

## Section 8 – Creating a sustainable place to live and work

Change Reference Number		Type of change	Proposed change
C204	Paragraph 8.1	Minor	Paragraph 8.1 Ensuring environmental sustainability' is one of the Legacy Corporation's Key Priorities set out in its vision. This Local Plan as a whole seeks to achieve the sustainable development of the Legacy Corporation area that results in a place that is economically, socially and environmentally sustainable. This is reflected in Policy SD.1: Sustainable development, following the vision <u>set out in the Draft New London Plan in Section 3 of the Local Plan</u> . That section, 'Our area', outlines the key sustainability challenges and opportunities within the Legacy Corporation area.
C205	Paragraph 8.2	Minor	Paragraph 8.2 To ensure that this Local Plan embraces all aspects of sustainability, this section supplements the other policies in this Local Plan relating to sustainability issues by: <ul style="list-style-type: none"> <li>• addressing health and wellbeing, and</li> <li>• focusing on those matters that will help to make the Legacy Corporation area and the development within it resilient to climate change (including relevant mitigation measures) and addressing the requirement to contribute towards the national and London Plan targets for securing reductions in carbon dioxide emissions, <u>and the expansion of electronic communication networks, including telecommunications and high-speed broadband.</u></li> </ul>
C206	Paragraph 8.3	Minor	Paragraph 8.3 In applying the policies of this Local Plan together as a whole (see paragraph 3.7 and 3.8 of this Local Plan), the Legacy Corporation's aim is to ensure that a significant contribution is made to achieving a healthy place to live and work, that the Legacy Corporation's area is a place that achieves a high level of wellbeing and that the positive impacts of securing sustainability will reach beyond the Legacy Corporation boundary to those who live and work in the surrounding areas of east London. <u>To avoid repetition only Objective 5 is included within this section, however to reflect the overarching aims that the Legacy Corporation have around sustainability both Objectives 4 and 5 should be referenced when reading this section.</u>

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C207	Objective 5	Minor	Objective 5: Deliver a smart, sustainable and healthy place to live and work
C208	SP.5: A sustainable and healthy place to live and work	Minor	<p>Strategic Policy SP.5: A sustainable and healthy place to live and work</p> <p>The Legacy Corporation will work with its partners to achieve a sustainable future for those who live and work in its area and contribute to a sustainable future for east London and London, by:</p> <p>Ensuring that development contributes to the health and wellbeing of those living and working in the area</p> <p>Ensuring that development meets the needs of the present without compromising the ability of future generation to meet their own needs</p> <p><del>Contributing to the Mayor's target for reducing London's carbon dioxide emissions by 60 per cent (below 1990 levels) by 2025, including through energy efficiency measure in buildings and increasing the use and availability of decentralised energy</del> <u>objective of London becoming a zero-carbon city by 2050 utilising all measures of efficiency and energy reduction available informed by the energy hierarchy.</u></p> <p>Reducing water use and encouraging the utilisation of rainwater harvesting, grey water recycling and use of non-potable water sources</p> <p>Minimising construction, commercial and householder waste</p> <p>Encourage a reduction in materials use and increase in materials reuse, recycling and composting, <u>ensuring that there is zero biodegradable or recyclable waste to landfill by 2026 and meeting or exceeding the recycling targets set out in the Draft New London Plan</u></p> <p><u>Requiring retention of existing waste management facilities as set out in policy S.7</u></p> <p>Minimising the travel demand and increasing opportunities for walking and cycling <u>to support in the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041</u></p> <p>Requiring developments to mitigate and manage the effects of climate change</p> <p>Avoiding overheating and excessive heat generation as a result of new development</p> <p>Urban greening through planting in the public realm and private spaces and green and brown roofs</p> <p>Requiring Sustainable Urban Drainage measures (SuDs), restriction of surface water run-off rates</p>

