



Subject: Local Plan Consultation Document

Report No: Appendices to Agenda Item 9

Meeting date: 29th October 2013

Report to: Board of the London Legacy Development Corporation

FOR INFORMATION

This material will be considered in public

Appendix 1 – Draft Local Plan Consultation Document

Appendix 2 – Interim Consultation Report

Appendix 3 – Draft Summary for Consultation Leaflet

Appendix 4 – Non Technical Summary for Sustainability Appraisal of the Local Plan Consultation Document

Appendix 5 - Sustainability Appraisal of the Local Plan Consultation Document

Appendix 6 - Habitat Regulations Assessment Screening Report

Appendix 7 – Equalities Impact Assessment

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Appendix 1

Draft Local Plan Consultation Document

9th October 2013

Version Control

Version / revision	Date	Description of changes	Reviewed/edited by
1.0	09/10/13		Alex Savine

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Draft Local Plan Consultation Document

London Legacy Development Corporation Local Plan Interim Consultation Document/draft/vs0.1
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Introduction

In 2012, the Mayor of London established the London Legacy Development Corporation. The purpose of the Legacy Corporation is *“To promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”*.

As the Local Planning Authority for its area, the Legacy Corporation is required to prepare a Local Plan. The Local Plan sets out the Legacy Corporations strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies that applications for planning permission should conform to in order to meet these objectives.

This is a non-statutory stage of consultation on the draft Local Plan with this document setting out the form that the Legacy Corporation considers that the Plan should take and provides an opportunity for views to be expressed on the direction of the vision, objectives, policies and proposals before it is finalised for its 'Publication Stage'. Comments made at this stage will be taken into account as the plan is finalised for its 'Publication Stage'. This final version of the Local Plan will then be subject to its 'Publication Stage' consultation after which it will then be subject to an Examination into its soundness, held by an independent planning inspector.

This non-statutory stage of public consultation starts on **[date]** and ends on **[date]**. A consultation response form is available with this document to help you respond. Consultation responses should be sent to the following postal or email address no later than the end date of the consultation.

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The draft Local Plan and related material can be viewed on the Legacy Corporation website at <http://www.londonlegacy.co.uk/>

Paper copies of the consultation documents are available on request and can also be viewed at the Legacy Corporation office reception at the above address.

1. Spatial Portrait of the Legacy Corporation Area

The regional context – the strategic role of the Legacy Corporation Area within London

- 1.1. The Legacy Corporation area is located within east London, approximately 4 miles from the Central Activities Zone. It lies at a key strategic location with proposed connections to Europe via the Eurostar from Stratford International Station and Crossrail which will provide fast links across London and beyond once completed.
- 1.2. The Legacy Corporation area also sits at the meeting point of the London-Stansted-Cambridge-Peterborough growth corridor and the Thames Gateway Growth Corridor. Within London, the area is directly connected to the major business and growth hubs of Central London, Canary Wharf and the Royal Docks.
- 1.3. Identified by the Mayor as one of London's key future growth points, probably the most important for the next twenty five years, particularly within Policy 2.4 of the London Plan (The 2012 Games and their Legacy), the area in combination with much of its immediate surroundings, provides a significant land resource for meeting part of the need for housing and employment that will be generated by the projected growth of London within the Plan period. Falling also within the Lower Lea Valley Opportunity Area, the strategy for growth of the area within this Plan is therefore designed to meet the local need of those living within the area but also to develop a series of places that are part of their surroundings and provide opportunities for housing, employment, business and leisure for those living in the surrounding communities and more widely in the Growth Boroughs, while also providing a London-wide strategic resource within the context of the overall growth of London.

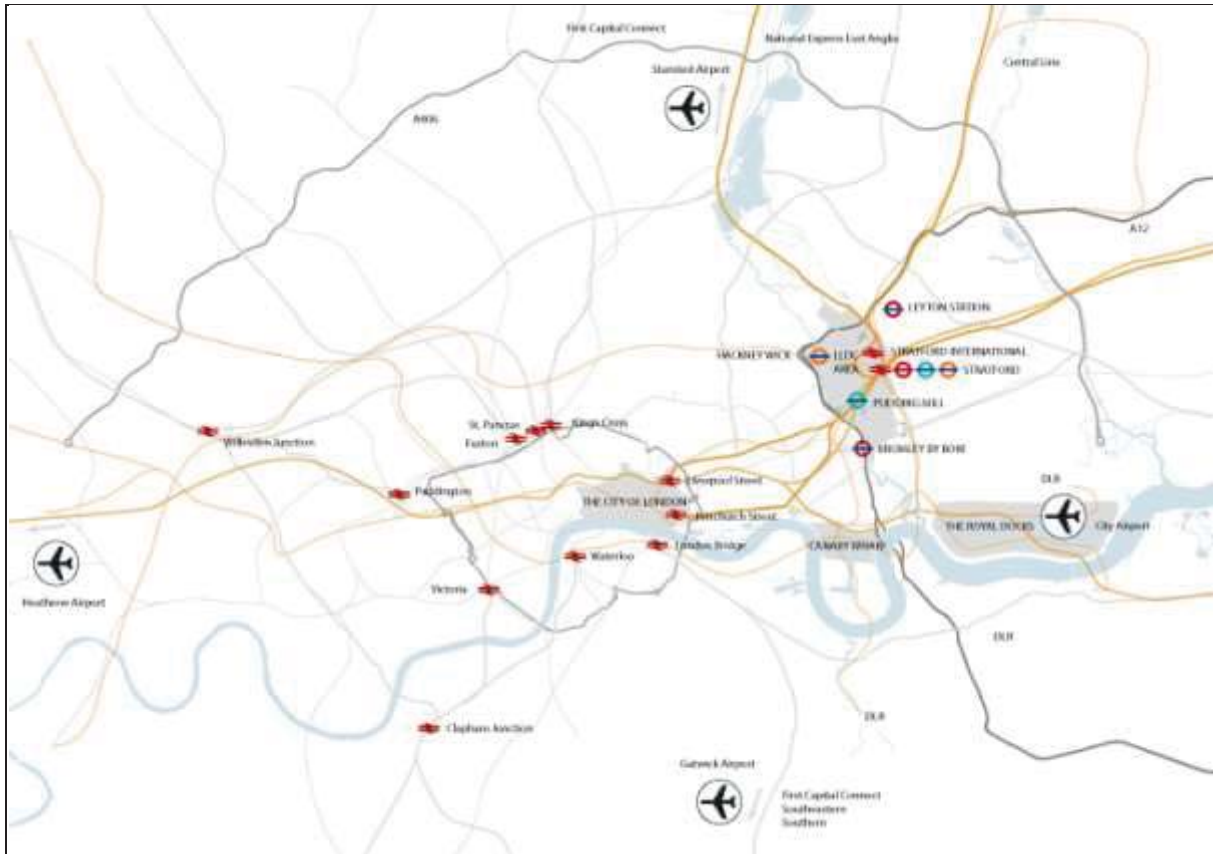


Figure 1.1 Key Diagram

- 1.4. The potential of the area to provide for identified needs goes beyond the development of land; the social, economic and environmental characteristics of the area mean that the Legacy Corporation's role is also to deliver wider benefits for the local area, London and beyond.
- 1.5. East London has some of the highest levels of deprivation in England. In 2010 the English Indices of Deprivation ranked Hackney as the most deprived Borough, followed by Newham and Tower Hamlets ranked second and third and Waltham Forest seventh¹. This provides a useful context to the area, demonstrating why the legacy of the Games in terms of improving the life chances of residents is key to the aims and remit of the London Legacy Development Corporation.
- 1.6. In order to address the issues faced by many living within the most deprived wards of the then Host Boroughs (now Growth Boroughs) the Government, the Mayor of London and the Boroughs in 2009 agreed a Strategic Regeneration Framework² (SRF) of public sector action to address the level of disadvantage evident in those communities in comparison to those living in London as a whole. It identified seven core themes:
 - Creating a coherent and high quality city within a world city region
 - Improving educational attainment, skills and raising aspirations.
 - Reducing worklessness, benefit dependency and child poverty.

¹ Department of Communities and Local Government, 2011- English Indices of Deprivation 2010

² Host Boroughs Strategic Regeneration Framework 2009 & Strategic Regeneration Framework Progress Report 2009-2011

- Homes for all.
- Enhancing health and wellbeing.
- Reducing serious crime rates and anti-social behaviour.
- Maximising sports legacy and increasing participation.

- 1.7. As shown in Chapter 2, underlying the SRF is the concept of 'Convergence' which is the ambition that over a twenty year period residents of the Host Boroughs would achieve the average expected in successful communities.
- 1.8. Each Legacy Corporation Borough has its own Sustainable Communities Strategy. However, for the purpose of this plan, the Strategic Regeneration Framework and its Convergence principle, as a jointly agreed framework, is considered to provide the most appropriate expression of the four sustainable community strategies.

The historical context to the area

- 1.9. With settlement in the area of Stratford dating back to Roman times, the Legacy Corporation area, like much of its wider surrounding land in the Lower Lea Valley was historically an area of marshland and farm land along the spine of the River Lea and its subsidiary channels. The Domesday survey of 1086 recorded eight tidal mills in this area, including Pudding Mill, City Mill, Waterworks Mill, Abbey Mill and Three Mills, names that are reflected in current location and waterway names in the area³. In 1135 William de Montfichet built a Cistercian abbey at Stratford Langthorne, with the Abbey subsequently owning a significant amount of land in the wider area.
- 1.10. The Lower Lea Valley, from the early development of industry associated with the mills in the Middle Ages, has continued to be a focus for development of industry and transport infrastructure through to the 20th Century, in particular providing a source of land for the location of industry to the east of London, firstly around the waterways, and then in the 19th Century linked to the development of the railways, with a significant railway hub at Stratford. In Hackney Wick and Fish Island, the growth of industry was intermingled with the building of back-to-back terraces of housing for workers and their families.
- 1.11. Significant change occurred in the second half of the Twentieth Century, with development of post-war housing estates and clearance and redevelopment of bomb damaged areas following World War II, which particularly in Hackney Wick and Fish Island changed the character of the area to one of predominantly employment use, with a subsequent decline in the density and type of employment.
- 1.12. The changes to the area in the latter part of the 20th Century resulted in environmental degradation and under utilisation of employment land, along with the focus here and in the surrounding administrative areas of some of the most deprived wards within the UK. As a result, the area became a focus of plans for regeneration designed to stimulate change and improvement, linked to an opportunity to provide significant new development to help accommodate London's increasing population and economy.

