

Examination - London Legacy Development Corporation Local Plan 2015 to 2031

Inspector's Matters, Issues and Questions

Matter 7: Sub-Area Policies

Issue: *Whether the Local Plan provides for the 4 sub-areas and makes appropriate site allocations for new development in a manner consistent with integration with the Queen Elizabeth Olympic Park.*

Questions relevant to All Sub-Areas

1. Do the Local Plan's Vision and Objectives, and the visions, profiles and priorities for each Sub-Area justify all the site allocations?
2. Is there a case for enhancing the diagrams and illustrations in the Local Plan so that the location of the site allocations and their relationship to each other is clear to the reader? For example, Figure 31 is next to the Area profile for Sub-Area 2. The latter refers to Chobham Farm, Leyton Road, East Village, Victory Park, Stratford Town Centre, Queen Elizabeth Olympic Park, Lee Valley and Eton Manor. However, none of these is named on the diagram. Similarly, Policy 3.2 refers to Figure 34 when referencing a pedestrian bridge from Jupp Road, but this does not name the road.
3. Are all the site allocations sufficiently clear as to what development is sought, how much, and when it might be delivered?
4. Should Policies SA1.2-SA1.5, SA2.2-SA2.3, SA3.4, SA4.1 & SA4.3 give more detail as to the quantities of new homes and employment space which they are expected to provide, as well as the likely size and tenure of new homes, notably for the first 5 years of the plan?
5. Are there any gaps in key information about supporting infrastructure delivery? In particular, should individual site allocation policies include a reference to flood risk mitigation measures in line with the current SFRA, as sought by the Environment Agency? Are all the allocations feasible and viable for the proposed developments with proper assessment of flood risk and possible mitigation measures at the design stage?
6. Are some of the Site Allocation policies too long and is there some confusion as to what is policy and what is supporting text?
7. Is there any substantive evidence that the individual site allocations and proposed developments are:
 - Subject to constraints e.g. flood risk which might prevent delivery of the intended developments;
 - Potentially unviable; or
 - Likely to require a different timescale than those given in the Local Plan?

Questions relevant to Sub-Area 1, Hackney Wick and Fish Island

1. Are policies for this sub-section of the Local Plan consistent with the adopted Fish Island and Hackney Wick Area Action Plans, 2012?
2. Does Policy 1.1 Managing change in Hackney Wick and Fish Island have insufficient regard for market forces and give too much protection for existing, sometimes poor quality employment space?
3. Could the emphasis on cultural and creative industries frustrate other proposals for viable employment use? Is the weight given to low-cost and managed workspace too much?
4. Should employment proposals which would increase employment density if not floorspace be encouraged?
5. Should there be more flexibility in Policy 1.1, for example to allow some B1(a) use as part of mixed use developments?
6. Concerning Table 2 and the Employment Clusters of the Local Plan, should more flexibility be given to land outside these clusters, for example at Fish Island North to convert B2/B8 space into units for more modern business purposes?
7. Does the proposed amendment to Table 2 (no 6) distinguish the 2 railhead sites properly and set out the best way forward for Fish Island South including Bow Midland West & Bow Goods Yard East?
8. Has the full capacity for new residential development in Hackney Wick & Fish Island been assessed (Page 149 refers to 4,500 new homes over the plan period). Is there firm evidence to support the argument that unnecessary retention of employment space outside employment clusters holds back growth in housing?
9. Are new canal bridges at Fish Island justified?
10. Do the Site Allocation policies for Hackney Wick and Fish Island place an unnecessarily strong emphasis on heritage and character-led development and potentially constrain innovative but high quality new development?
11. Is Policy SA1.1 too prescriptive over "roof forms"?
12. Is the key to the diagram for Policies SA1.1 onwards sufficiently clear? For example what is meant by "other open space"?
13. Hamlet Industrial Estate – is there a discrepancy between Figure 28 and its identified "green spaces" and Policy SA1.2?
14. Should development at Hamlet Industrial Estate be an exception to the Area Priorities set out in paragraph 10.3 and beginning with "heritage-led regeneration and high-quality design"?