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			<p>and interception of pollutants prior to discharge, where appropriate</p> <p>Protecting existing and encouraging the provision of new public and private open spaces and an increase of tree coverage in streets and open spaces</p> <p>Facilitating sustainable lifestyles for residents by considering the performance of buildings and spaces in operational use</p> <p><u>By supporting the provision and expansion of digital infrastructure within the Legacy Corporation area and enabling development for future infrastructure.</u></p>
C209	Case Study 12: Chobham Manor exemplar homes	Minor	<p>Case Study 12: Chobham Manor exemplar homes</p> <p>Chobham Manor is the first phase of the Legacy Communities Scheme and includes 828 new homes, a community centre and local retail, leisure and employment space. All dwellings <del>will be</del> <u>have been</u> built to the Fabric Energy Efficiency Standards (FEES) <del>that will be</del> applied by government to zero-carbon dwellings <del>post-2016</del>. All buildings <del>will</del> <u>are connected</u> to the district heating network. All homes <del>will</del> have smart meters for heat, electricity and water consumption. The planning permission required <del>d</del> inclusion of 25 exemplar homes <del>that will be capable of achieving a Code for Sustainable Homes score of at least 80, including</del> <u>with</u> a requirement to be zero carbon through on-site measures and achieving water consumption of 80 litres per person per day (lppd). The first phase includes ten exemplar homes that will also include the following additional measures:</p> <ul style="list-style-type: none"> <li>Materials and construction methods that allow flexibility in use/easy deconstruction for reuse elsewhere</li> <li>Healthy materials with commitment to low Volatile Organic Compound paints</li> <li>Use of recycled materials such as brick for garden walls</li> <li>Efficient cooking appliances such as induction hobs</li> <li>Optimisation of output from PV panels; timers on washing machines and dishwashers to minimise energy consumption and manage peak demands</li> <li>Sustainable choices for fixtures and fittings by offer of AAA-rated fridges, recycled carpet, recycled glass tiles, bamboo flooring etc.</li> </ul>
C210	S.1: Health and wellbeing	Minor	Policy S.1: Health and wellbeing

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			<p>Applications for major development schemes will be required within their Design and Access Statement to describe how the scheme will contribute to the health and wellbeing of those who will live and/or work within the development proposed and would not significantly adversely affect those who live and/or work within the vicinity of the proposed development. This should include information on access to schools, health services, community facilities, leisure activities, local shops and services, parks and publicly accessible open spaces. Major development schemes should also demonstrate <u>how they will deliver improvements that support the ten Healthy Streets Indicators as set out in the Draft New London Plan and Transport for London guidance, as well as access to the development via public transport and permeability through walking and cycling and how these link up with existing networks. They should also aim to reduce the dominance of vehicles on streets and demonstrate that they meet the requirements of all other relevant policies in this Local Plan.</u> <del>that they are located and designed to encourage active and healthy lifestyles and that they meet the requirements of all other relevant policies in this Local Plan, including those that encourage walking and cycling.</del></p>
C211	Paragraph 8.4	Minor	<p>Paragraph 8.4  The profile of the existing population within the Legacy Corporation area, is identified in Section 2 of this Local Plan <del>and also reflected in its wider surrounding localities, is one where life expectancy, health, educational attainment and other quality-of-life indicators are lower than the London and national averages.</del> The Legacy Corporation area, with its distribution of transport nodes, town and Local Centres, parklands and waterways, provides a context and setting for one of London's most significant areas of new development and regeneration, and a unique opportunity to develop a series of places that have the physical and mental health and wellbeing of those who live and work there at its core. These significant changes in the local environment and the high level of accessibility within new development, the public realm and other outside spaces, help to set the scene for enabling the future population to be one that meets at least the average for London as a</p>

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			whole in accordance with the convergence strategy for the Growth Boroughs.
C212	Paragraph 8.5	Minor	<p>Paragraph 8.5</p> <p>Each major development scheme will, by its nature, play a significant part in achieving the aims of this policy. It is important that these development proposals demonstrate that they are helping to achieve this in a manner that is appropriate to their specific circumstances. Physical development will set the scene for existing and new communities to develop and change, with community organisations, local groups and service providers, including faith groups, having a major role in ensuring that these are communities that thrive. It is important that the Design and Access Statements for major schemes identify, by reference to policies within this <u>Draft New</u> Local Plan and the <u>Draft New</u> London Plan, those elements of the proposed scheme that will positively contribute to achieving positive outcomes for those who will live, work or otherwise use the development proposed.</p>
C213	S.2: Energy in new development	Minor	<p>Policy S.2: Energy in new development</p> <p>Developments will be expected to minimise carbon dioxide emissions to the fullest extent possible by application of the Energy Hierarchy as set out below:</p> <ol style="list-style-type: none"> <li>1. Reducing energy requirements</li> <li>2. Supplying the energy that is required more efficiently <u>and where possible generating, storing and using renewable energy on-site</u></li> <li>3. Meeting remaining energy requirements through renewable energy sources where viable <u>and exploiting local energy resources</u>.</li> </ol> <p>Major development proposals should <del>as a minimum meet the regulated carbon dioxide emissions standards outlined within the London Plan</del> <u>be net zero-carbon, with carbon dioxide emissions reduced from both construction and operation. The Draft New London Plan sets this out as a minimum on-site reduction of at least 35 per cent beyond Building Regulations is to be expected. The Draft New London Plan requires a minimum on-site reduction of carbon emissions of at least 35 per cent beyond Building Regulations 2013. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. For residential buildings:</u></p>

