report \(TBP6\)](#) details how sites have been reviewed and selected, including the relevant engagement through a Call for Sites process.

Matter 12: Sub Area 3 – Central Stratford and Southern Queen Elizabeth Olympic Park:

12.1 Do **policies 3.1** (Metropolitan Centre); **3.2** (Stratford High Street Policy Area) and **3.2A** (improving connections around central Stratford), together with **Site Allocations SA3.1** (Stratford Town Centre West); **SA3.2** (Stratford Waterfront North); **SA3.3** (Stratford Waterfront South); **SA3.4** (Greater Carpenters District); **SA 3.5** (Bridgewater Road); and **SA 3.6** (Rick Roberts Way), justified, effective and consistent with national policy and the relevant policies in the London Plan, especially in relation to:

(i) Meeting the overall needs of the LLDC area;

LLDC response: The policies and site allocations within Sub Area 3 section have been reviewed and where necessary updated to ensure that they remain relevant and up-to-date with national policy and the DLP. The insertion of minimum housing numbers and levels of expected affordable housing into the site allocations will help to ensure that development that takes place meets the identified housing need and capacity within the sub area.

SA3.1 (Stratford Town Centre West) and Policy 3.1 (Metropolitan Centre) provide a location for the expansion in office floorspace as well as a significant proportion of the retail requirements for the area. SA3.2 (Stratford Waterfront North) and SA3.3 (Stratford Waterfront South) sites relate to East Bank proposals which facilitate important cultural and educational expansion, contributing to the aims of the Vision for the sub area as set out on page 212 of the illustrative Plan ([LD5](#)). These site allocations, alongside SA3.4 (Greater Carpenters District), SA3.5 (Bridgewater Road) and SA3.6 (Rick Roberts Way), provide a major contribution to the overall housing target as set out within SP.2 (Maximising housing and infrastructure provision within new neighbourhoods), in total providing over 8,000 homes over the plan period to 2036. The policies within this section also provide for other identified needs, such as schools and infrastructure.

(ii) Environmental/heritage impact;

LLDC Response: The vision for the sub area along with the identified 'Area Priorities' (paragraphs 12.3 and 12.4, page 214 ([LD5](#))) outline the emphasis of growth within the sub area. The sub area also consists of some existing communities, where Policy 3.2 (Stratford High Street Policy Area) and 3.3 (Improving connections around central Stratford) aim to ensure new development is well-integrated into the sub area, but also improves the current environment. In accordance with the approach within Policy B.2 (Thriving town, neighbourhood and local centres) (Table

4: Retail centre hierarchy) maximised reuse of heritage buildings and maintenance of community-based entertainment venues is supported. This approach is in accordance with Section 7, 8 and 16 of the NPPF and HC5 to 7 of the DLP.

(iii) Impact on the living conditions of existing and/or future residents/occupiers;

LLDC response: Given that a large part of the sub area is designated the Metropolitan Centre with potential for International Centre status Policy 3.1 (Metropolitan Centre) and the guidance as set out within the [draft Night-time Economy SPD \(LD22\)](#) will be key to ensuring minimal impact upon the living conditions of existing businesses and residents from this town centre expansion. These policies combined with the site allocations and Section 6 (Creating a High-Quality Built and Natural Environment) policies will work effectively together to provide a comprehensive range of planning tools against which to develop acceptable development proposals and for effective development management decisions to be made. Policy BN.12 (Noise) for example introduces the Agent of Change Principle to protect existing occupiers and users, which the Night-time Economy SPD provides more detail on.

(iv) Safe and acceptable vehicular access and parking considerations;

LLDC response: Policies T.8 (Parking and parking Standards in new development) and T.9 (Providing for pedestrians and cyclists) set the approach to managing parking and vehicle access, in accordance with Section 9 of the NPPF, while also setting out the approach that should be taken for providing for pedestrians and cyclists, with specific standards being those identified in the DLP. Policy 3.3 (Improving connections around central Stratford) and Figure 36 (Sub Area 3 key connections), identify appropriate route enhancements and specific projects that are required, and the updated [Infrastructure Delivery Plan \(TBP4\)](#) contains the relevant identified projects related to these improvements. Site allocations also include specific reference to specific improvements/enhancements projects where these are related to the site. For Sub Area 3, key projects include options for new entrances and capacity improvements to Stratford Regional Station (see SA3.4 (Greater Carpenters District) and T.1 (5) (Strategic transport improvements and infrastructure)); and bridges from SA3.1 (Development Parcel 4, Stratford Town Centre West) to SA3.2 (Stratford Waterfront North) and at Jupp Road (see SA3.4).