Recent history and future opportunities

- 1.13. The first significant stimulus for change came with the decision to route the second phase of the Channel Tunnel Rail Link through east London to St. Pancras, with an

³ Source: Three Mills Conservation Area, Character Area Appraisal, London Borough of Newham, 2006
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international station at Stratford. This was accompanied by the development of plans to promote major development around the station within the area taken by the mainly defunct Stratford Rail Lands, which resulted in planning permission being granted for a large retail and commercial led development, extending Stratford town centre, a significant number of new homes in what is now East Village, Westfield Stratford City and the planned International Quarter. While the majority of the retail and leisure development has now been built out, a significant amount of office and residential floor space remains to be built.

- 1.14. Also in 2005 London won its bid to host the 2012 Olympic and Paralympic Games based on the development of an Olympic Park within the core part of the Legacy Corporation area, including the principle of establishing a permanent legacy of development and regeneration, with new homes, community facilities and employment opportunities developed around the permanent Games time venues and parklands.
- 1.15. The intertwining of the Stratford City and Olympic projects has resulted in the delivery of the Queen Elizabeth Park with its permanent parklands and event spaces around the permanent venues of the Stadium, Aquatics Centre, Copper Box and Velodrome, with the iCity employment and education campus at Hackney Wick and the first phases of East Village homes occupied following their initial use as the 2012 Athletes Village, along with the opening of the all-age Chobham Academy school and the medical facilities at the Sir Ludwig Guttman Health & Wellbeing Centre. Outline planning permissions for Stratford City and the Legacy Corporations Legacy Communities Scheme permit the construction of floorspace that could result in, approximately a further 4000 and 6800 homes respectively, along with a range of other uses and supporting infrastructure.
- 1.16. Surrounding the Queen Elizabeth Olympic Park and Stratford City, the established areas of Hackney Wick and Fish Island and areas along Stratford High Street are interspersed with other significant opportunities for growth and development, including large opportunity sites at Sugar House Lane, Bromley by Bow and Chobham Farm which themselves have planning permission for significant amounts of development. The more established areas of Hackney Wick and Fish Island present a more complex urban environment with opportunities for new development and transition from more traditional employment uses in some locations, within a mix of heritage assets reflected in several conservation area designations and locally listed buildings.
- 1.17. This Local Plan builds on previous adopted borough Plans for their own parts of the Legacy Corporation area (as shown within Chapter 2) bringing these together to form a single cohesive plan for the development and change that is emerging within the area as a whole, set within the strategic context of the London Plan and the need to meet London's growth needs alongside local need and opportunities for delivering new homes and business and employment opportunities. The challenge will be to achieve this development and growth while integrating the new and existing communities physically and socially as each change and grow over time.

The Four Sub Areas

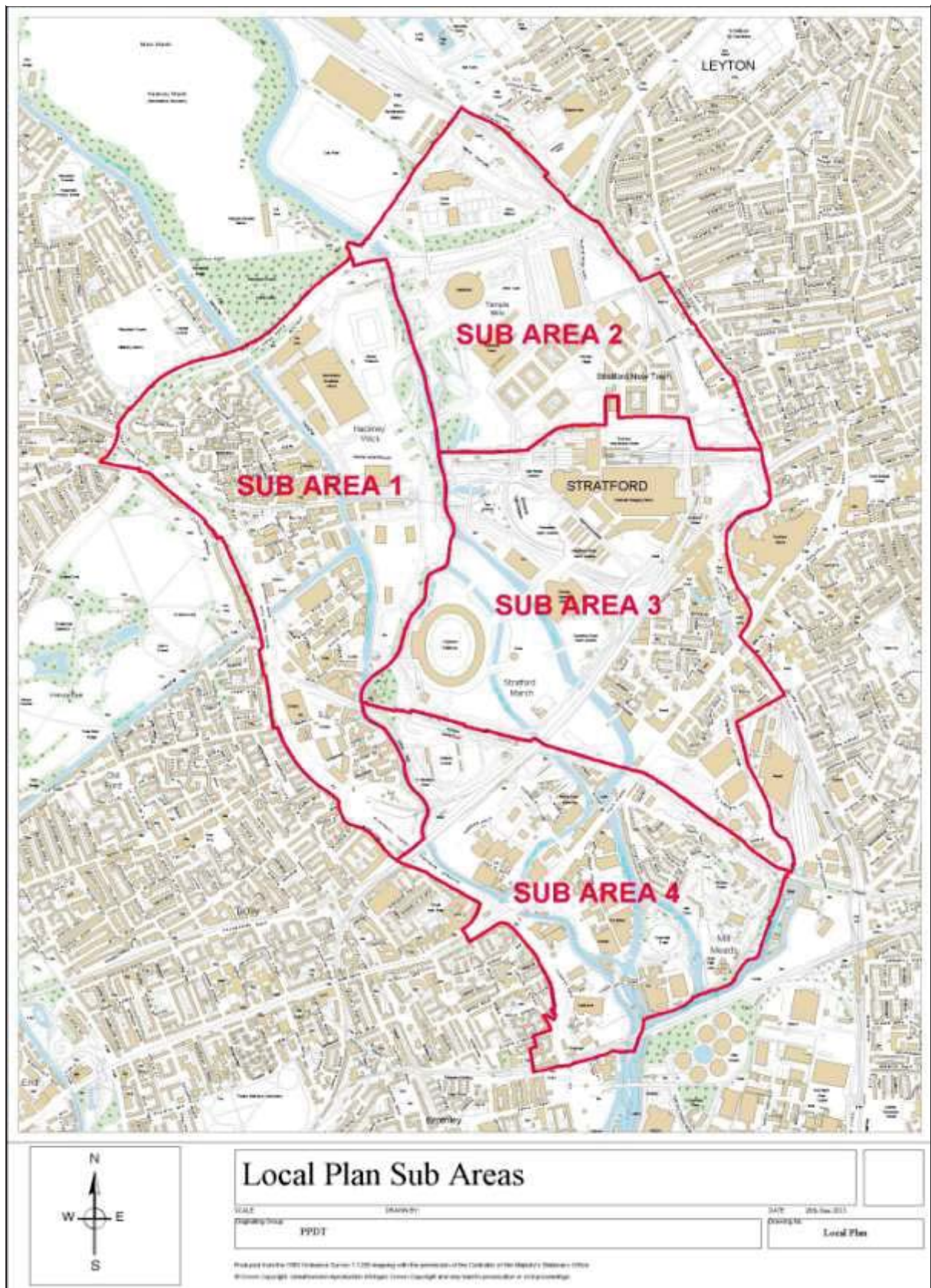
- 1.18. The Legacy Corporation area is well defined geographically but also comprises a series of different places with a variety of characters. It is bordered and divided by waterways, major roads and railway lines, presenting barriers to be overcome but which, at the same time, help to define those places and the way in which they might change and grow. While bringing areas within four boroughs together into one, the

Local Plan also sub-divides the area into four to aid the detailed description of the strategy, policies and proposals for these areas in sufficient detail. The four sub areas are:

- Sub Area 1 – Hackney Wick and Fish Island
- Sub Area 2 – North Stratford and Eton Manor
- Sub Area 3 - Central and South Stratford, and Queen Elizabeth Park South
- Sub Area 4 – Bromley-by-Bow, Three Mills and Pudding Mill