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			<p><del>• 2015–2016: 40 per cent improvement on the 2010 Building Regulations Target Emission Rate</del></p> <p><del>• 2016–2031 zero carbon (including allowable solutions or equivalent contribution to the Carbon Off-setting Fund).</del></p> <p><del>Non-domestic proposals should achieve a 35 per cent improvement up to 2016, meet building regulation requirements from 2016, and be zero carbon from 2019 onwards.</del></p> <p><del>Where these targets cannot be met on site, and until any nationally recognised Allowable Solutions system is in place, a financial contribution to the Legacy Corporation Carbon Offsetting Fund will be required. A supplementary planning document will be prepared, setting <u>The Legacy Corporation Carbon Offset Supplementary Planning Document (adopted August 2016)</u> sets out the rate per tonne of carbon dioxide and the scheme for applying the funds raised.</del></p> <p><del>Major applications will be required to provide an Energy <u>Strategy Statement</u> that sets out how the development has addressed the Energy Hierarchy and meets or exceeds the targets above and the source and method of proposed energy supply <u>and will be expected to monitor and report on energy performance.</u> Energy statements should be prepared in accordance with Part D of London Plan Policy 5.2 and provide an estimation of unregulated emissions for development in use, alongside calculated emissions associated with building regulations. <u>Energy Strategies should be prepared in accordance with Policy SI2 of the Draft New London Plan.</u></del></p> <p><del><u>Cross-reference to policies: S.3; S.4; S.7; S.8</u></del></p> <p><del><u>London Plan policies: SI3</u></del></p>
C214	Paragraph 8.6	Minor	<p>Paragraph 8.6</p> <p><del>In 2009, carbon emissions from buildings accounted for 43 per cent of the total (Department for Communities and Local Government). In his <u>Draft</u> London Plan, the Mayor sets out his ambition for London to be net zero-carbon to reduce carbon emissions in London to 60 per cent below their 1990 levels, by 2025. This reduction is a strategic priority that has the potential to make a significant contribution in a London context to minimising the projected levels of climate change. <u>This fits with the wider national target set in the 2008 Climate Change Act and government targets for achieving new zero-carbon homes by 2016 and for zero-carbon non-domestic buildings by 2019.</u> Achieving</del></p>

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			reductions in carbon emissions from these sources is an essential element of a London-wide strategy to contribute towards reducing the rate of identified climate change and improving air quality.
C215	Paragraph 8.7	Minor	<p>Paragraph 8.7</p> <p>The Legacy Corporation <del>will prepare a</del> <u>has an adopted</u> supplementary planning document <del>to set</del> <u>which sets out</u> the rate to be applied to its area-wide carbon off-setting scheme and identifies <del>the</del> <u>the</u> mechanism for collecting and allocating the funds raised to ensure that funds are applied in a way that adequately mitigates the carbon dioxide emissions from the contributing development. The scheme for allocating funds raised <del>will take</del> <u>takes</u> into account <del>the</del> local opportunities to aid appropriate retrofitting of carbon saving measures to existing buildings and structures within and around the Legacy Corporation area. The rate set <del>will need to ensure</del> <u>ensures</u> that development within the Legacy Corporation area remains viable. The Legacy Corporation's carbon off-setting scheme, designed to meet these carbon targets for the Legacy Corporation's Legacy Communities Scheme development, <del>will provide</del> <u>provides</u> the basis for this wider scheme. Application of the London Plan Energy Hierarchy (<del>London Plan Policy 5.2 set out in Chapter 9 of the Draft New London Plan</del>) will be important:</p> <ol style="list-style-type: none"> <li>1. <b>Be lean:</b> use less energy</li> <li>2. <b>Be clean:</b> supply energy efficiently</li> <li>3. <b>Be green:</b> use renewable energy</li> <li>4. <b>Offset</b> <u>(to be highlighted by new Figure image)</u></li> </ol> <p>Maximisation of energy efficiency should take account of all aspects of a scheme, including, for example, street lighting and communal lighting using LED or other efficient lighting technology. Outdoor lighting should also minimise losses of light to the sky.</p>
	S.3: Energy infrastructure and heat networks	No change	
	Paragraph 8.8	No change	Paragraph 8.8
	Paragraph 8.9	No change	Paragraph 8.9
	Paragraph 8.10	No change	Paragraph 8.10
	Paragraph 8.11	No change	Paragraph 8.11
	S.5: Water supply and	No change	