(v) Whether there are willing land owner(s) for all the land concerned;

LLDC response: As set out within the response to question 5.2, and Annex 1 to this response, the Legacy Corporation has carried out

additional, significant engagement with the key housing developers to confirm their delivery timetables. The Legacy Corporation has a direct role in the delivery of SA3.2 (Stratford Waterfront North), SA3.5 (Bridgewater Road) and SA3.6 (Rick Roberts Way) with permissions in place which are being actively pursued, and SA3.3 (Stratford Waterfront South) relates to the UCL East scheme which is now on site. The London Borough of Newham is a significant landowner for SA3.4 (Greater Carpenters District) and has long-held aspirations for the regeneration of the Greater Carpenters Estate, and frequent discussions take place between The Legacy Corporation, London Borough of Newham and including the Greater Carpenters Neighbourhood Forum. There are also a number of other smaller plots within the allocation where schemes have recently been completed, or significant pre-application discussions have taken place. The Sub Area 3 section of the [2018 AMR \(LEB17\)](#) also shows progress (as at January 2019) for all sites within the sub area.

(vi) Flood risk;

LLDC response: : A [Flood Risk Study \(LEB8\)](#) (including an update [\[LEB8A\]](#)) has been prepared that draws on what is now the most update borough Strategic Flood Risk Assessments and related data. This includes flood risk sequential and exceptions testing for site allocations where this is necessary (see question 8.8 above).

(vii) sustainability, including access to convenient and reliable public transport (high PTAL rating), access to shops, schools, health care provision, equipped and informal play/recreation space, and other community facilities; and

LLDC response: PTAL levels within the sub area are good, ranging from level 6b around Stratford Regional Station to a small PTAL 3 parcel to the south of the High Street. The combination of design policies, the site allocations and the wider Local Plan strategy have been influenced by these accessibility levels where large, high-profile uses, innovative forms of residential, and tall buildings are directed towards the Metropolitan Centre (see B.1 (Location and maintenance of employment uses), B.2 (Thriving town, neighbourhood and local centres), H.7 (Shared living accommodation), H.8 (Innovative housing models) and BN.5 (Proposals for tall buildings)). Current and planned infrastructure delivery also focuses on high-profile projects for the area (see Policy SP.4 (Planning for and securing transport infrastructure to support growth and convergence), T.1 (Strategic transport improvements)) as well as more localised connectivity projects as identified within Policy 3.3 (Improving connections around central Stratford).

Schools provision has been assessed in the [Schools Place Review \(LEB9\)](#). In relation to Sub Area 3, Site Allocation SA3.3 (Stratford Waterfront

South) includes education uses and a new school is proposed at SA3.6 (Rick Roberts Way). Site allocations identify where new public open space is required and the [Open Space and Playspace Assessment \(LEB7\)](#) has assessed the provision of space comprehensively. Site allocations also specifically reference the need to maintain/provide community facilities (see SA3.4 (Greater Carpenters District)) and new provision proposed where a need has been identified in the [Infrastructure Delivery Plan \(TBP4\)](#), summarised in Figure 11 Community Facilities (page 77 in the Plan [[LD5](#)]). These policies provide for identified needs and therefore are in accordance with Section 8 of the NPPF and S1 to 5 of the DLP.

(viii) Any other relevant infrastructure, planning, marketing or viability constraints?

LLDC Response: The LLDC does not consider that there are other constraints that have been identified through the Local Plan review process and the related evidence review that has been undertaken as part of this. The viability aspects of this have been tested and reported within [Local Plan Viability Study \(LD12\)](#). The [Sites Report \(TBP6\)](#) details how sites have been reviewed and selected, including the relevant engagement through a Call for Sites process.