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Figure 1.2- Sub-Areas



Current profile of the Legacy Corporation

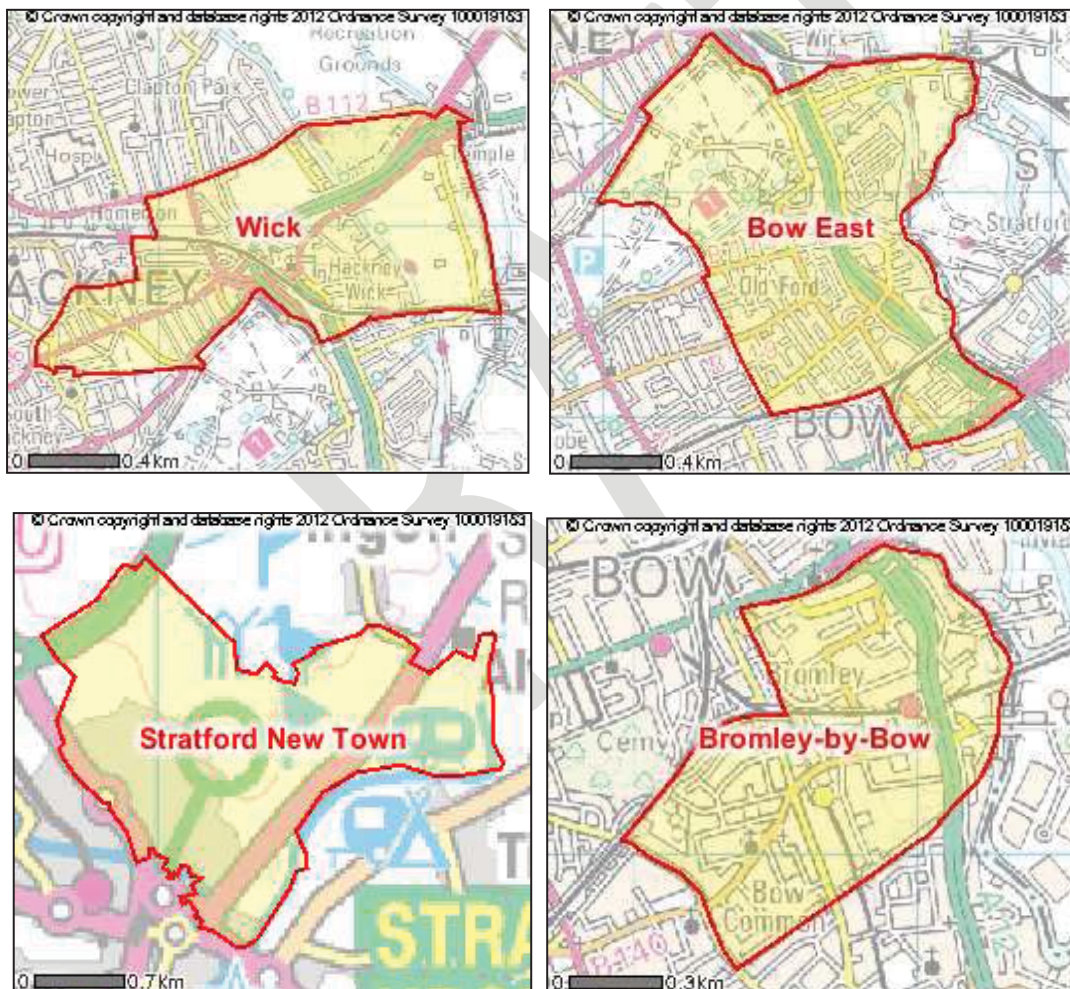
Geographical area

1.19. The Legacy Corporation area falls partly within the wards listed below. The characteristics of the population is essentially therefore drawn from these wards as a whole and from the data available from the 2011 Census.

1.20. The wards within which the Legacy Corporation area falls are as follows:

- London Borough of Hackney: Wick Ward
- London Borough of Newham: Stratford and New Town Ward
- London Borough of Tower Hamlets: Bow East and Bromley-by-Bow wards
- London Borough of Waltham Forest: Cathall and Leyton wards

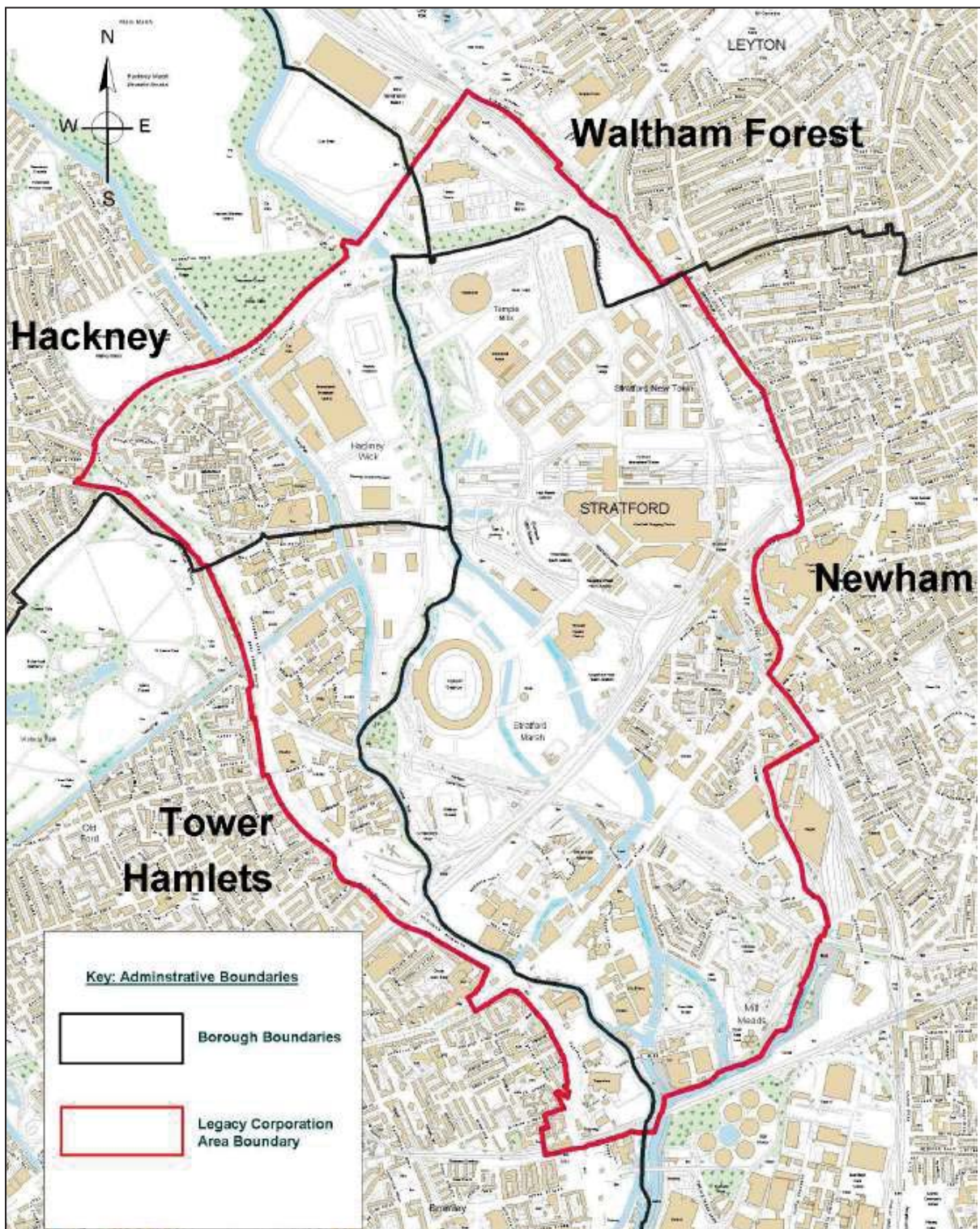
Figure 1.3- Ward maps





- 1.21. The area has an existing population of approximately 10,000, with concentrations of established and new housing in Hackney Wick and areas around and along Stratford High Street. The age profile of the current population is set out in Figure 1.5. As these existing communities are essentially a part of the wider wards identified above it is also useful to consider the profile of the population at a ward level, providing a wider context for the Legacy Corporation area.

Figure 1.4- Map showing administrative boundaries



Environment and built form

- 1.22. The Legacy Corporation's area is diverse in environmental terms with high density housing, retail and industrial development sitting alongside large expanses of open space, playspace, sports facilities, waterways and infrastructure. Much of the area is designated Metropolitan Open Land, also contributing to the green infrastructure and biodiversity value of the area. Waterways across the area contribute to the Blue and

Green Grids whilst flood patterns provide opportunities and some constraints on development.

- 1.23. Much of the Legacy Corporation’s area bears the legacy of the 2012 Olympic and Paralympic Games in terms of the footprint of the park with high-quality sports facilities, events and community space. The Queen Elizabeth Olympic Park contains large scale and high profile sports, community and leisure developments of the Olympics Stadium, Aquatics Centre, Velopark, Copper Box Arena and parkland alongside, alongside playspace, transport infrastructure, footpaths, cycle routes and other, smaller scale community and visitor attractions. It is a tourist and visitor destination in its own right, as well as being one of the main draws for population and economic activities for the Legacy Corporation area and East London beyond.
- 1.24. However, the Legacy Corporation’s area also covers existing communities of Hackney Wick, Bromley-By-Bow and Stratford which together with major retail destinations, employment hubs, industrial land and associated infrastructure provide a diverse environmental, social and economic profile. Conservation Areas and heritage assets also contribute to a shared sense of local identity.

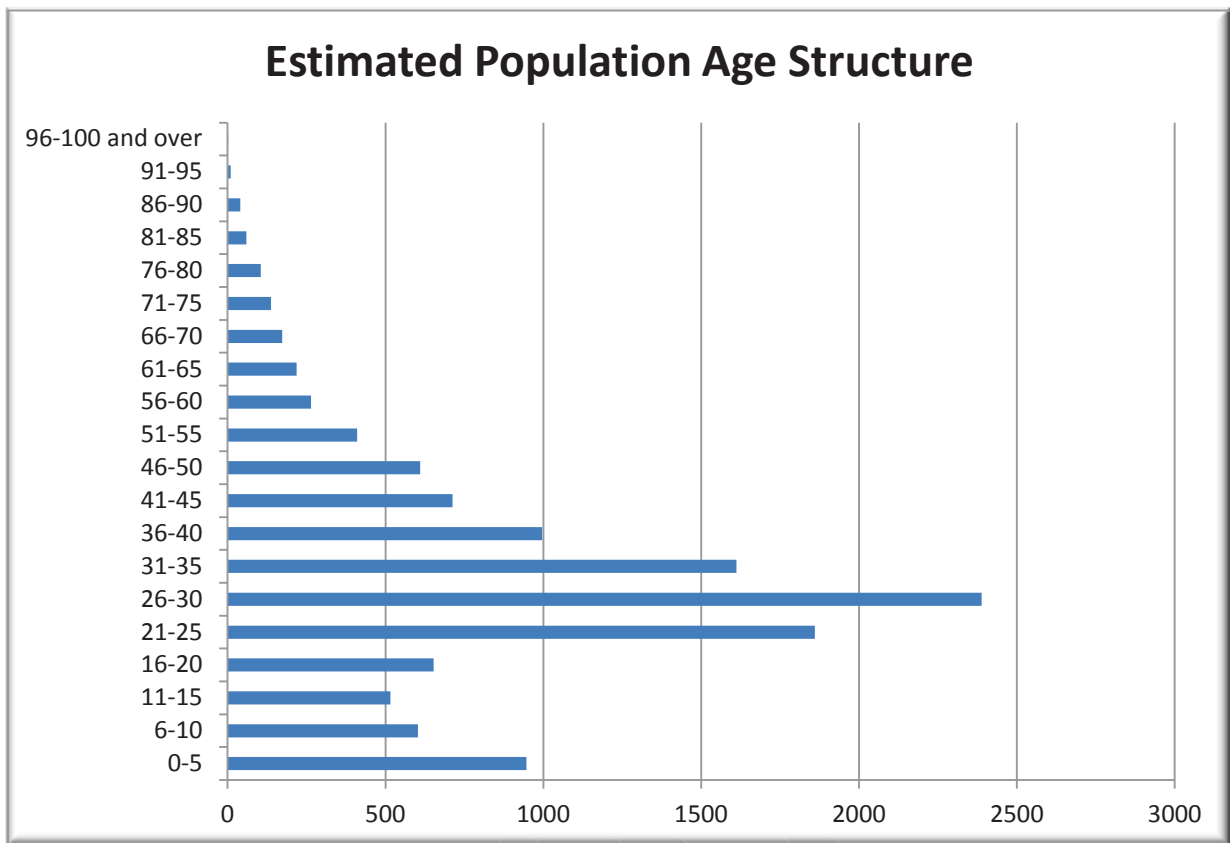
Demographics

Table 1- Current Population Estimates

Usual Residents	Females	Males	Number of Occupied Households
10,273	4,822	5,451	4,533