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	waste water disposal		
	Paragraph 8.12	No change	Paragraph 8.12
C216	Paragraph 8.13	Minor	Paragraph 8.13 It is also important that strategic and local projects are supported that help to address the issue of discharge of combined drainage into watercourses. Projects such as the Thames Tideway Tunnel will make a significant difference to water quality in the River Thames, while the Lee Tunnel <u>does this more locally</u> <del>will do so more locally when operational following its completion in 2015</del> . Locally, smaller-scale projects that help to separate foul and surface water drainage will also be important to help address water quality within the River Lee and associated watercourses and meet the requirements of the EU Water Framework Directive (2000/60/EC).
	Paragraph 8.14	No change	Paragraph 8.14
	Case Study 14	Deletion	Case study deleted
C217	Policy IN.1: Telecommunications infrastructure and impact of development on broadcast and telecommunications services	Major	<b>Becomes Policy S.6: Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure</b> <del>Telecommunications infrastructure and impact of development on broadcast and telecommunications services</del> Increasing digital connectivity, safeguarding existing communications provision and enabling future infrastructure <del>In considering proposals for new telecommunications infrastructure, the Legacy Corporation will consider proposals against other policies in this Local Plan. In particular, the Legacy Corporation will need to be satisfied that new telecommunications equipment does not have a significant adverse impact on the appearance of existing buildings and amenity of the area in which it is proposed to be located. Where possible, the Legacy Corporation will require new telecommunications and radio equipment to be located on existing masts, buildings and other structures to minimise the number of installations, unless the need for a new site has been justified. Where development is proposed that may have significant adverse impact on and interfere with existing telecommunications or broadcast services, the Legacy Corporation will require that an impact statement is prepared and mitigation plan implemented as necessary through a Section 106</del>



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			<p><del>Agreement prior to occupation of a proposed development.</del></p> <p>Digital communications and connectivity is a key element in enabling growth and facilitating innovation within the Legacy Corporation area, new development <del>will seek to</del> should:</p> <p>As set out in the Draft New London Plan to achieve greater digital connectivity than set out in part R1 of the building regulations</p> <p>Safeguard existing communications infrastructure, or where a significant adverse impact has been identified, prepare an impact statement and implement a mitigation plan as necessary through a Section 106 agreement prior to occupation of the proposed development, especially in relation to mobile connectivity</p> <p>Co-locate services where possible on existing structures, such as masts, or within appropriate street furniture, such as street lighting, to ensure the effective use of public realm to accommodate well-designed and located mobile digital infrastructure that mitigates the impact of new infrastructure on the existing built environment</p> <p>Ensure that sufficient ducting space is provided for future digital connectivity infrastructure</p> <p>As technologies continue to develop that improve efficiency and help reduce resource usage development proposals should consider the latest innovations to help support requirements around initiatives such as the zero-carbon target and the Healthy Streets Approach. The Legacy Corporation supports the usage of innovations and new technologies that go above the expectations already set in policy to make new development sustainable in the long term. Where it is identified that space should be left for future technology or innovations, such as the requirement for space for ducting already set out above, the Legacy Corporation supports these inclusions and making the most of opportunities to enable future infrastructure where there is evidence to show their benefit.</p> <p><u>Cross-reference to policies: B.1; S.4; CIL Charging Schedule; CIL Infrastructure List; Planning Obligations SPD</u></p> <p><u>London Plan policies: SI6</u></p>
C218	Paragraph 7.5	Minor	<p><b>Becomes paragraph 8.15</b></p> <p>Provision of high-quality communications infrastructure is essential for economic growth. The Legacy Corporation therefore supports provision of</p>