Matter 13: Sub Area 4 – Bromley-By Bow, Pudding Mill, Sugar House and Mill Meads:

13.1 Do **policies 4.1** (a potential District Centre); **4.2** (bringing forward new connections to serve new development) and **4.3** (station improvements), together with Site Allocations **SA4.1** (Bromley-by-Bow); **SA4.2** (Sugar House Lane); **SA4.3** (Pudding Mill); **SA4.4** (Three Mills); and **SA 4.5** (Bow Goods Yard (Bow East and West)), justified, effective and consistent with national policy and the relevant policies in the London Plan, especially in relation to:

(i) Meeting the overall needs of the LLDC area;

LLDC response: The policies and site allocations within the Sub Area 4 section have been reviewed and where necessary updated to ensure that they remain relevant and up-to-date with national policies and the DLP, for example including additional site allocations, such as SA4.4 (Three Mills) and SA4.5 (Bow Goods Yard (Bow East and West)), where they are needed to support development in the area as well as guide development in safeguarded and protected land designations such as Strategic Industrial Locations (SIL) and conservation areas. The insertion of minimum housing numbers and levels of expected affordable housing into the site allocations will help to ensure that the development that takes place meets the identified housing need and capacity within this Sub Area, while Policies 4.1 (A potential District Centre), 4.2 (Bringing forward new connections to serve new development) and 4.3 (Station improvements) will continue to reinforce policies within section 4 (Developing business growth, jobs and lifelong learning) and section 7 (Securing transport infrastructure to support growth), developing a new district centre which includes an appropriate mixture of uses and ensuring that there is appropriate transport infrastructure to support development in the sub area.

(ii) Environmental/heritage impact;

LLDC Response: The vision for the sub area along with the identified 'Area Priorities' (pages 234-236 in the Plan ([LD5](#))) outline the emphasis on heritage led regeneration and the importance utilising, protecting and improving the historic waterways and heritage buildings within this area, with the Sugar House Lane and Three Mills Conservation Areas are identified along with Designated and Non-Designated Heritage Assets within the Plan further reinforcing this context. The policies relating to environmental and heritage within the Plan are in accordance with national policies and the DLP.

(iii) Impact on the living conditions of existing and/or future residents/occupiers;

LLDC response: As with the other Sub Areas identified within the plan it is considered that the policies in this sub area section of the Draft Revised Local Plan, the requirements set out in the individual site allocations and the wider Built and Natural Environment (BN) policies in the Draft Revised Local Plan work effectively together to provide a comprehensive range of planning tools against which to develop acceptable development proposals and for effective development management decisions to be made. Policy BN.12 (Noise) for example introduces the Agent of Change Principle to protect existing occupiers and users.

(iv) Safe and acceptable vehicular access and parking considerations;

LLDC response: As with all the Sub Areas and Site Allocations in the draft plan policies T.8 (Parking and parking Standards in new development) and T.9 (Providing for pedestrians and cyclists) set the approach to managing parking and vehicle access throughout the Legacy Corporation area, while also setting out the approach that should be taken for providing for pedestrians and cyclists, with specific standards being those identified in the DLP and is in accordance with national policy. Figure 38 Sub Area 4 key connections, shows where enhancement of routes is required and the updated [Infrastructure Delivery Plan \(TBP4\)](#) contains the relevant identified projects related to these improvements. Site allocations also include specific reference to specific improvements/enhancements as well as projects where these are related to the site. In Sub Area 4, key projects include improving the A12 junction at Bromley-by-Bow, increasing connectivity across the canal network with additional bridges in the Sugar House Lane area, and improvements to Bromley-by-Bow Station, this is further enforced by policy 4.3 (Station Improvements).

(v) Whether there are willing land owner(s) for all the land concerned;

- **LLDC response:** Annex 1 to this response (Housing Delivery Information by Financial Year) provides a detailed picture of where site allocations either have an extant planning permission, with significant evidence of development activity. The [2018 Annual Monitoring Report \(LEB17\)](#) provides a wider picture of development and delivery for each sub area including Sub Area 4 (pages 31-35). Some individual sites within site allocation SA4.1 (Bromley-by-Bow), SA4.3 (Pudding Mill) and SA4.4 (Three Mills) are partially or entirely within the control of the LLDC, with permissions in place and development being actively pursued or initial plans for sites being developed. The [Bromley-by-Bow SPD \(LD24\)](#) was developed through working with land owners in this area and further evidence with regards to housing delivery and sites specific information can be found within the [Housing Delivery Explanatory Note \(LD27\)](#).