15. Is Policy 1.6 concerning the height of buildings in Hackney Wick and Fish Island justified and necessary, in view of the inclusion of Policy BN10 in the plan?
16. Is the linear park proposed in Policy SA1.3: Hepscott Road justified? Are the criteria referring to public realm on Wansbeck Road and waste sound? Does the date of 2020 onwards for phasing and implementation need to be changed?
17. Is the provision of non-residential, ground floor frontage in proposals for Bream Street (Policy SA1.4) likely to undermine the achievement of good design? Would the provision of some ancillary retail development be justified?
18. Regarding Policy SA1.6, Neptune Wharf, is there inconsistency in the requirement for buildings with a maximum frontage height of 6 storeys, when compared with development recently approved in this locality (7 storeys and an 11 storey tower are referenced)?
19. Should Policy SA1.7: East Wick and Here East refer to the new east-west, off road connection between the Canal Park and Waterden Road? Should it include references to access to Lee Valley Regional Park?
20. Should the boundary for SA1.8 Sweetwater include the waterspace as requested by the Canal and River Trust, to secure complementary development that respects its context?
21. Should an additional new site allocation for mixed use development with improved north-south access at Hepscott Road/Rothbury Road on BT land be included in the Local Plan?

Potential participants:

| Respondent Reference Number | Respondent Name and Organisation |
|------------------------------------|---|
| REP.LP.014 | Vivian Bellamy |
| REP.LP.020 | John Moran, Health and Safety Executive |
| REP.LP.023 | Michael Holloway, Daniel Watney on behalf of Roypark (1988) Ltd and Newstates Ltd |
| REP.LP.025 | Ian Shacklock |
| REP.LP.026 | Jeremy Castle, Deloitte on behalf of iCity. |
| REP.LP.027 | Lucy Rogers/Tom Ridge, East End Waterway Group |
| REP.LP.032 | Vilna Walsh, Firstplan Ltd on behalf of Aggregate Industries (UK) Ltd and London Concrete Ltd |
| REP.LP.036 | Owen Whalley, LB Tower Hamlets |
| REP.LP.044 | Malcolm Tucker, GLIAS |
| REP.LP.047 | Katie Glasgow, London Borough of Hackney |
| REP.LP.058 | Austin Mackie on behalf of British Telecom |
| REP.LP.064 | Quod |
| REP.LP.065 | Austin Mackie on behalf of O'Shea Ltd and Galliard Homes Ltd |
| REP.LP.066 | Tim Gaskell, CMA |
| REP.LP.070 | Lee Melin |
| REP.LP.071 | Gerald Eve LLP, Sulzer Dowding |
| REP.LP.073 | Canal and River Trust |
| REP.LP.095 | Martin Richman |
| REP.LP.096 | Just Space |
| REP.LP.097 | Tom Ridge, Adam English and Melissa Parker |