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			improved infrastructure <u>and enabling space for new infrastructure</u> . However, it is also important to ensure that new <u>communications and smart infrastructure integrates well into the area and has a satisfactory appearance</u> , and does not have a detrimental impact on the area within which it is proposed.
C219	Paragraph 7.6	Minor	<b>Becomes paragraph 8.16</b> The Legacy Corporation will require that new infrastructure is located as far as possible on existing buildings and structures to minimise the proliferation of stand-alone <u>telecommunications structures</u> which could have a detrimental impact on the area. Where the policy requires a mitigation plan for new development to address potential effects on <del>telecommunications or broadcast communications networks services</del> , the scope of this, including any assessment methodology, should be agreed in advance with the Local Planning Authority. <u>New development should, as far as possible, support innovation and enable communications networks and future infrastructure.</u>
C220	IN2. Planning for waste	Minor	<b>Becomes Policy S.7: Planning for waste</b> In carrying out its function as a Local Planning Authority, the Legacy Corporation will cooperate with the four Boroughs in matters of strategic waste management and planning. In doing so and in making planning decisions, it will take full account of: The waste apportionment targets set for each Borough within the London Plan The adopted local waste plans or waste planning policy for that Borough The development of new or review of existing adopted waste plans for that Borough. Proposals that would result in the loss of an existing waste management facility would only be permitted where it can be demonstrated that: An additional waste management facility has been secured, and is deliverable, which will meet the maximum waste throughput of that existing site, or An existing site can provide an additional capacity equivalent to that maximum waste throughput, and The new site can serve the same waste management needs of the original site, and The new site is <u>located within London and continues to meet London's strategic need in the same waste authority area or waste authority group area as the original site.</u>

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			<p>Proposals for new waste management facilities will be permitted where:  It is located within an area designated as Strategic Industrial Land (SIL) <del>which has been identified as a Preferred Industrial Location (PIL), or where appropriate within an Industrial Business Park (IBP)</del> or a Locally Significant Industrial Site (LSIS)  The proposal does not compromise or otherwise make unviable the existing adjacent employment or transport functions  Its design and operation will not adversely affect the wider amenity of the proposed location  It can be demonstrated to have met the tests within the Appendix B of the (draft) National Planning Policy: Planning for Sustainable Waste Uses.  <u>Cross-reference to policies: B.1; S.8. ELWA Boroughs Joint Waste Development Plan Document (2012); North London Waste Plan London Plan policies: SI7; SI8; SI9</u></p>
	Paragraph 7.7	No change	<b>Becomes paragraph 8.17</b>
C221	Paragraph 7.8	Minor	<p><b>Becomes paragraph 8.18</b>  The Legacy Corporation is the waste planning authority for its area by virtue of its role as a planning authority. The Four Boroughs have responsibility for waste planning within the remainder of their area. Each borough has, or will have within the lifetime of this Local Plan, an adopted waste plan or waste planning policies. The adopted East London Waste Plan includes and has effect within the Newham part of the Legacy Corporation area. <del>Tower Hamlets is its own waste authority and relevant policies within the Tower Hamlets Core Strategy (2010) will remain relevant</del>  In each case it will be necessary for the Legacy Corporation to cooperate and work closely with each Borough where adopted plans and policy are reviewed or specific proposals that affect waste management or waste sites arise. The Boroughs of Hackney and Waltham Forest each belong to the North London Waste Planning group which is in the early stages of preparing its Waste Local Plan. The Legacy Corporation will work closely with these two Boroughs, the North London Boroughs and other key stakeholders to make sure that the North London Waste Plan continues to take account of any waste capacity, sites and related evidence within that part of the Legacy Corporation area. <u>The Legacy Corporation will also work with the Borough and relevant authorities in relation to waste arrangements in new development to ensure that</u></p>

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			<u>these are efficient, well designed and appropriate, where appropriate through encouraging consideration of innovative solutions such as vacuum systems and compactors on site.</u>
	Paragraph 7.9	Reference update	<b>Becomes paragraph 8.19</b> The <u>Draft New</u> London Plan identifies waste apportionment targets that each Borough should meet for its area. The <u>Draft New</u> London Plan does not include a waste apportionment target for the Legacy Corporation area. However, the Legacy Corporation will cooperate with the four boroughs, the GLA and TfL in seeking to meet the borough apportionment targets and strategy for waste. When determining planning applications, these targets will remain the appropriate policy context against which to judge the acceptability of proposals that have an effect on any existing management site or operation, including proposals for new or expanded facilities.
C222	Paragraph 7.10	Minor	<b>Becomes paragraph 8.20</b> With existing waste management facilities located within the area, the policy identifies the criteria that would be necessary for proposals to meet if they would result in the loss of an existing facility, in order for them to be acceptable in terms of the effect on the waste apportionment targets set for each Borough and in order to meet the <u>requirement of London Plan Policy 5.17 Waste Capacity requirements set out in policies in Chapter 9 of the Draft New London Plan.</u>
C223	Paragraph 7.11	Minor	<b>Becomes paragraph 8.21</b> For proposals on undesignated (windfall) sites, Strategic <del>Preferred</del> Industrial Locations ( <u>SIL</u> ) are the locations within which new waste management facilities would be considered as acceptable, provided proposals meet the acceptability criteria in the policy. In the Legacy Corporation area, these are Fish Island South and Bow Goods Yard (see Policy B.1). Proposals may also be considered acceptable within <del>Industrial Business Parks (IBP)</del> or Locally Significant Industrial Sites (LSIS) where it is possible to demonstrate clearly that there would not be an adverse effect on the surrounding uses or area.
C224	S.6: Waste reduction	Minor	<b>Becomes Policy S.8: Waste reduction</b> The Legacy Corporation will, in making planning decisions, require that new development proposals contribute to the reduction of waste during construction and once operational, by minimising