(vi) Flood risk;

LLDC response: As set out in other sub areas, a [Flood Risk Study \(LEB8\)](#) (including an update [\[LEB8A\]](#)) has been prepared that draws on the most update borough Strategic Flood Risk Assessments and related data. This includes flood risk sequential and exceptions testing for site allocations where this is necessary. The Flood Risk Study confirms that the policies are appropriate and comply with national and DLP policy.

(vii) sustainability, including access to convenient and reliable public transport (high PTAL rating), access to shops, schools, health care provision, equipped and informal play/recreation space, and other community facilities; and

LLDC response: There is a wide variation of PTAL levels currently in this sub area, peaking at PTAL 6a around the west of Stratford High Street and dropping to PTAL 0 around Three Mills. It is expected that these levels will change over the plan period where a range of infrastructure projects and local connectivity enhancements are identified to take place or be delivered and therefore connectivity improves in an area, however it is not possible to predict levels of change in future PTAL ratings. The combination of design policies within the Draft Revised Local Plan, the site allocations and the wider strategy for Sub Area 4, including the more detailed guidance provided within the SPDs for [Bromley-by-Bow \(LD24\)](#) and [Pudding Mill \(LD23\)](#) aim to balance accessibility levels and the type and amount of growth. The site allocations and other policies focused on this area, including the creation of new local centres set out parameters around retail and services linked to the locations of stations and local bus services. Current and planned infrastructure delivery throughout the Legacy Corporation area also focuses on the delivery of localised improvements to walking and cycling to support the Healthy Streets approach and modal shift. Site allocations have included requirements for delivery of community, medical and education facilities where a need has been identified in the [Infrastructure Delivery Plan \(TBP4\)](#), summarised in **Figure 11 Community Facilities** (page 77 in the Plan). Site allocations also identify where new public open space is required and the [Open Space and Playspace Assessment \(LEB7\)](#) has assessed the provision of space comprehensively. Schools provision has been assessed in the [Schools Place Review \(LEB9\)](#). Schools are planned to be delivered at Bromley-by-Bow and Sugar House Lane. The policies in relation to sustainability are in line with national and DLP policy.

(viii) Any other relevant infrastructure, planning, marketing or viability constraints?

LLDC Response: As with other sub areas the LLDC does not consider that there are other constraints that have been identified through the Local Plan review process and the related evidence review that has been

undertaken as part of this. The viability aspects of this have been tested and reported within [Local Plan Viability Study \(LD12\)](#). A [Sites Report \(TBP6\)](#) details how sites have been reviewed and selected, including the relevant engagement through a Call for Sites process.

Matter 14 – Delivery and Implementation

14.1 Community Infrastructure:

(i) Is the Plan sufficiently comprehensive in its coverage of all key aspects of community infrastructure and services, and does it establish a **robust basis for implementation**?

(ii) Is the Plan sufficiently **flexible** and consistent with national policy to set a framework for achieving the delivery of facilities and services to the community, as expressed in section 8 of *the Framework*?

(iii) Should the Plan include **clear development allocations** for schools and key community health facilities?

LLDC response:

Section 11 of the Plan sets out the approach to the delivery of the Plan's strategy and its policies overall. This includes Table 14 'Infrastructure Delivery Policies' that clearly sets out which policies and site allocations within the Plan relate to the delivery of key infrastructure and breaks this down for each infrastructure category and type. This helps to identify the policies and site allocations that, for example, relate to delivery of social infrastructure and their related services. The [Infrastructure Delivery Plan \(TBP4\)](#) and related evidence have provided a basis for determining the levels of need for infrastructure and proposed and required provision of infrastructure to support these specific inclusions within the Plan. Section 11 of the Plan also sets out the approach that will be taken to securing delivery of infrastructure and how S106 Agreements and the Community Infrastructure Levy will be utilised alongside working with key partners in order to secure funding and delivery. A [Planning Obligations SPD \(LEB20\)](#) has been adopted which provides additional guidance on this approach.

Policy CI.1 'Providing New and retaining existing community infrastructure' sets how existing community infrastructure will be protected alongside provision of the new, while also providing flexibility around how specific proposals seek to meet community infrastructure needs. It also encourages sharing of space and the utilisation of school facilities in meeting this need in a flexible and effective way. Figure 11 Community Facilities provides a mapped picture of current and proposed community facilities within the LLDC area that reflects the evidenced requirements set out in the Plan's site allocations. Site allocation SA1.3 Sweetwater, for example, includes requirement for a health centre, nursery and library.