Questions relevant to Sub-Area 2, North Stratford & Eton Manor

1. LB of Waltham Forest commented on Eton Manor that it “objects to the orientation of the site that turns its back on the Borough”. Please would the LB explain this objection; how might it be overcome?
2. Should the Chobham Farm site allocation for Policy SA2.1 be extended to include land north of Henrietta Street with planning permission for employment use?
3. Are Policies SA2.1-2.3 consistent with Chapter 5 of the Local Plan including Policy H1 which seeks to secure a mix of house types and with the achievement of 35% affordable housing? Should they be more explicit in their requirements for different house types and tenures? Would the policies secure integration with the surrounding low rise housing estates in Waltham Forest?
4. Policies SP1 and B1 of the Local Plan support the growth and maintenance of existing businesses and employment uses. Is there a conflict with policies in Sub-Area 2 which, it is claimed, permit the displacement of well and long-established employment uses without clear provision for alternative, appropriate sites?
5. Should there be more information as to the diversity and balance of community facilities which should be provided (Policies 2.4 and SA2.2)? And is there justification for the criticism that East Village is a new local centre with too much retail space and insufficient other uses to create a lifetime neighbourhood?
6. With proposed change no 92 in LD/26, does Table 8 accurately record the prevailing building heights in the sub-area? Should this section of the Local Plan give stronger guidance and more precise limits on the height and massing of new buildings?
7. Should the Vision for Sub-Area 2 refer to the role of the Eton Manor area which contains the Lee Valley Hockey and Tennis Centre, as Lee Valley Regional Park Authority suggest?
8. With regard to poor air quality on the A12 and Leyton Road, what more exactly do critics expect the Local Plan to say and do?

Potential Participants:

| Respondent Reference Number | Respondent Name and Organisation |
|-----------------------------|---|
| REP.LP.008 | Hannah Clifton, London Borough of Newham |
| REP.LP.013 | Alan Gunne-Jones, Planning & Development Associates Ltd on behalf of Gowlain Building Group Ltd |
| REP.LP.031 | Steve Butters, CPRE |
| REP.LP.033 | Steffan Rees, Quod on behalf of QDD Athletes Village UK Limited |
| REP.LP.037 | Julian Cheyne |
| REP.LP.082 | LB Waltham Forest |
| REP.LP.096 | Just Space |

Questions relevant to Sub-Area 3, Central Stratford & Southern Queen Elizabeth Olympic Park

1. Are the policies and proposals for Sub-Area 3 consistent with the Core Strategy for LB Newham, adopted in 2012? In particular, should the Stadium area be defined as a site allocation in the LLDC Local Plan, with a secondary school proposed there?
2. Paragraph 12.3 states that a significant amount of residential and office floorspace has planning permission, but goes on to indicate that these may not be implemented as first intended. What are the reasons for this, and does it imply some uncertainty around delivery of the sub-area priorities and policies? Is there a need for changes (in addition to those in LD26) to give more flexibility and ensure the effectiveness of the plan?
3. Is concern that retail and leisure facilities in the Metropolitan Centre may be unavailable to lower income households currently served by Stratford High Street, market stalls and older shopping facilities properly addressed through the Local Plan? Are the policies for this sub-area consistent with offsetting and reversing the growth of polarisation and division thereby promoting convergence?
4. Is there tension between Policy 3.1 seeking new medium-scale retail, leisure and community uses in the traditional High Street and Policies SA3.2 & SA3.3 permitting edge-of-centre use development?
5. Policy SA3.1 seeks a town centre link bridge to connect the Chobham Farm South site, but would it be an enhancement rather than a prerequisite. Is the link bridge justified?
6. Policies SA3.2 and SA3.3 require design to take account of the waterside, but should a requirement to take account of flood risk be introduced into Policy SA3.2? And should the site in Policy SA3.3 be extended to include the waterspace with opportunities for mooring and leisure uses?
7. Stratford Metropolitan Masterplan [BPP/10, Page 12] promises regeneration that enables the community to stay together. Is Policy SA3.4 for Greater Carpenters District consistent with that approach? Should the Local Plan confirm that it supports sensitive refurbishment, building on existing homes, businesses and community infrastructure, with active community engagement following from the Carpenters Community Plan, as some propose?
8. On Policy SA3.4, how many new homes (low and high rise), how much business space and education provision is expected? Is delivery of the first development phase in the next 5 years realistic?
9. In view of representations from LB Newham, should Policy SA3.6 - Rick Roberts Way, with provision of an all-age school alongside residential development, be amended?