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			<p>the amount of waste produced and maximising reuse, recycling and composting <u>and promoting a more circular economy</u>.</p> <p>Proposals for new development should demonstrate how they have adopted the Waste Hierarchy in their design and how they will enable their residents to minimise waste and maximise both reuse and recycling. Development proposals should demonstrate how they have: designed out waste through lean design, maximised the reused and recycled content within the materials used for construction, minimised the production of excess or waste material during construction and maximised the opportunities for reuse or recycling of materials remaining from construction. Excavated materials should, where practical, be retained and reused on site. Planning applications for major development schemes should include a statement within the Design and Access Statement that sets out how the scheme will comply with the requirements of this policy.</p> <p>Proposals for all development will, where relevant, be required to demonstrate that adequate provision has been made for domestic and commercial waste storage and for collection that allows for a range of future collection options which include separate collection of general waste, recyclable materials and other waste streams.</p> <p><u>Cross-reference to policies: SP.4; S.4; S.7</u> <u>London Plan policies: SI7; SI8; SI9</u></p>
	Paragraph 8.15	No change	<b>Becomes paragraph 8.22</b>
	Paragraph 8.16	No change	<b>Becomes paragraph 8.23</b>
C225	S.7: Overheating and urban greening	Minor	<p><b>Policy S.9: Overheating and urban greening</b></p> <p>Proposals for new development should ensure that buildings and spaces are designed to avoid overheating and excessive heat generation internally and externally, while minimising the need for internal air conditioning systems, taking into account <u>Draft New London Plan Policy SI4 and the Mayor's zero carbon target of 2050</u> <del>the guidance within the Mayor of London's Climate Change and Adaptation Strategy.</del></p> <p>Outside the existing parks and open spaces within the Legacy Corporation area, opportunities to introduce planting of trees in private and public spaces, including streets, along with those for including green roofs, green walls and other planting opportunities, should be taken to maximise</p>

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			<p>the contribution that urban greening can make in creating a liveable environment and maximising local biodiversity and encouraging local food growing.</p> <p>Planning applications for major development schemes should set out within the Design and Access Statement the measures included to avoid overheating (including overheating analysis against a mid-range climate scenario for the 2030s) and excessive heat generation and, where appropriate, to maximise urban greening.</p> <p><u>Cross-reference to policies: BN.3; BN.8; S.1; S.4</u> <u>London Plan policies: D2; S14</u></p>
	Paragraph 8.17	No change	<b>Becomes paragraph 8.24</b>
C226	Paragraph 8.18	Minor	<p><b>Becomes paragraph 8.25</b></p> <p>All development proposals should consider the opportunities to avoid overheating within buildings and also introduce additional greening to the site environment. Where feasible, and not in conflict with achieving high levels of building fabric efficiency, passive ventilation should be favoured. Applications for major development schemes will be expected to demonstrate that these issues have been addressed within the scheme design. This policy should be read alongside <u>Draft New London Plan Policy 5.9 Overheating and Cooling Policy S14 Managing heat risk</u>, in particular taking into account the cooling hierarchy:</p> <ol style="list-style-type: none"> <li>1. Minimise internal heat generation</li> <li>2. Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls</li> <li>3. Manage the heat within the building through exposed internal thermal mass and high ceilings</li> <li>4. Passive ventilation</li> <li>5. <u>Providing mechanical ventilation</u></li> <li>6. Active cooling systems (assuming that they are the lowest carbon option).</li> </ol>
C227	S.8: Flood risk and sustainable drainage measures (first part)	Minor	<p><b>Becomes Policy S.10: Flood risk</b></p> <p>The Legacy Corporation will take into account the most up-to-date flood risk information when carrying out its relevant functions and seek to reduce risk to life and property in doing so. Where development is proposed within Flood Zones 2 or 3 and is outside a Site Allocation within this Local Plan, planning applications should be accompanied by evidence that the proposed development is capable of meeting the Sequential</p>