Source: ONS 2011 Census Data

Figure 1.5- Current Legacy Corporation Area Estimated Population Structure



Source: ONS 2011 Census Data

Table 2- Legacy Corporation Area Wards Population and Age Structure

Age Structure within wards, the four Boroughs and London (Count and %) (Source: ONS Census Data 2011)												
Age (years)	Hackney		Newham		Tower Hamlets				Waltham Forest			
	Wick Ward Count	Wick Ward %	Stratford & New Town Count	Stratford & New Town %	Bromley by Bow Count	Bromley by Bow %	Bow East Count	Bow East %	Cathall Count	Cathall %	Leyton Count	Leyton %
0 to 4	904	7.7	1066	6	1365	9.4	1002	6.8	987	7.8	1271	9
5 to 7	494	4.2	500	2.8	777	5.4	471	3.2	567	4.5	620	4.4
8 to 9	318	2.7	291	1.6	464	3.2	301	2	304	2.4	366	2.6
10 to 14	745	6.3	749	4.2	1062	7.3	685	4.6	697	5.5	970	6.8
15	158	1.3	140	0.8	203	1.4	122	0.8	158	1.2	217	1.5
16 to 17	270	2.3	302	1.7	402	2.8	250	1.7	257	2	342	2.4
18 to 19	325	2.8	426	2.4	409	2.8	309	2.1	315	2.5	338	2.4
20 to 24	1046	8.9	2519	14.2	1633	11.3	1800	12.2	1330	10.5	1299	9.2
25 to 29	1371	11.7	3385	19.1	1813	12.5	2550	17.3	1737	13.7	1669	11.8
30 to 44	3021	25.7	4835	27.2	3595	24.8	4029	27.3	3217	25.3	3471	24.5
45 to 59	1820	15.5	2166	12.2	1630	11.3	1789	12.1	1814	14.3	2144	15.1
60 to 64	339	2.9	400	2.3	294	2	386	2.6	450	3.5	428	3
65 to 74	500	4.3	554	3.1	441	3	526	3.6	508	4	620	4.4
75 to 84	322	2.7	310	1.7	296	2	426	2.9	288	2.3	328	2.3
85 to 89	76	0.6	84	0.5	65	0.4	96	0.6	54	0.4	64	0.5
90 and Over	25	0.2	41	0.2	31	0.2	39	0.3	17	0.1	37	0.3
TOTAL	11734	100	17768	100	14480	10	14781	12700	14184	100	14184	100
Mean Age	32.6		31.5		29		32.2		32		31.8	
Median Age	30		29		27		29		29		30	

1.25. With the relatively small nature of the Legacy Corporation area, and the fact that much of the area has little existing population it is more appropriate to look at the four borough context in drawing a picture of the current employment and business characteristics. This also reflects the context of the Convergence agenda within which this plan and the Legacy Corporation's purpose is set.

1.26. The following has been drawn from the 2011 Census data for each of the Wards, and in some cases for the four boroughs as a whole to provide a broad picture of the socio-economic setting within which the Legacy Corporation area sits. It provides a mixed picture, with some data, particularly for higher level educational attainment and the proportion of the population with higher levels of qualifications and skill being positive but with many indicators reinforcing the perception that a significant element of the population have greater difficulty obtaining employment, achieving basic levels of qualification and are more likely to suffer from poor health outcomes.

Employment

- 1.27. Table 3 provides information on occupation and unemployment levels for the wards that are partly within the Legacy Corporation area and for the Legacy Corporation area as a whole, demonstrating that these wards have lower levels of economic activity than London as a whole and have higher levels of unemployment than the relevant borough and London as a whole. Table 4 provides a picture of the overall economic activity within the populations of the four boroughs, which shows a lower level of employment and economic activity over all within the four boroughs when compared to London and the UK as a whole.

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Table 3- Economic Activity

Economic Activity Levels within wards, the four Boroughs and London (Source: ONS Census Data 2011)											
Economic Activity (%)	Hackney		Newham		Tower Hamlets			Waltham Forest			London
	Wick Ward	Borough	Stratford & New Town	Borough	Bromley by Bow	Bow East	Borough	Cathall	Leyton	Borough	
Economically Active; Employee; Part-Time	10.5	11.4	9.7	11.5	12.6	8.9	9.6	10.4	11.5	11.5	10.9
Economically Active; Employee; Full-Time	34.1	36.6	41.1	30.9	29.9	45.5	39.7	32.2	31.9	36.3	39.8
Economically Active; Self-Employed	10.3	12.4	10.4	9.5	6.2	8.4	8.3	11.9	11.2	12.4	11.7
Economically Active; Unemployed	8.1	7	6.3	6.9	8.7	6.1	6.7	7.9	7.4	6.1	5.2
Economically Active; Full-Time Student	4.6	3.9	7.6	8.4	6.7	5	5.5	7.3	5.9	4.4	4.1
Economically Inactive; Retired	6.4	5.6	4.3	5.8	5	5.5	4.7	6.4	6.9	8	8.4
Economically Inactive; Student (Including Full-Time Students)	9.4	8.8	10.3	10.9	10.4	7.3	9.9	8.9	8.8	8	7.8
Economically Inactive; Looking After Home or Family	5.4	4.9	3.9	7.2	10	5.6	7	6.6	7.2	6	5.2
Economically Inactive; Long-Term Sick or Disabled	7.2	5.2	3.2	4.2	5.6	4.7	4.5	4.2	4.8	3.8	3.7
Economically Inactive; Other	4	4.1	3.1	4.7	4.8	3	4	4	4.4	3.6	3.2
Unemployed; Age 16 to 24	1.7	1.4	1.8	1.6	2.4	1.5	1.8	1.8	1.9	1.5	1.2
Unemployed; Age 50 to 74	1.3	1.1	0.8	0.9	0.9	0.8	0.9	1.3	1.1	0.9	0.9

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Unemployed; Never Worked	2.2	1.5	1.6	2	2.8	1.2	1.8	2	1.8	1.4	1.1
Long-Term Unemployed	3.3	2.9	2.3	2.5	3.3	2.3	2.5	2.9	2.8	2.3	2

Table 4- Labour supply activity

Four borough Labour Supply Activity (%)					
Locations/Area	Total Economically Active	Total in Employment	Employees	Self-Employed	Unemployed
LB Hackney	70.8	65.0	51.8	12.7	9.9
LB Newham	67.7	57.2	48.6	7.8	13.7
LB Tower Hamlets	71.3	62.0	51.9	9.3	12.5
LB Waltham Forest	76.4	69.8	54.4	14.7	10.8
Four Host Boroughs Total	71.5	63.4	51.9	11.1	11.7
London	75.5	68.6	56.3	11.9	8.9
Great Britain	76.7	70.5	60.5	9.6	7.9

(Source: ONS 2012)

Table 5- Industrial Activity

Industrial Activity within wards, the four Boroughs and London (Source: ONS Census Data 2011)											
Industrial Activity in the population (%)	Hackney		Newham		Tower Hamlets			Waltham Forest			London
	Wick Ward	Borough	Stratford & New Town	Borough	Bromley by Bow	Bow East	Borough	Cathall	Leyton	Borough	
Agriculture, Forestry and Fishing	0	0	0.1	0.1	0	0	0	0	0.1	0.1	0.1
Mining and Quarrying	0	0.1	0	0	0	0.1	0.1	0	0	0	0.1
Manufacturing	2.6	2.5	2.1	3	2.9	2.4	2.2	2.3	2.9	3.5	3.2
Electricity, Gas, Steam and Air Conditioning Supply	0.1	0.1	0.1	0.2	0.1	0.2	0.2	0	0.1	0.2	0.3
Water Supply; Sewerage, Waste Management and Remediation Activities	0.4	0.2	0.4	0.5	0.4	0.4	0.2	0.3	0.3	0.5	0.4
Construction	3.7	3.8	7.8	8.5	3.5	3.6	3.1	10.2	9.1	9.5	6.6
Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles	12	11.5	12.8	17.1	14.4	10.9	10.7	14.1	14.5	13.7	13.1
Transport and Storage	4.1	3.2	4.2	6	5.7	3.6	3.7	5.9	6	5.5	5
Accommodation and Food Service Activities	7.8	6.7	12.5	11.8	14.1	8.4	9.8	13	10.7	7.7	6.3
Information and Communication	8	9.5	6	4.2	5.6	8.3	8.1	4	4.2	4.8	6.9
Financial and Insurance Activities	3.9	4.9	8.6	5.1	6.8	9.3	15	3.6	3.8	4.7	7.7
Real Estate Activities	1.9	2.1	1.8	1.7	2	2	1.7	1.4	1.7	1.9	2
Professional, Scientific and	12.3	15	8	5.4	7.5	14.5	13.5	4.8	5.6	6.8	10.9

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Technical Activities											
Administrative and Support Service Activities	6.4	5.8	8.6	8.8	6.6	4.7	4.9	9	8	6.8	5.9
Public Administration and Defence; Compulsory Social Security	4.6	4	4.1	4.2	4.4	3.9	3.7	4.4	5.3	5.5	5
Education	11.5	11.4	8.1	8.5	9.7	10.4	9.1	8.6	10.1	11.2	9.6
Human Health and Social Work Activities	12.4	10.5	9.9	10.3	10	10.8	8.1	11.8	11.9	11.3	10.7
Other	8.4	8.6	5	4.7	6.1	6.5	6	6.4	5.6	6.3	6.4

Educational qualifications

1.28. Table 6 identifies the levels of qualification held by residents within the Legacy Corporation area wards are similar to, or in some cases above, the London-wide level for the highest levels of qualification. However, the number of those within these wards and the boroughs as a whole, who have no qualification is greater than that for London.

