

Statement on behalf of the London Legacy Development Corporation (9th February 2015)

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.

1. Do the Local Plan's Vision and Objectives, and the visions, profiles and priorities for each Sub-Area justify all the site allocations?

The sub area visions, profiles and priorities are specifically shaped by the Legacy Corporation's vision and objectives for its area as a whole as set out in Section 3 of the Local Plan. These local visions and priorities focus on the distinctiveness of each sub area and help to define the balance of uses sought within each site allocation. Each site allocation has an important role within each sub area in continuing, developing and establishing the character of that location, while also playing a role in meeting and exceeding the housing targets and growth aspirations set out within the Local Plan as a whole. These cover the range of identified needs in relation to the Local Plan's evidence base and in many cases also take account of the precedents set by extant planning permissions for significant sites, identified within Table 12 of the Local Plan (Key Housing Sites, page 235). The Sites Report [TBP/06] also identifies how each site allocation has been considered in terms of availability, suitability and the wider relationship to the meeting of need or other factors that have influenced the types and mix of uses sought.

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.

The diagrams and illustrations within the Local Plan have been designed to provide an illustrative function appropriate to their particular context. Figure 31, for example, is intended to act as a key diagram illustrating the overall strategy and approach to the sub area, such as the broad function and location of key parts of the sub area, rather than a precisely mapped indication of specific policies and proposals. Where cartographic accuracy is necessary, for example in showing the extent of site allocations of employment and town centre designations, these are included on the Proposals Map as required by the NPPF.

Figure 40 within the Local Plan (Site Allocations, page 238) shows all site allocations on an illustrative map base of the Legacy Corporation area as a whole and, alongside the Proposals Map, is considered to provide an adequate approach to showing the location of and relationship between the site allocations.

3. Are all the site allocations sufficiently clear as to what development is sought, how much, and when it might be delivered?

The site allocations are considered to provide a sufficient level of clarity as to what development is being sought. The text within each site allocation (as amended by LD/26) in combination with the associated site allocation illustrative map provide a clear indication of location and types of use. Specific quanta of development are not specified within the site allocations, as the Local Plan as a whole is designed to set parameters for development through the application of the relevant plan policies (including associated London Plan policies). For example, Policy BN.10 in conjunction with the associated heights sections within the sub area text provides a context for determining the height of development but does not specifically constrain the amount or density of development that a site could achieve. This approach is designed to provide sufficient flexibility over the lifetime of the Local Plan to enable appropriate solutions to each site to be considered at the time they come forward for development. Each site allocation includes a broad indication of expected phasing within the lifetime of the Local Plan to indicate when it is expected that the site would 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?

The format of each Local Plan site allocation does not specify the exact quantity of each proposed use to come forward on the site. This approach is designed to provide sufficient flexibility over the lifetime of the Plan to enable appropriate solutions to each site to be considered at the time they come forward for development. It is therefore not appropriate to amend this standard approach.

Development proposals that fall within the boundary of each allocation will be expected to deliver a density of residential development that is no lower than the sustainable residential quality (SRQ) density matrix parameters for their identified PTAL levels. The appropriate housing density for the site will be established through the application process maximising housing delivery in accordance with Policy SP.2 and H.1. In relation to employment space, proposals including existing employment land will be expected to comply with Policy B.1 maintaining or re-providing existing employment floorspace. The type and scale of new employment floorspace within site allocations shall be appropriate to the location and other policies within the Local Plan, also to be determined on a site-by-site basis.

The housing trajectory includes assumptions about what is likely to come forward within the plan period, based upon permissions granted and assumptions within the SHLAA. As shown within Appendix 2, sites expected to come forward within the first five years in most cases have planning permission (either detailed or outline), with some additional capacity expected within Sub Area 1 during the first five years of the plan period. Table 12 shows the planning permission reference number for many of these sites. The permissions given in full include details on the size and tenure provided; generally the outline schemes will leave size and tenure mix to the reserved matters. Therefore, it is not appropriate to include this detailed information on size and tenure within the allocations as, alike above, this will be determined according to site-specific factors and policies H.1 and H.2.

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?

It is not considered that there are gaps in key information about supporting infrastructure within the sub area sections. The Infrastructure Delivery Plan Study [LEB/20] is considered to have adequately assessed infrastructure requirements and, where key infrastructure such as schools or open space are considered to be required, these are specifically identified within the appropriate site allocation.

It is not considered that individual site allocations require detailed information on flood risk or mitigation measures. Each site allocation identifies the relevant level of flood risk for that site. Policy S.8 then sets out the appropriate approach to flood risk. This is considered to be appropriate, taken together with the additional changes identified within LD/26 and the minor additions included within the Statement of Common Ground with the Environment Agency [SCG1]. The Sites Report (TBP/06) also includes a Flood Risk sequential test and, where necessary, exceptions test for each site allocation which provides specific advice appropriate to each allocation reinforcing the approach to flooding within the Local Plan. The approach to flood risk and the types of measures that might be required for mitigation set out in the Local Plan is therefore considered to be robust.

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?

Pages 17-26 of the Table of Minor Amendments and Corrections [LD/26] includes a proposed adjustment to the order of text within each site allocation to clarify what is considered to be policy and that which is supporting text. The length of site allocations is considered to be appropriate and has been dictated by the circumstances and relative complexity of each site allocation. There are also significant differences in size and scale of some site allocations requiring a more detailed approach.

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?**

The Sites Report [TBP/6] sets out how site allocations have been identified and the factors that have influenced this, including availability and suitability. This has taken account of any appropriate potential policy or environmental constraints. The Sites Report also outlines the Call for Sites consultation process that has been undertaken and influenced the selection of site allocations. A large proportion of sites already benefit from an outline or full planning permission which has also influenced the site allocation process to an appropriate extent. Those sites are listed at Table 12 of the Local Plan (Key Housing Sites, page 235).

No specific evidence has been received by the Legacy Corporation to suggest that a particular site allocation is potentially unviable, undeliverable or would be likely to require a different timescale to that indicated within the Local Plan.

TOTAL WORDS IN THIS STATEMENT: 1,264