

# **Statement on behalf of the London Legacy Development Corporation (9<sup>th</sup> February 2015)**

**Examination - London Legacy Development Corporation Local Plan 2015 to 2031**

**Inspector's Matters, Issues and Questions**

**Matter 7 (Sub Area 3)**

**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?**

The policies and proposal for Sub Area 3 are consistent with London Borough of Newham Core Strategy [BPP/2]. Being a strategic document the Core Strategy only identified strategic sites within the area.

At this stage in time it is increasingly likely that a school could be provided on the stadium island site. However, a site allocation is not necessary for a school to be delivered at this location and paragraph 12.14 of the Local Plan allows for such circumstances by consideration of other policies of the Local Plan, which in the case of a school will primarily be Policy Cl.2. See the Schools Explanatory Note (Appendix 1 to Matter 5, Question 6, particularly paragraphs 7-9). Given the background set out in this note it is not considered appropriate to specifically identify a secondary school site in this location.

- 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?**

Paragraph 12.3 does not imply uncertainty around delivery. It is simply clarifying that much of the development proposed within the area is already permitted in outline (and thus the final form of development has not yet been determined in detail) and acknowledging the possibility of amended schemes coming forward. The area priorities therefore do not need amending and there is no need for more flexibility to ensure effectiveness.

- 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?**

Stratford Metropolitan Centre encompasses parts within the planning control of the London Borough of Newham as well as the Legacy Corporation. The centre as a whole

offers a diverse range of provision from high end comparison retail, convenience goods, market stalls and other facilities catering for more everyday requirements. The provision of additional retail floorspace will further strengthen the whole of the centre's offer, enabling reinforcement of the Metropolitan Centre as one cohesive, but compact centre with a wide range of different town centre offers, providing for diverse requirements and ensuring long term vitality and viability.

The aligned planning policy approach between both local planning authorities will prevent physical and economic separation between the constituent parts of the Metropolitan Centre, having positive impacts for residents and local business communities through local job creation, economic growth and investment.

**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?**

There is no tension between medium-scale retail, leisure and community uses on the High Street and the edge-of-centre development at SA3.2 and SA3.3. Policy 3.1 sets out that medium-scale development will only be appropriate if impacts assessment can demonstrate positive impacts on the Centre. The strategic leisure and community uses proposed within the site allocations are appropriate in relation to the sequential assessment due to a lack of available sites for such uses within the Centre itself. Any small-scale retail proposed within the site allocations will be to meet local requirements. Site allocations SA3.2 and 3.3 also cross-refer to Policy B.2 to ensure that the uses proposed are appropriate in relation to the edge-of-centre location.

**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?**

The link bridge referred to within SA3.1 is justified to fully integrate the Chobham Farm South site into the town centre. Failure to provide this link would mean that access to the site would only be gained from the north which is outside the town centre boundary. This would mean that the site would be unable to be considered as a fully integrated part of the centre and thus appropriate uses would be akin to edge-of-centre, rather than a town centre location.

**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?**

It is not necessary to introduce a requirement to take into account flood risk within the site allocations given the inclusion of Policy S.8. This is the approach which has been taken throughout most of the site allocations within the Local Plan. The site allocation boundary has not been extended to include the waterspace to the north as this is Metropolitan Open Land. Any proposals for mooring and leisure uses within this part of the area will need to satisfy the requirements of Policies BN.2 and BN.6 and London Plan Policies 7.17 and 7.18 [RP/3].

**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?**

The site allocation as a whole is consistent with the approach of the Newham Core Strategy [BPP/2] which forms the Development Plan for the area. The Stratford Metropolitan Masterplan [BPP/10] is not an adopted planning policy document (see response to question 11 of Matter 1). It is the Legacy Corporation's aspiration that the development of the site allocation be phased appropriately to enable the community to remain together.

The site allocation, combined with the other policies within the Local Plan, allow for the protection of residential, business floorspace and community infrastructure, aspirations aligned within the Carpenters Community Plan. Community engagement will be a central form of any site proposals from LBN as the landowner and housing authority, but also through the planning application processes.

**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?**

Like all other site allocations within the Local Plan, SA3.4 has not included detail on the number and type of homes to be provided. Some estimations in relation to housing have been made within the SHLAA but in order to achieve flexibility and the most appropriate form of development it is not considered appropriate to specify precise figures for the quantum of development on the site. A number of Local Plan policies will determine the amount of housing, business and education space to come forward within proposals. Policy SP.1 safeguards against a loss of existing residential units. Policy B.1 will ensure that the existing amount of employment floorspace is maintained or re-provided within any proposal relating to employment land. Policy CI.1 will protect community and education facilities.

Development has already commenced on a scheme providing 431 student bedspaces lying within the site allocation boundary. It is understood that later phases of the site allocation are likely to also commence within this first five year period, therefore the phasing of the site from 2015/16 to 2020/21 is appropriate.

**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?**

Site Allocation SA3.6 contains flexibility to account for changing circumstances, setting out in bullets 2 and 3 what would be expected should an all-age or secondary school be delivered more suitably within another location. The phasing of this site to the latter part of the plan period enables provision to be fully reviewed subject to available evidence at the time, to ensure that school provision meets requirements throughout the period.