For schools provision the Plan actively promotes the widening of choice in accordance with Paragraph 94 of the Framework. Policy CI.2 'Planning for and bringing forward new schools' is supported by Table 5 'Existing

schools provision' and Table 6 'Planned schools provision' which together set out the identified new schools that will be required within the Plan period and the site allocations within the Plan that include a requirement for their provision. The evidence underlying this is set out in the [Schools and School Place Review \(LEB9\)](#) and supported by document [Schools Explanatory Note \(LD28\)](#).

14.2 Development Management: Does the Plan provide sufficient guidance to cover aspects for new development, such as high design quality and impact on living conditions for future occupiers and neighbouring residents?

LLDC response: The Plan includes clear development management policies on design of new development (primarily Policy BN.4 Designing Development, BN.5 Proposals for tall buildings, BN.6 Requiring Inclusive Design). These are complemented by the suite of other policies that address environmental quality and pollution, health and wellbeing, energy and water provision and use. Site allocations include specific guidance on the matters that need to be addressed to achieve high quality development within the Supporting Development Principles.

14.3 Risk: Overall, does the Plan take sufficient account of uncertainties and risks?

LLDC response: The Local Plan is based on a comprehensive assessment of the circumstances and development capacity of the Legacy Corporation area. This has resulted in the identification of all land with the potential for delivering development within the lifetime of the Plan. In terms of housing delivery, it is possible to demonstrate a five year supply of land with a buffer. More detail on housing delivery is available in relation to the responses included for Matter 5. Monitoring arrangements are set out in Section 14 of the Plan and paragraph 14.20 confirms that in the event monitoring identifies that key strategic elements of the Plan would not be met to a significant or on-going extent then an early review of the Plan would be undertaken. In terms of viability, [Local Plan Viability Study \(LD12\)](#) is clear about uncertainties and risks and how these have been factored into the assessment.

14.4 Monitoring: How effective will the monitoring arrangements be?

LLDC response: Table 15 in the Plan, Local Plan Key Performance Indicators (KPIs), sets out the monitoring scheme for the Plan. Annual authority monitoring reports ([LEB14](#), [LEB15](#), [LEB16](#), [LEB17](#)) have been produced reporting on these KPIs and wider planning and development delivery since adoption of the Local Plan in 2015 and demonstrate an

effective approach to monitoring arrangements, with data derived from this being fed into the review of the Local Plan. The KPIs and monitoring criteria set out in Table 15 have been reviewed and in some cases updated from the version in the adopted Local Plan. Annual monitoring of the Plan will continue against the updated KPIs and monitoring criteria.

The annual authority monitoring reports will be considered alongside the new Housing Delivery Test information to be published by the Secretary of State each year and any action plans required pursuant to paragraph 75 of the NPPF. As noted above, in the event that monitoring identifies that key strategic elements of the Plan would not be met to a significant or on-going extent then an early review of the Plan would be undertaken.

Annex 1- Housing Delivery Information by Financial year (LD33)

LLS1

Part A (i)- Confirmatory evidence on housing delivery from key developers

This information is a summary of various correspondence between the LLDC and developers. This is available on the request of the Inspector.

Site Allocation	Scheme	Principal Developer	Status	Information Received
SA1.4 Neptune Wharf	Fish Island Village	Peabody	Outline permission and reserved matters for all residential elements. Block A and Phase 1 complete.	<p>LLDC sent a letter to the developer on 10th July; another email was also sent on 26th July.</p> <p>No response has been received.</p> <p>Information provided by the Case Officer confirms the following completion schedule:</p> <ul style="list-style-type: none"> • Block A and Phase 1 – 207 units completed in 2018/19 • Phase 1 and 2 - 217 units anticipated completion 202/21 • Phase 3 - up to 100 units anticipated completion 2021/22
SA1.5 East Wick and Here East	LCS PDZ5	LLDC	Outline permission and first phase of reserved matters. Phase 1 under consecution.	<p>In a letter of 10th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • Phase 1 – 302 units, anticipated completion 2020/21 • Phase 2 – 180 units, anticipated completion 2022/23 • Phase 3 – 154 units, anticipated completion 2024/25 • Phase 7 – 154 units, anticipated completion 2027/28
SA1.6 Sweetwater	LCS PDZ6	LLDC	Outline permission	<p>In a letter of 10th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • Phase 4 – 263 units, anticipated completion 2023/25 • Phase 5 – 206 units, anticipated completion 2026/27 • Phase 6 – 182 units, anticipated completion 2028/29