Table 6- Qualifications

Qualification Levels within wards and the four Boroughs (%)											
Highest Level of Qualification Achieved	Hackney		Newham		Tower Hamlets			Waltham Forest			London
	Wick Ward	Borough	Stratford & New Town	Borough	Bromley by Bow	Bow East	Borough	Cathall	Leyton	Borough	
No Qualification	22.8	19.6	13.9	20.6	20.5	21.4	20	19.3	21.1	20.8	17.6
NVQ1	10.8	9	8.9	11.4	12.1	8.5	9.3	11.5	12	12.3	11.8
NVQ2	11.5	10	9.5	11.2	11.1	9.1	8.7	12.3	12.7	12.7	12
NVQ3	10.4	9.3	10.9	9.9	11.4	10.5	10.1	9.9	9.9	10	10.5
NVQ4	34.4	41.8	40.6	30.1	27.9	42	41	28.6	28.5	30	37.7

(Source: ONS Census Data 2011)

Health

- 1.29. The 2011 Census data (Table 7) shows that while the number of people in the these wards and the boroughs as a whole who consider themselves to be in good health and not limited in their day to day activities, to be similar to London as a whole, significantly more consider that their day to day activities are limited a lot or suffer from bad or very bad health.
- 1.30. The statistics for the wards within which the LLDC area falls, which have be drawn from the 2011 Census, reinforce the need to pursue the objectives of the 'Convergence' agenda within this Plan and the wider strategies to which it relates. However, bearing in mind the projected future population growth within the area which is likely to result from the significant programmes of development within the Legacy Corporation area, this picture is likely to change over time and will require an on-going monitoring programme to measure the potential positive outcomes on health from the delivery of new and regenerated places.

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Table 7- Health

Health within Wards and the four Boroughs											
	Hackney		Newham		Tower Hamlets			Waltham Forest			London
	Wick Ward	Borough	Stratford and New	Borough	Bromley-by-Bow	Bow East Ward	Borough	Cathall Ward	Leyton Ward	Borough	
Day-to-Day Activities Limited a Lot	9.4	7.3	5.8	7	7.1	7.4	6.8	6.9	7	6.9	6.7
Day-to-Day Activities Limited a Little	7.9	7.2	5.8	6.9	7.2	7.4	6.7	7.1	7.2	7.6	7.4
Day-to-Day Activities Not Limited	82.8	85.5	88.4	86.1	85.6	85.2	86.5	86	85.8	85.4	85.8
Very Good Health	48.1	52.2	50.2	48.5	46.1	50.1	50.6	47	46.2	47.1	50.5
Good Health	32.2	30.7	35.4	34.6	34.6	32.5	32.7	35.8	35.9	35.6	33.3
Fair Health	12.8	10.9	9.7	11.3	12.5	11.1	10.7	11.8	12.2	12.1	11.2
Bad Health	5	4.5	3.4	4.1	4.9	4.5	4.4	3.9	4.3	3.9	3.7
Very Bad Health	2	1.7	1.3	1.5	1.9	1.8	1.6	1.4	1.5	1.3	1.2

(Source: ONS 2011 Census data)

- 1.31. The most recent ONS life expectancy data (2008-10) shows that of all the 404 local authorities in the United Kingdom, Newham has the highest worst ranking in terms of life expectancy for the four host boroughs at 335 with an average life expectancy of 81.0. All four host boroughs are below the London average of 83.3 in life expectancy terms. The UK average life expectancy is 82.3.

Table 8- Life expectancy (2008-2010)

Borough	Life Expectancy	Rank
Newham	81.0	335
Hackney	83.0	158
Tower Hamlets	81.4	305
Waltham Forest	81.9	271
London	83.3	

Future of the Legacy Corporation area - capacity for Growth and Development

- 1.32. The Legacy Corporation area has one of the most significant available development land resources within London. It has a total potential capacity for approximately 20,000 new homes and more than 930,000 sqm of commercial floorspace (Legacy Corporation Draft Infrastructure Delivery Plan Report, URS, 2013). Planning permissions have been granted for a significant proportion of this development capacity, in the region of 80%.
- 1.33. This plan builds on this approved capacity and assumes that this will be delivered, while providing sufficient flexibility for these proposals to vary should circumstances, including market conditions, change during the plan period to 2031. The remaining development capacity is derived from those sites which are known to be available for development and are considered to be deliverable within the plan period. Existing planning permissions also include a wider range of uses in particular locations, including hotel and student accommodation, leisure use floor space, open space, education and floorspace for health care and community facilities. These are described in more detail in the four sub-area sections of this plan.

The projected effects of growth

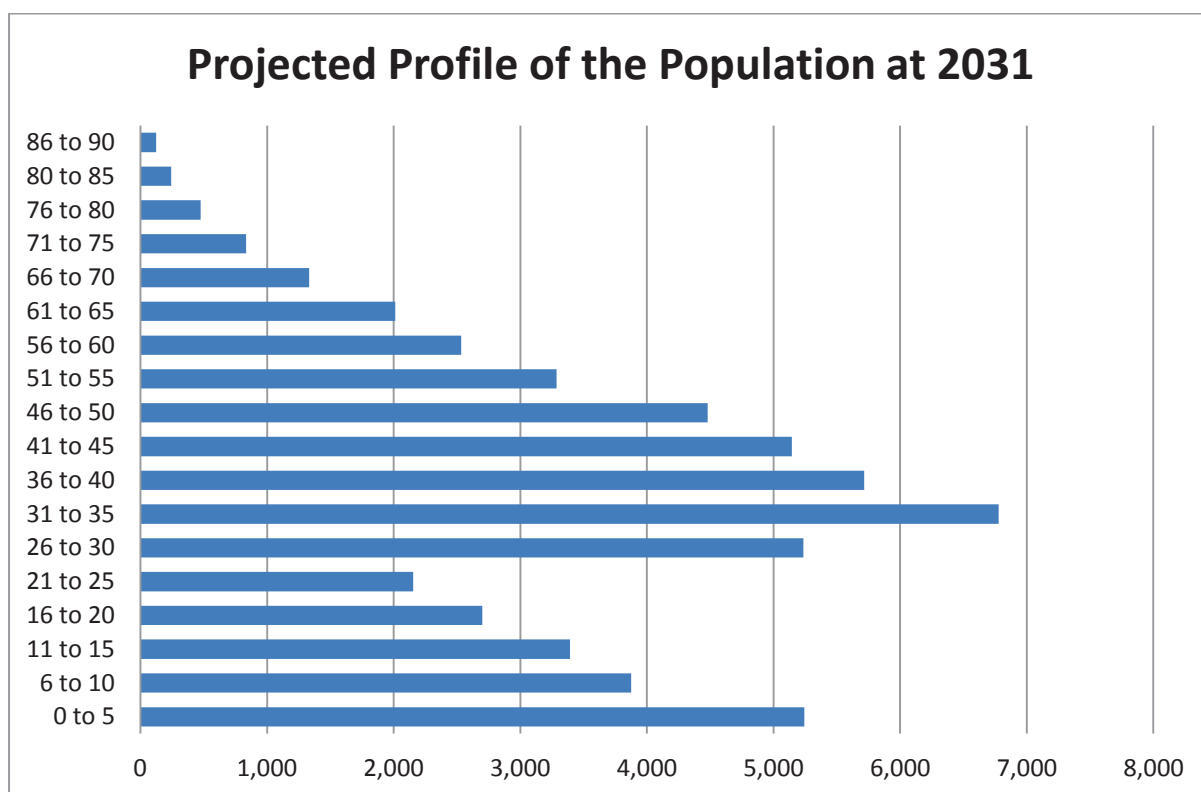
- 1.34. With the series of planned development projects across the area which have planning permission, alongside some smaller development opportunities, the Legacy Corporation area is forecast to undergo significant change over the lifetime of the Local Plan. The plan presumes that the amount of development that is projected will come forward in approximately the form that much of it is currently permitted. The area's population is therefore expected to increase rapidly over the plan period to 2031.
- 1.35. The Greater London Authority strategy-based population projections therefore estimate that, as a result of this level of development, the population of the LLDC area is likely to increase to around 55,000 by 2031. This is a significant increase which has been taken into account in developing the policies within this plan and in the development of the Legacy Corporation's Infrastructure Delivery Plan. After the plan period the population is expected to grow at a substantially reduced rate as a result of the likely level of potential development having been achieved.

Table 9- Population Projections to 2031

Year	Total
2011	10,274
2012	12,395
2013	14,030
2014	15,678
2015	17,325
2016	18,972
2017	22,323
2018	25,635
2019	28,951
2020	32,270
2021	35,592
2022	38,586
2023	41,590
2024	44,595
2025	47,602
2026	50,610
2027	51,563
2028	52,567
2029	53,567
2030	54,565
2031	55,561

- 1.36. It has also been possible to estimate the possible population profile of the area when the planned development has taken place at 2031. This shows that the population will still be relatively young but with a greater proportion of those over 35 than at present. This gradual change in profile has implications for the level, form and type of housing which will be required within the area.