Potential Participants:

| Respondent Reference Number | Respondent Name and Organisation |
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| REP.LP.037 | Julian Cheyne |
| REP.LP.039 | Steffan Rees, Quod on behalf of SCBD Limited |
| REP.LP.045 | Alistair Henderson, Planning Perspectives on behalf of National Grid Property |
| REP.LP.046 | Osita Madu |
| REP.LP.049 | Ulrike Steven, What if:projects Ltd |
| REP.LP.053 | DP9 |
| REP.LP.073 | Canal and River Trust |
| REP.LP.074 | Karen Tang on behalf of Acme Studios |
| REP.LP.086 | Deloitte on behalf of UCL |
| REP.LP.087 | Joseph Alexander |
| REP.LP.091 | London Tenants Federation |
| REP.LP.096 | Just Space |
| REP.LP.108 | Habibur & Farina Khan |
| REP.LP.121 | Rev. David Richards |

Questions relevant to Sub-Area 4, Bromley-by-Bow, Pudding Mill, Sugar House Lane and Mill Meads

1. Should a site for a new secondary school to the south of the Olympic Stadium be identified, as sought by LB Newham?
2. Should the Area Profile be extended to include reference to Lee Valley Regional Park and its role in respect of Three Mills Island, or do minor amendments nos 115 & 118 cover the point?
3. Proposed amendment no 114 in LD26 sets out prevailing and generally expected building heights. Does this overcome the objections raised by some that the policies for Sub-Area 4 are too prescriptive about building heights?
4. Are Policies 4.1 and SA4.1 which propose a new district centre at Bromley-by-Bow credible and viable:
 - in the light of changing trends in retailing highlighted in the FALP, Policy 2.15;
 - bearing in mind that planning permission has been granted for the northern part of the SA4.1 site (referenced on Page 215), and therefore the landowner(s) of the southern part would be expected to provide all the items in Policy SA4.1 ?
5. Is Policy SA4.2: Sugar House Lane fully justified in terms of the mix of uses, number and type of new homes and new infrastructure which it seeks? If not, what substantive evidence supports a different mix?
6. Is the requirement in Policy SA4.3 Pudding Mill for 25% non-residential floorspace to the west of Cooks Road and around the Crossrail portal justified? Should the policy allow more flexibility to reflect market conditions and enable more housing development?
7. Should Policy SA4.3 or supporting text refer to the proximity of the Pudding Mill site to the Bow Midland West Rail site, since new development should have regard for its operational requirements?
8. How many homes are sought on this site, and why should the policy omit the requirement for a significant proportion of family homes?
9. Aren't the proposed (i) re-alignment of Barber's Road to give screening from Crossrail and (ii) the provision of industrial development along the western edge of the site to separate residential uses from noise and pollution along the A12, positive measures to achieve a high quality development?
10. Should the site be enlarged to include land between DLR rail track and High St Stratford, and between the A12 and Bow Back River?
11. Is delivery of SA4.3 "from 2015" feasible?

Potential Participants:

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| REP.LP.007 | Peter Brady, Planning Law Practice on behalf of Gilcris Property LLP |
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| REP.LP.015 | Manoranjitham Saravanamuthu |
| REP.LP.029 | GL Hearn on behalf of Danescroft Land Limited |
| REP.LP.032 | Vilna Walsh, Firstplan Ltd on behalf of Aggregate Industries (UK) Ltd and London Concrete Ltd |
| REP.LP.034 | Victoria Bullock, Barton Wilmore on behalf of Bashir |
| REP.LP.035 | Victoria Bullock, Barton Wilmore on behalf of Gallagher |
| REP.LP.056 | Richard Brown |
| REP.LP.057 | Diana Thomson, Savills |
| REP.LP.068 | Barton Wilmore on Behalf of Gold Pot Holdings |
| REP.LP.078 | GL Hearn on behalf of Vastint UK |
| REP.LP.079 | GVA on behalf of Workspace Group Limited |
| REP.LP.080 | Bromley by Bow Centre |
| REP.LP.089 | GLA |
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