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			<p>Test and, where appropriate, that the Exceptions Test as defined within the National Planning Policy Framework has been applied to demonstrate that no alternative location for the proposed development is available.</p> <p>Where no alternative location is available, a flood risk assessment should be submitted demonstrating that the proposal does not increase flood risk to third parties and, wherever possible, reduces flood risk. A site specific flood risk assessment may be required within Local Flood Risk Zones identified in Surface Water Management Plans (subject to location and degree of flood hazard) to ensure that the development will remain safe and will not increase flood risk to others. Where deemed necessary, the development proposals must be supported by a detailed integrated hydraulic modelling within the Flood Risk Assessment.</p> <p>Development proposals must be designed to reduce vulnerability to climate change, apply the sequential approach on site, be flood resilient and resistant, setting living accommodation finished floor levels 300mm above the predicted flood level for the 1 in 100 chance in any year flood event including an allowance for climate change, and must provide an appropriate means of escape to a higher level within the building or a safe route to a location above the predicted flood level. No basement development will be permitted within Flood Zones 2 or 3.</p> <p><u>Cross-reference to policies: BN.2; T.10; S.4</u> <u>London Plan policies: SI12</u></p>
C228	S.8 Flood Risk and Sustainable drainage measures (second part)	Major	<p>(New policy with wording split from previous Policy S.8)</p> <p><b><u>Policy S.11: Sustainable drainage measures and flood protections</u></b></p> <p>The rate of surface water run-off from development sites should be restricted to no greater than the equivalent for a Green Field site of an equivalent for a Green Field site of an equivalent size.</p> <p><u>It should be managed as close to its source as possible in line with the drainage hierarchy set out in policy SI143 of the Draft New London Plan.</u></p> <p>Using sustainable drainage techniques as a first choice and only using other methods of flow restriction where it can be shown that sustainable drainage methods are not feasible in that location, particularly in areas where a localised surface</p>

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			<p>water drainage problem has been identified within a Surface Water Management Plan (including potential flooding from sewers). <u>The Legacy Corporation will support developments which do not include proposals for impermeable paving.</u> Sustainable drainage systems that have benefits for water quality and storage, <u>efficiency</u>, habitat and landscapes and <u>amenity and recreation</u> should be fully considered before other options. All drainage systems discharging to a watercourse must include appropriate anti-pollution measures that can be easily accessed and maintained.</p> <p>Development proposals that create an obstruction within a watercourse or obstruct existing flood flow paths across land which cannot be mitigated through compensatory works or provision of additional flood storage capacity will not be permitted. The design and layout of proposed development should incorporate appropriate buffer strips adjacent to watercourses to allow access for flood risk maintenance and biodiversity and adequate space for sustainable drainage techniques.</p> <p>Where development is proposed on a site that includes an existing flood defence structure, development proposals should be designed to maintain the integrity of existing structure. Where the need for new or improved flood defences have been identified, relevant planning applications should demonstrate that allowance has been made for the relevant works to take place, including sufficient access for construction. Where a development proposal is dependent on the provision, improvement or repair of a river wall or other flood defence structure, these works should be included within the development applied for within the planning application.</p> <p><u>Cross-reference to policies: BN.2; T.10; S.4</u> <u>London Plan policies: SI13</u></p>
	Paragraph 8.19	No change	<b>Becomes paragraph 8.26</b>
	Paragraph 8.20	No change	<b>Becomes paragraph 8.27</b>
	Paragraph 8.21	No change	<b>Becomes paragraph 8.28</b>
C229	Paragraph 8.22	Minor	<b>Becomes paragraph 8.29</b> The Flood and Water Management Act 2010 makes each of the four Boroughs the Lead Local Flood Authority within their area. This includes a duty on each Borough to develop, maintain, apply