Figure 1.6- Projected Population Profile



Source- Greater London Authority Population projections (September 2013)

Challenges

- 1.37. The housing needs of the existing population within the Legacy Corporation area have been fully considered as a part of the wider housing need identified by each of the four boroughs for their area. This takes into account the strategic nature and scale of the planned development and growth in the area, which will have a role in meeting housing need in east London and more widely for London as a whole. However, it has been necessary to review the housing needs evidence for each of the boroughs to a more finely grained detail. It has been concluded that there are high requirements for 1 and 2 bed dwellings in the market housing tenure, a general requirement for larger affordable housing units and a need for 1 bed affordable rented dwellings. In affordability terms, the requirement for affordable housing is significantly greater than planned delivery.
- 1.38. Other challenges for the Legacy Corporation include providing for business, employment and economic needs, the development of planned infrastructure to support growth, protecting the natural and built environment, creating good, inclusive design and creating thriving centres, building on the area’s appeal as a thriving sport and visitor recreation destination.
- 1.39. In terms of area-specific issues which face the Legacy Corporation, the expansion of Stratford as a Metropolitan Centre provides a great opportunity but also a challenge in terms of the need to create an expanded, but integrated centre without severance from the existing Stratford centre. Other key challenges include attracting investment to the employment hubs, local centres and Hackney Wick; maintaining and building upon the local character of each of the areas; and building upon opportunities for the enhancement of the cultural, leisure and sporting offer.

1.40. These challenges give rise to a number of opportunities to build upon the current strengths of the Legacy Corporation's area. These are shown spatially within this Plan for the following chapters: Business, Economy and Employment; Housing; and the Natural Environment.

References

- The London Plan
- Strategic Regeneration Framework
- Three Mills Conservation Area, Character Area Appraisal, London Borough of Newham, 2006
- Office for National Statistics Data
- 2011 Census Data
- Greater London Authority Population Projections (September 2013)

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2. The Policy Context

The Legacy Corporation and its Purpose

- 2.1. In April 2013 the Mayor Of London established his London Legacy Development Corporation, a Mayoral Development Corporation as defined in the Localism Act 2011. The purpose of the Legacy Corporation is set out in its establishment order and is:

“To promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”.

A Local Planning Authority and a Local Plan

- 2.2. On 1st October 2012, the Legacy Corporation became the Local Planning Authority for its administrative area, a role that had previously been divided between the four boroughs, the Olympic Delivery Authority and London Thames Gateway Development Corporation. It is now responsible for the determination of all applications for planning permission, listed building and conservation area consent. It also has the powers to declare new conservation areas and add buildings and structures to the Local List of buildings, structures or assets of historic or heritage interest.
- 2.3. The Legacy Corporation’s planning powers and responsibilities are primarily drawn from the following:
- Town and Country Planning Act 1990 (as amended)
 - Planning and Compulsory Purchase Act 2004 (as amended)
 - The Planning Act 2008 (as amended)
 - Town and Country Planning (Local Planning) (England) Regulations 2012
 - Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) and other statutory instruments made under Part III of the 1990 Act
 - London Legacy Development Corporation (Planning Functions) Order 2012
 - The Community Infrastructure Levy Regulations 2010 (as amended)
- 2.4. Uniquely, the Legacy Corporation has also been given the plan-making responsibilities for the area. Changes in legislation since the Coalition Government came into power in May 2010 now mean that local planning authorities can prepare a single Local Plan rather than a number of individual LDDs. The Legacy Corporation will be preparing a single Local Plan for its area. This will set out the planning strategy for the area over the plan period, means of meeting needs and requirements for various forms of development, setting out general development management policies under which day to day applications will be determined and most crucially it will also make site allocations to meet the growth agenda.
- 2.5. In time, once adopted, the strategy policies and proposals within the Local Plan will become the most important material consideration in determining planning

applications, replacing the adopted Local Plans that currently apply to the area. Until that point, the following adopted documents remain the relevant local planning policy for the purpose of determining planning applications which lie within each administrative area:

London Borough of Hackney Core Strategy (2010) sets out the over-arching planning policies for development falling within this area, but also identifies and provides high level policy for strategic sites including Hackney Wick within the Legacy Corporation's area.

London Borough of Hackney, Hackney Wick Area Action Plan (2012) provides further detail to the Core Strategy setting out detail for the redevelopment of the area including iCity, a focus for technology-based employment, a new neighbourhood hub and proposals to link both with existing neighbourhoods and the Queen Elizabeth Olympic Park.

London Borough of Newham Core Strategy (2012) contains the most-up-to-date planning policies for the Newham Borough as a whole, but also sets out some clear direction for the Legacy Corporation with regard to Stratford and its emergence as a Metropolitan Centre, Chobham Village, Carpenters District, Sugar House Lane and Three Mills, Pudding Mill Lane and what is termed the Olympic Quarter.

London Borough of Tower Hamlets Core Strategy (2010) This document provides strategic planning policies for the relevant area, but also specific policies for Fish Island and Bromley-By-Bow which fall within the Legacy Corporation's area.

London Borough of Tower Hamlets, Fish Island Area Action Plan (2012) This builds on work within the Core Strategy setting out how the area will develop. Key to this process is enhancing the connectivity of the area with communities beyond and the reuse and redevelopment of industrial premises for mixed uses occurring in a manner appropriate to the historical context.

London Borough of Waltham Forest Core Strategy (2012) sets out the planning policies for the Borough, including parts of Leyton which fall within the Legacy Corporation's area.

In addition to the above, while not a formal part of the Development Plan the Lee Valley Regional Park Authority Park Development Framework (2011) sets out the blueprint for the regional park, part of which falls within the Legacy Corporation area. Obligations are placed on planning authorities, including the Legacy Corporation, under the terms of the Lee Valley Regional Park Act (1996).

- 2.6. Figure 2.1 shows the chain of conformity of planning policy documents, upon the adoption of the Legacy Corporation's Local Plan.

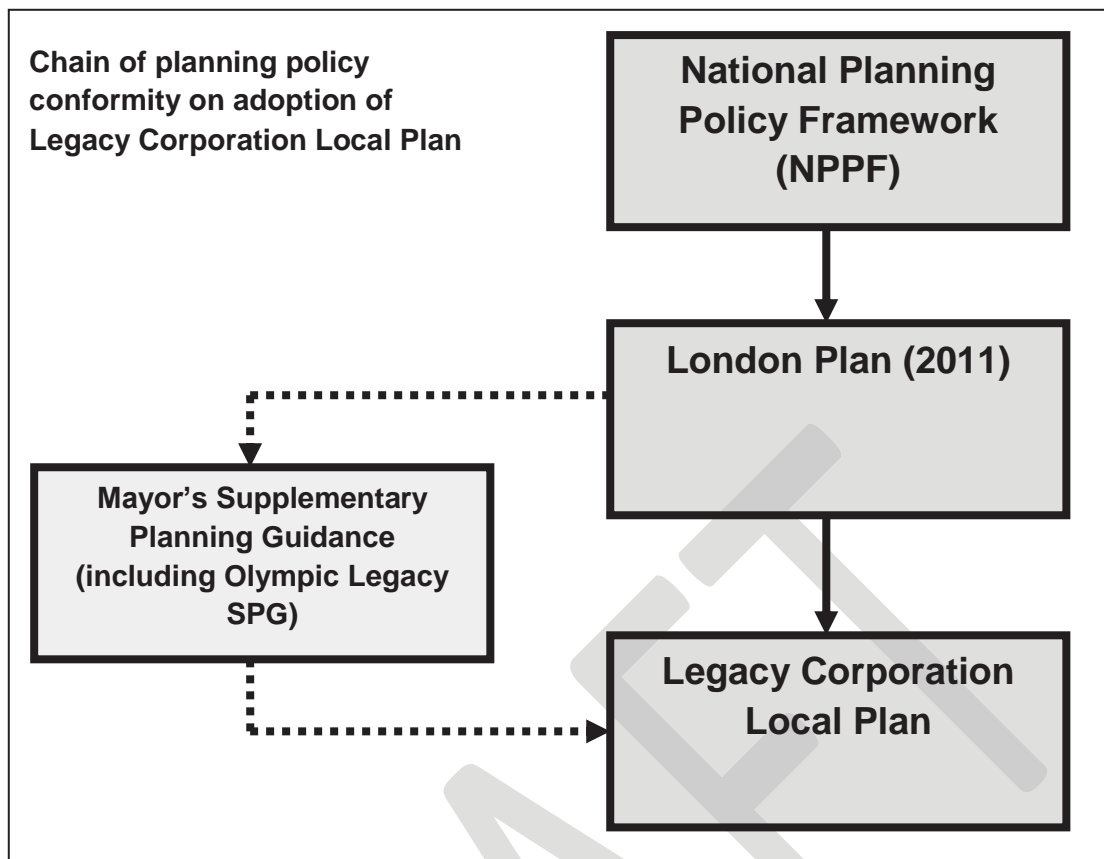


Figure 2.1- Chain of conformity

Building on the existing plans for the area

- 2.7. The Legacy Corporation Local Plan is being prepared in the light of these adopted plans that apply to its area and the associated masterplans and supplementary guidance that has been developed over-time in support of this. The Local Plan is not being developed from a “clean sheet” but builds on this substantial body of previous work. These and the associated evidence studies and reports that support them are being reviewed, and where necessary updated to ensure that the Legacy Corporation Local Plan is built upon the most up to date and appropriate evidence base. The sections within this document that follow identify what this evidence base is and where it is being updated.
- 2.8. Work on the Legacy Corporation Local Plan must build on existing work conducted by the Borough’s but also take full account of higher level strategies and policies. These are detailed below.

National Planning Policy Framework

- 2.9. The National Planning Policy Framework sets out the framework of national planning policy, including those things that must be taken into account in developing a Local Plan. All planning policies and decisions must accord with the policies set out within this document but also be developed having regard to the best practice of the Planning Practice Guidance online resource.