LLS1

SA2.1 Chobham Farm	New Garden Quarter	Telford Homes	Outline permission and reserved matters for Phase 4 phases. Phase 1 complete.	In a letter of 24 th July, the developer confirmed the following delivery schedule: <ul style="list-style-type: none"> • Zone 4 – 471 units anticipated completion 2019/20
SA2.1 Chobham Farm	Zone 2	Higgins Homes	Outline permission with all reserved matters. The site is under construction	LLDC sent a letter to the developer on the 23 rd July. No response to the letter has been received. A site visit has confirmed that the site is currently under construction due to be completed in 2020/21.
SA2.1 Chobham Farm	Zone 3	LCR Property	Outline permission	In a letter of 30 th July, the developer confirmed the following delivery schedule: <ul style="list-style-type: none"> • Zone 3 – 36 units anticipated completion 2021/22 • The developer has also confirmed that the reminding of this site, with a capacity to deliver around 202 units, is owned by other parties. It is expected that the reminding of this site will be delivered in the period between 2026-29.
SA2.2 East Village	East Village	Get Living London	Outline permission plus reserved matters for a majority of plots. Approximately 50% complete.	The developer has confirmed that around 946 units will be delivered between 2022-2024/24. The developer has requested that more detailed information is not shared publicly.

LLS1

SA2.3 Chobham Manor	LCS PDZ6	LLDC	Outline permission and reserved matters. Phase 1 complete.	<p>In a letter of 30th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • Phase 2 – 107 units complete in 2018/19; 100 units in 2019/20 • Phase 3 – 253 units anticipated completion 2021/22 • Phase 4 – 140 units anticipated completion 2021/22
SA3.2 Stratford Waterfront North	Stratford Waterfront	LLDC	Outline permission	<p>In a letter of 30th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • 600 units, anticipated completion 2029/30
SA3.3 Stratford Waterfront South	UCL East	UCL	Outline permission and some reserved matters.	<p>LLDC sent a letter to the developer on 10th July; another email was also sent on 26th July.</p> <p>No response has been received.</p> <p>Other evidence suggests that Phase 1, delivering around 515 student bedspaces, is expected to commence on site in January 2020. The remaining c.1300 bedspaces are expected to be delivered post-2030.</p>
SA3.6 Rick Roberts Way	LCS PDZ8	LLDC	Outline permission	<p>In a letter of 30th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • A minimum of approximately 400 units, anticipated completion 2030/31
	Gasholder site	St William	No scheme developed at present.	<p>In an email of 26th July, the developer confirmed the following delivery schedule:</p>