Change Reference Number		Type of change	Proposed change
			<p>and monitor a strategy for local flood-risk management in its area. Where these strategies have been prepared, these or any related Preliminary Flood Risk Assessment will need to be taken into account in carrying out any site-specific flood risk assessment. <del>Under the terms of the Act, each Borough will also become a SuDS (Sustainable Urban Drainage Systems) Approval Body.</del> Formal approval will be required for new drainage systems for new and redeveloped sites and highways. This will be a separate consent regime. However, even where planning permission is in place, the formal consent of the SuDS Approval Body will be required before development can commence. Once in place, the compliance with the National Standards for Sustainable Drainage will be required. Any interim or final SuDS and SuDS Approval Body guidance published by each Borough will also need to be taken into account in designing drainage and seeking this consent. A potential change to national planning policy could result in a move away from the proposed SUDs Approval Body approach to one which relies on securing approval through the existing planning or other processes. If introduced in the form envisaged, proposals for major development will be required to demonstrate that SUDs have been considered as a first option and that the options chosen are accepted as correct through consultation with relevant bodies. Long-term management and maintenance would also need to be secured. Proposals would also need to accord with the National Standards and Specified Criteria for Sustainable Drainage.</p>
C230	New Policy	Major	<p><b><u>Policy S.12: Resilience, safety and security</u></b></p> <p><u>The Legacy Corporation works with a range of development partners and stakeholders in order to ensure and maintain a safe and secure environment within the area, that is resilient against emergencies and threats such as fire, flood and terrorism. Part of this includes working closely with agencies such as the Metropolitan Police Service and the London Fire and Emergency Planning Authority to identify relevant needs, policies and other necessary infrastructure required to maintain a safe and secure environment. To continue maintaining this environment it is key that:</u></p>

Change Reference Number		Type of change	Proposed change
			<p><u>Development proposals should maximise building resilience and minimise potential physical risks through good design, use of the building regulations, Draft New London Plan policies and policies within this Local Plan, such as S.10 and S.11 in relation to flood risk</u></p> <p><u>New development should consider measures at the start of the design process which aim to design out crime and deter terrorism, assist in the detection of terrorist activity and help mitigate its effects</u></p> <p><u>Where required, physical security and safety measures should support and enhance the Healthy Streets vision and create spaces that people can enjoy, where they feel safe and relaxed and encouraged to choose to walk, cycle or use public transport.</u></p> <p><u>Cross-reference to policies: BN.4; BN.5; BN.6; BN.8; BN.11; BN.12; BN.14; S.1; S.2; S.3; S.4; S.5; S.6; S.7; S.8; S.9; S.10; S.11</u></p> <p><u>London Plan policies: GG5; D10; D11</u></p>
C231	New Paragraph	Major	<p><b>New Paragraph 8.30</b></p> <p><b><u>Reasoned Justification</u></b></p> <p><u>The Legacy Corporation's key aims around LIVE, WORK, VISIT and INSPIRE rely on the development of a safe and accessible built environment. The Draft New London Plan puts an increased emphasis on people feeling safe in their environment and includes policies in Chapter 3 around Safety, security and resilience. The Legacy Corporation area includes strategic infrastructure such as stations, key routes and iconic facilities in the Queen Elizabeth Olympic Park, as well as large leisure facilities including Westfield Stratford City. There are is also a rapidly increasing population, a range of businesses and new development in the area and events that generate large numbers of visitors. This policy therefore supports the Legacy Corporation in to deliver a safe, accessible and relaxed environment as supported by the Draft New London Plan.</u></p>
C232	New Paragraph	Major	<p><b>New Paragraph 8.31</b></p> <p><b><u>Policy Application</u></b></p> <p><u>The London Risk Register sets out hazards and threats across London and sets out controls in place in order to prepare for these, this is maintained and managed by the London Resilience Group and provides an evidence base for wider challenges that Planning Authorities in London</u></p>

Change Reference Number		Type of change	Proposed change
			<p><u>might face. This, combined with information around more localised needs, such as protective security relating to crowded spaces within the Legacy Corporation's area, where there are predictable and high levels of crowding. As well as information about schemes that have or will create a higher level of risk than existed previously, provides the background for the Legacy Corporation's approach to resilience, safety and security in the area.</u></p>
C233	New Paragraph	Major	<p><b><u>New Paragraph 8.32</u></b>  <u>The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisers) should be consulted to ensure that major developments in the Legacy Corporation area contain appropriate design solutions from the outset, which respond to the potential level of risk whilst maintaining high quality of place and reducing the need to retrofit solutions in future. Any proposed physical mitigations should give due regard to their impact on the design of the wider area and public realm and how they encourage walking and cycling and help reduce the dominance of motor vehicles. Where appropriate the Legacy Corporation may also consider protective security or safety measures at other major developments that are identified by the police at the time of the proposal being made are identified by the police as having a significant risk. These proposals and measures will be considered on a case by case basis.</u></p>