The London Plan and Mayoral Strategies

- 2.10. The London Plan (2011) sets out the strategic planning policies for London as a whole and any Local Plan must be in “general conformity” with the policies in the London Plan. The London Plan is accompanied by a range of supplementary planning guidance which is relevant to interpretation of the policies in the London Plan.
- 2.11. The Mayor’s Olympic Legacy Supplementary Planning Guidance (OSLP) is of particular importance, setting out his interpretation of London Plan policies and further guidance for the locations within and around the Legacy Corporation area. This sets a clear strategic context for the Legacy Corporation Local Plan.
- 2.12. The Strategic Regeneration Framework (SRF), originally published by the Growth Boroughs in 2009 sets out a framework of public sector action to address the level of disadvantage evident in those communities in comparison to those living in London as a whole. Underlying the SRF is the concept of ‘Convergence’ which is the ambition that over a twenty year period residents of the Host Boroughs would achieve the average expected in successful communities.
- 2.13. In 2011 the Mayor of London and the Growth Boroughs agreed a restructured set of convergence objectives under three theme’s:
- Creating Wealth and reducing poverty
 - Supporting healthier lifestyles
 - Developing Successful neighbourhoods
- 2.14. The Legacy Corporation will ensure that all plans and programmes are prepared in conformity with the above documents as well as the relevant planning Acts and Regulations.

3. Vision and Objectives

- 3.1. The vision and objectives within this chapter of the Local Plan set the direction for the approach to development and regeneration of the Legacy Corporation area and provide a framework from which the planning policies, the site allocations and delivery actions have been developed.

A Vision for the Legacy Corporation Area - Creating jobs and communities

Centred around the Queen Elizabeth Olympic Park, the Legacy Corporation area will become a new piece of London, where new centres and neighbourhoods reconnect surrounding areas, attract visitors and investment, and provide a focus for development that will bring economic growth, new jobs and new homes in a well designed built environment that is accessible to and useable by all. The legacy of infrastructure, restored waterways and well designed open spaces will underline the environmental quality that sets the scene for sustainable growth in economic activity and delivery of new homes. This will enable local communities to develop, grow and integrate, providing a platform for community innovation and enterprise.

As one of London's most dynamic and unique urban districts the Legacy Corporation area will provide major cultural and leisure attractions, including world class sporting venues that reinforce its role as a location of choice for business and for current and new residents. The area will provide the opportunity for a range of business, of local and international importance, to locate in high quality premises with plentiful and excellent local through to international transport links. It will also offer a range of high quality education opportunities and facilities, from early years to higher education and research, meeting the needs and aspirations of local communities and those of London and beyond.

In addition to excellent education, health and other community infrastructure being available within the area, development will have driven an improvement in the quality and accessibility of the existing local environment and contributed to the mitigation of climate change through delivery of sustainable buildings and open spaces, the availability of locally generated heat and power and the high level of accessibility to public transport, local shops and services.

Taken together, the many aspects of the Legacy Corporation area will make a substantial contribution to enabling residents in wider east London to achieve, at least the London average in the quality of life expected for successful London communities.

Objectives

OBJECTIVE 1, Business growth: secure provision of a significant range of types and sizes of work space to enable a range of businesses to locate, develop and expand within the Legacy Corporation Area, with significant business hubs developing in particular locations within the Plan period, providing a platform for community innovation and enterprise, while maximising the opportunities provided to utilise the Queen Elizabeth Olympic Park and transformed Olympic venues as an international visitor attraction that will support business growth across the area.

OBJECTIVE 2, Jobs: secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.

OBJECTIVE 3, Housing: secure a wide range of housing types, including a significant element of family homes through the development of suitable sites within the Legacy

Corporation area that are affordable for those on a wide spectrum of incomes, balancing the aspirations of new communities and helping to meet the housing need generated in the surrounding areas and more widely across London.

OBJECTIVE 4, Education: secure provision of excellent education facilities and opportunities, ranging from nursery and early years to Further and Higher Education, including employment skills and training, within the Legacy Corporation Area that meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas.

OBJECTIVE 5, Health Culture and wellbeing, seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games and a strong sense of cultural wellbeing through participation in recreation, creative and cultural activities.

OBJECTIVE 6, Urban Design & Design Quality: achieve an excellent quality of design for new buildings and within the wider urban landscape, including streets and public spaces and other open spaces, maintaining and, where necessary, improving the quality of those spaces, with a focus on the character of the location and its integration and connections with its surroundings.

OBJECTIVE 7, Creating inclusive places: seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.

OBJECTIVE 8, Creating Neighbourhoods: to expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

OBJECTIVE 9, Area characters and the historic environment: To create a new piece of London comprising of distinctive neighbourhoods, which draw upon the existing character of established areas, including their cultural assets, and respect the historic aspects of the built environment, particularly where there are conservation areas, and nationally and locally listed buildings.

OBJECTIVE 10, Sustainability: to draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimise the opportunity for negative environmental and social effects.

OBJECTIVE 11, Climate change and energy: contribute to the Mayor's target of achieving "an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025"⁴, by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.

⁴ London Plan (July 2011), Policy 5.1 Climate Change Mitigation
London Legacy Development Corporation Local Plan Interim Consultation Document/draft/vs0.1
PROTECT - POLICY

OBJECTIVE 12, Open space and biodiversity: using the open space, waterways and biodiversity legacy of the Queen Elizabeth Olympic Park to tie the area effectively into the London Green and Blue Grids, protecting and seeking enhancement of identified locations.

OBJECTIVE 13, Transport and Connectivity: seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.

OBJECTIVE 14, Convergence: contribute to meeting the aims of the Convergence Objectives of:

- Creating wealth and reducing poverty
- Supporting healthier lifestyles
- Developing successful neighbourhoods

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4. Strategic Policies

- 4.1. The vision and objectives set the overall direction for this Plan. This section sets out the strategic policies that are needed to implement this vision. Each of these fits within an overall group of policies. These are:
- Business, Economy and Employment
 - Housing
 - Historic and Built Environment
 - Infrastructure
 - Natural Environment
 - Transport and Connectivity
- 4.2. The strategic policies are set out below and alongside the most relevant objectives at the start of each policy section.

Business Economy and Employment

Strategic Policy SP1: Business, Economy and Employment.

The Legacy Corporation will seek to promote the opportunities within its area to build a strong and diverse economy and a range of high quality employment opportunities that will be accessible to those who live within its area and the surrounding areas of the Growth Boroughs. It will do this through:

- Promoting the development of cultural and leisure attractors and activity within the area, including maximising the use of the Queen Elizabeth Olympic Park and transformed Olympic venues as an international and more local visitor attraction.
- The designation and promotion of retail, commercial and industrial employment hubs, protecting the function of those hubs;
- Promoting growth in key employment and business sectors within the area and seeking to secure the necessary supporting infrastructure;
- Promoting provision of a range of sizes and types of employment and business floorspace within major development proposals;
- Promoting opportunities for development of social enterprise and cultural and creative industries as a part of the overall local business and employment mix.
- Maximising the opportunities for business provided by the areas' communication and transport infrastructure, promoting provision of international rail services for Stratford and, in the long term, the provision of a High Speed 1 to High Speed 2 rail link, in order to maximise opportunities for national and international business links.
- Promoting access to skills and employment training to increase opportunities for Growth Borough residents; and
- Promoting access to high quality education by supporting the development of new and existing schools and provision of higher education facilities, including those for postgraduate study and research.

Housing

Strategic Policy SP2: Housing

The Legacy Corporation will seek to ensure that development opportunities within its area, in combination with the range of other uses identified in this Plan, maximise the opportunities for delivering high quality, accessible and sustainable homes that provide a genuine housing choice for Londoners, meeting both the housing requirements of local people and London-wide housing need, including the need for new affordable family housing and are designed and built to be compatible with local context and character.

Historic and Built Environment

Strategic Policy SP3: The Built Environment

The Legacy Corporation will seek to ensure that the built environment within its area is well designed; creates high quality places and supports development that contributes to making places better for people. This includes the design of individual buildings, public/private spaces, as well as larger development projects which are new or subject to refurbishment or change.

Strategic Policy SP4: The Historic Environment

The Legacy Corporation will seek to ensure that the historic built environment within its area is conserved and enhanced through a positive strategy that promotes the wider social, cultural and economic benefits that conservation of the historic environment can bring. This should sustain and promote the significance of Designated Heritage Assets (Conservation Areas and Listed Buildings) and other non-designated heritage assets through encouraging viable uses consistent with their conservation and potential for heritage-led regeneration.

Infrastructure

Strategic Policy SP5: Infrastructure to Support Growth and Convergence

The Legacy Corporation will work with its partners to seek to deliver the infrastructure necessary to support the growth and development identified within this Plan and the contribution that this growth can make to achieving the objectives of the Convergence agenda. In doing so it will produce an Infrastructure Delivery Plan that will be reviewed and, where necessary updated annually, in consultation with infrastructure providers and stakeholders.

The Legacy Corporation will prepare a Community Infrastructure Levy, which once implemented, will provide monies to apply to the delivery of the infrastructure included within its CIL Regulation 123 list. Where appropriate, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations through S106 Legal Agreements. A supplementary Planning Document will be produced to provide guidance on the operation and application of the Community Infrastructure Levy and S106 Legal Agreements.

Natural Environment

Strategic Policy SP6: The Natural Environment

The Legacy Corporation will work with its partners and seek to ensure that the natural environment within the Legacy Corporation area is protected and enhanced to ensure that growth takes place within the context of a high quality environment, contributing to positive outcomes for health and well-being, while achieving an effective series of Green Grid and Blue Ribbon links within and through the Legacy Corporation area and within the wider context of the Lea Valley and East London.