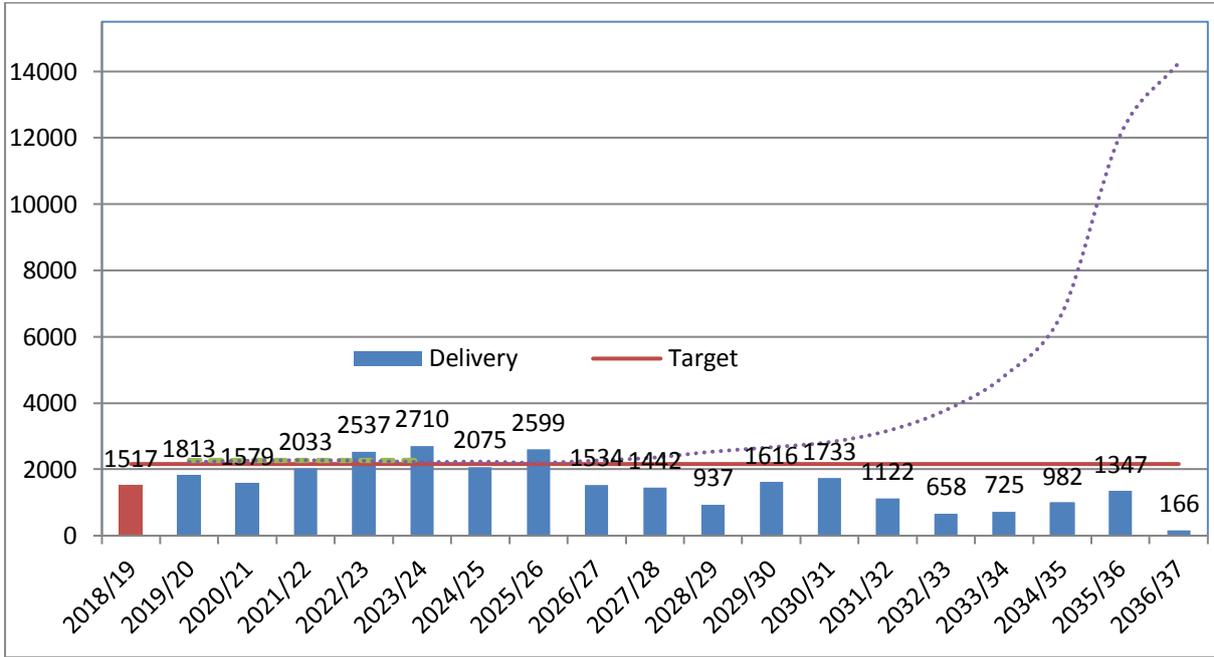
LLS1

				<ul style="list-style-type: none"> • A minimum of approximately 300 units, anticipated completion 2024/25
SA4.1 Bromley-by-Bow	Imperial 1 & 2	Guinness	Two full permissions.	<p>In a letter of 16th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • Imperial 2- 500 units anticipated completion 2023/23 • Imperial 1 – 407 units anticipate completion between 2022 and 2024.
SA4.2 Sugar House Lane	Sugar House Island	Vastint	Outline permission and reserved matters for a majority of plots.	<p>In his email of 23rd July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none"> • Plots NEQ, R1, R2- 380 units anticipated completion 2020 • Plots MU1, MU2, MU4- 65 units anticipated completion 2021-2022 • Plots MU3, MU5, R3, R4 - 308 units anticipated completion 2023-2024 • Plots R5, R6, R7, R8 - 387 units anticipated completion 2025-2027
SA4.3 Pudding Mill	Marshgate	Anthology	Full permissions (14/00422/FUL, 17/00669/VAR, 18/00493/FUL) for 349 units	<p>LLDC sent a letter to the developer on the 10th July; another email was also sent on 26th July.</p> <p>No response has been received.</p> <p>A site visit has confirmed that the site is currently under construction.</p>
	Cook's Road	Bellway Homes	Phase 1 complete. The remainder of the site has an approximate capacity of 460 units.	<p>LLDC sent a letter to the developer on the 10th July; another email was also sent on Friday 26th July.</p> <p>No response has been received. However pre-application discussions are progressing.</p>

LLS1

	LCS PDZ8	LLDC	Outline permission	<p>In a letter of 10th July, the developer confirmed the following delivery schedule:</p> <ul style="list-style-type: none">• Approximately 160 units, anticipated completion 2024/25• Approximately 1140 units, anticipated completion between 2026/27 and 2030/31
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Part A (ii) Updated housing trajectory



**Part B- Updated Appendix 2 to the Housing Background Paper (TBP2)-
Key Housing Locations**

Allocation/Application number	Pre-adoption phase		Adoption phase (financial year)		Total	
	2018/19 and 2019/20	2020/21-2024/25	2025/26-2029/30	2030/31-2034/35	2035/36	
SA1.2	0	0	0	108	0	108
SA1.3	0	475	0	0	0	475
SA1.7	0	0	0	0	0	0
SA2.4	0	0	200	0	0	200
SA3.4		0	1515	924	29	2468
SA3.5	0	0	0	0	252	252
SA3.6	0	0	0	0	503	503
SA4.1	0	840	287	520	106	1753
SA4.3	0	296	408	544	0	1248
SA4.4	0	0	31	73	0	104
	0	1611	2441	2061	890	7003
Permissions	2018/19 and 2019/20	2020/21-2024/25	2025/26-2029/30	2030/31-2034/35	2035/36	Total
LCS Sites ¹ (as amended by 17/00235/OUT and 18/00470/OUT)	207	1606	1835	304	0	3952
17/00235/OUT UCL East (1800 student bedrooms – counted on 1:2.5 basis ²)	0	171	0	549	0	720
18/00470/OUT Stratford Waterfront	0	0	300	300	0	600
Stratford City	481	1847	565	282	0	3175
Strand East	0	753	387	60	0	1200
Chobham Farm	471	344	202	0	0	1017
Neptune Wharf	207	317	0	0	0	524
16/00166/OUT Hackney Wick Masterplan (including	30	705	139	0	0	874

¹ Reflects permitted delivery within SA1.5, SA1.6 and SA2.3. Additional capacity for remaining LCS PDZs included within the relevant site allocation (ie SA3.5, SA3.6 and SA4.3).

² Student delivery now counted on a 1:2.5 ratio to reflect new proposed amendments to DLP policy H1.

15/00338/FUL, 14/00387/FUL, 15/00446/FUL)						
14/00374/FUL Monier Road West (Foundry)	120	0	0	0	0	120
33-35 Monier Road 15/00212/FUL	45	0	0	0	0	45
16/00560/FUL 1, Beachy Road	0	9	0	0	0	9
16/00441/FUL 25-37 Rothbury Road	0	23	0	0	0	23
15/00540/FUL 24-26 White Post Lane	0	103	0	0	0	103
17/00225/FUL 25	0	52	0	0	0	52
11/90619/FUMODA 68-70 High Street	0	173	0	0	0	173
17/00007/FUL Land adjacent (south) to 1-7 Dace Road	0	34	0	0	0	34
18/00095/FUL Iceland Wharf	0	120	0	0	0	120
15/00598/FUL Duncan House	44	0	0	0	0	44
16/00685/FUL 415 Wick Lane	0	175	0	0	0	175
15/00278/FUL Bream Street	0	202	0	0	0	202
14/00422/FUL, 17/00669/VAR, 18/00493/FUL Marshgate Lane	0	349	0	0	0	349
10/90285/FUMODA Manhattan Loft Gardens	248	0	0	0	0	248
15/00416/FUL 52-54 White Post Lane	55	0	0	0	0	55
16/00462/FUL 1-7 Dace Road	0	110	0	0	0	110
PA/11/02423/LBTH Bromley by Bow North Phase 2	112	0	0	0	0	112
16/00513/FUL 6 Brinkworth Rd	1	0	0	0	0	1
17/00058/FUL, 18/00057/NMA Units 123, 123a and 124 Omega Works	3	0	0	0	0	3
16/00470/FUL Unit 125, 125a And 126 Omega Works	5	0	0	0	0	5
15/00387/PNCOU Wingate House	0	23	0	0	0	23
13/00404/FUM (*REM amended) Alumno, 206-214 High Street	445	0	0	0	0	445
15/00598/FUL Duncan House student accommodation	511	0	0	0	0	511
14/00260/FUL 4 Roach Road, Fish Island, London, E3 2PA	44	0	0	0	0	44
13/00204/FUM Monier Road East	71	0	0	0	0	71

13/00322/FUL Land on the northern side of great Eastern Road	181	0	0	0	0	181
17/00230/FUL 180, High Street	7	0	0	0	0	7
17/00344/FUL BBB Lindhill	0	407	0	0	0	407
17/00364/FUL Danescroft	0	500	0	0	0	500
18/00084/FUL Flat 501 Omega Works	1	0	0	0	0	1
18/00101/DEM Rear of 59 Wallis Road	4	0	0	0	0	4
17/00430/FUL Lock Building	9	0	0	0	0	9
19/00009/PNCOU Site at Ground Floor, Central House	0	17	0	0	0	17
19/00040/PNCOU Unit 121 - 122, Omega Works, 4	0	4	0	0	0	4
17/00080/PNCOU Unit C2, 417, Wick Lane	3	0	0	0	0	3
18/00495/FUL Omega Works	1	0	0	0	0	1
18/00310/PNCOU	1	0	0	0	0	1
13/00232/FUL Wise Road	3	0	0	0	0	3
18/00385/FUL	3					3
16/00377/PNCOU Central House	17	0	0	0	0	17
	3330	8044	3428	1495	0	16297
Additional capacity	2018/19 and 2019/20	2020/21-2024/25	2025/26-2029/30	2030/31-2034/35	2035/36	2018/19 and 2019/20
Sub Area 1	0	399	868	381	197	1845
Sub Area 2	0	0	0	134	90	224
Sub Area 3	0	880	941	604	85	2510
Sub Area 4	0	0	50	145	5	200
TOTAL	0	1279	1859	1264	377	4779
ALL	3330	10934	7728	4820	1267	28079

Annex 2- Public Transport Capacity Note (July 2019) (LD34)