Transport and Connectivity

Strategic Policy SP7: Transport and Connectivity

The Legacy Corporation will work with its partners to promote and seek to deliver the range of transport infrastructure and services that will help to deliver the growth objectives set out within this Plan, including those that will improve international, national, regional and local connectivity.

Through its planning powers, the Legacy Corporation will promote sustainable transport choices and minimise reliance on the private car to ensure that the development of the legacy area is optimised.

In doing so, the Legacy Corporation:

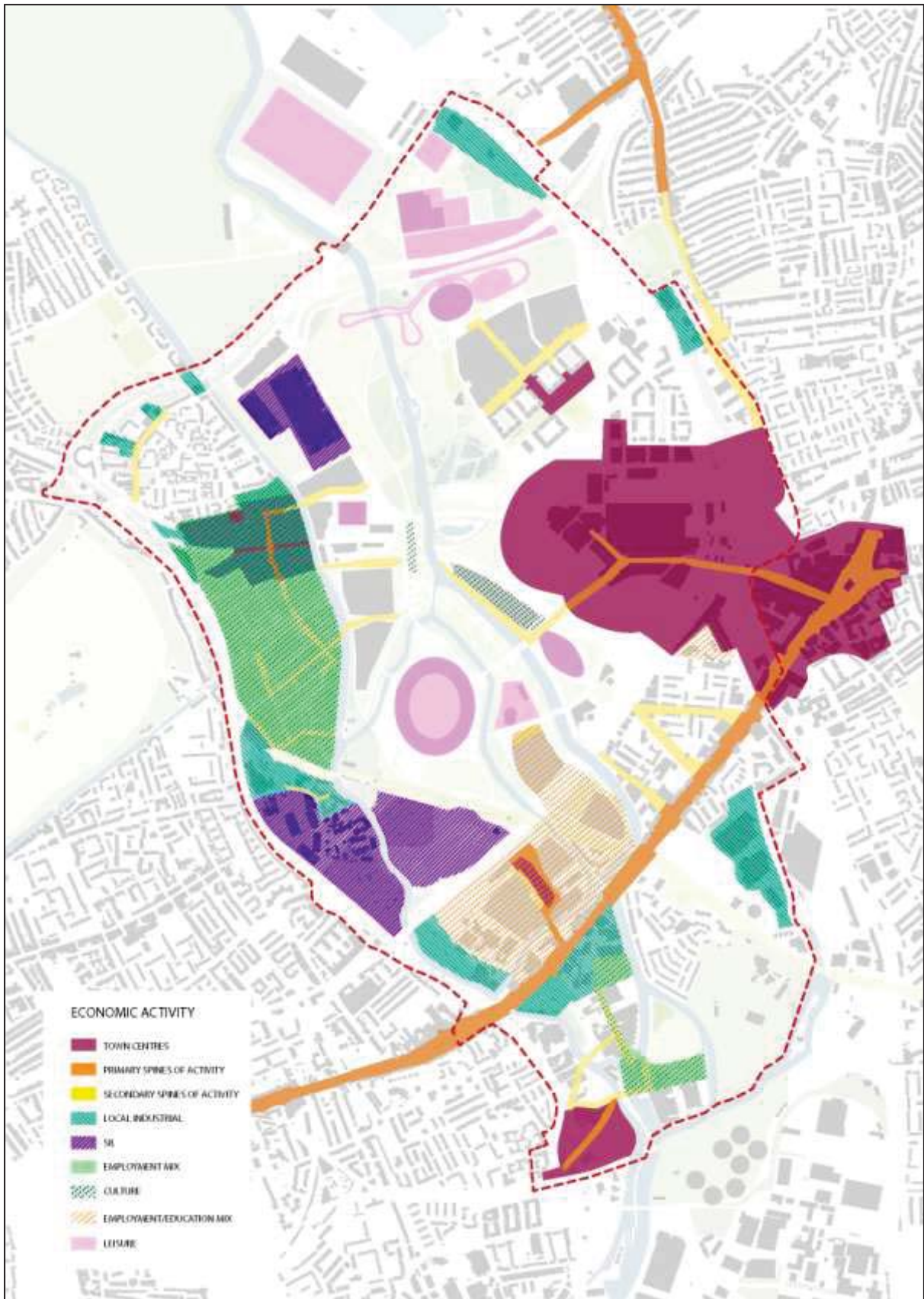
- Will seek to ensure that the amount of new development and growth across its area is related to the capacity of existing or currently planned improvements to transport infrastructure and services.
- Will expect new development to maximise the opportunities to improve connectivity across within and through the Legacy Corporation area and, where opportunities arise, with the wider Lower Lea Valley and East London.
- Will expect new development to be designed to include measures that will minimise its impact on public transport and the highway network with appropriate levels of car parking.
- Will expect new development to provide appropriate facilities for the full range of transport users, including pedestrians, rail, bus, car and cycling, and promote travel planning and smarter travel.

Delivery and Implementation of the Plan

Strategic Policy SP8: Delivery and Implementation

The Legacy Corporation will work with all relevant partners in the public and private sectors in seeking to ensure that new development within its area promotes and supports the opportunities and the policies within this plan, and to secure the investment required to deliver the infrastructure necessary to support that development and growth. It will use S106 Planning Obligations and, once implemented, its Community Infrastructure Levy to ensure that new development contributes towards meeting the infrastructure need that it will generate in accordance with Strategic Policy SP5 of this Plan.

5. Business, Economy & Employment



- 5.1. A key opportunity for the Legacy Corporation's area is the ability to build on the draw of the Queen Elizabeth Olympic Park and the legacy of the Olympic and Paralympic Games. The current, high-quality sporting offer, community and events space alongside the high-profile of the Park draw people and investment into the area, generating additional income and wealth through spend within local businesses. Popular sport, music and cultural events also create indirect jobs and investment, with a potential boost to the local economy.
- 5.2. The Legacy Corporation will build upon these opportunities to enhance the cultural, leisure and sporting offer within the Park and surrounding areas, but also encourage diversification through enhancing the cultural offer. New large-scale cultural, leisure, sporting and visitor attractions within the Park and appropriate locations at Stratford will be encouraged and will be supported, complemented by smaller scale attractions elsewhere within the Legacy Corporation area.
- 5.3. Representing a significant part of the Lower Lea Valley, the transformation of the area from one of declining industry and infrastructure to one with a mixed economy built around new infrastructure and an improved environment, is well underway, with the emergence of significant new economic hubs at Stratford and Hackney Wick and adaptation within the rest of the Legacy Corporation area, along with the emergence of new areas of mixed use development alongside existing places, particularly in Hackney Wick and Fish Island that are gradually evolving and developing from a traditional employment base to places that are more mixed in character.
- 5.4. Significant opportunity remains within the area for that business and employment growth to continue, with major permitted schemes including significant amount of floorspace for uses that will directly generate employment and provide space for businesses to locate. The Sub Area sections of the Plan set out where those future opportunities lie and where the existing areas of employment use and land either require protection or are in the process of transforming to a new character.
- 5.5. Table 5.1 shows some of the forecast employment outcomes from recent and planned significant development schemes within the Legacy Corporation area. It is likely that employment growth within the area as a whole from smaller schemes and general economic growth would increase this significantly.

Table 5.1, Forecast Employment from significant schemes

Development	Gross direct jobs (total), 2030	Sectors
Queen Elizabeth Olympic Park - iCITY	3,600	Wholesale & retail, transport, accommodation, IT, info & comms, finance, real estate, professional, admin & support, education, health, arts / entertainment, other services
QE Olympic Park – Legacy Communities Scheme	4,421	Business, wholesale & retail, transport, accommodation & food, info & comms, admin & support, arts / entertainment, other services

The International Quarter	26,200	Office, business, professional services, admin & support, wholesale & retail, arts / entertainment
Strand East (Sugar House Lane)	2,450*	Business, office, retail, financial and professional services, food, leisure
Westfield Stratford City	10,000**	Retail, food, hotel, leisure and entertainment, office and professional services, admin and support.
Chobham Farm	500***	Retail and business.

Source: LLDC – employment predictions, Report by Oxford Economics, 2013

* Source: Planning Application 12/00336/LTGOUT, Environmental Statement, February 2012

**Source: Westfield Sustainability Report 2012

***Source Planning Application 12/00146/FUM, Environmental Statement

- 5.6. Education and related research and development activity also plays an important part in the emerging change within the Legacy Corporation Area. With opportunities to develop facilities for higher education, including postgraduate study and research alongside new business and industry and provision of good quality primary and secondary education. This section of the Plan sets out the strategy for meeting the objectives set for the Plan in promoting growth and change, the approach to types of land-use and location and the policy requirements for development proposals that will help to ensure that these objectives are met. It is a requirement that this development helps to meet the needs of the new and existing population and contributes to the wider employment and education objectives for convergence within east London.

Local Plan Objectives

OBJECTIVE 1, Business growth: secure provision of a significant range of types and sizes of work space to enable a range of businesses to locate, develop and expand within the Legacy Corporation Area, with significant business hubs developing in particular locations within the Plan period, providing a platform for community innovation and enterprise, while maximising the opportunities provided to utilise the Queen Elizabeth Olympic Park and transformed Olympic venues as an international visitor attraction that will support business growth across the area.

OBJECTIVE 2, Jobs: secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.

OBJECTIVE 4, Education: secure provision of excellent education facilities and opportunities, ranging from nursery and early years to Further and Higher Education, including employment skills and training, within the Legacy Corporation Area that meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas.

OBJECTIVE 5, Health Culture and wellbeing: seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards

meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games and a strong sense of cultural wellbeing through participation in recreation, creative and cultural activities.

Strategic Policy SP1: Business, Economy and Employment.

The Legacy Corporation will seek to promote the opportunities within its area to build a strong and diverse economy and a range of high quality employment opportunities that will be accessible to those who live within its area and the surrounding areas of the Growth Boroughs. It will do this through:

- Promoting the development of cultural and leisure attractors and activity within the area, including maximising the use of the Queen Elizabeth Olympic Park and transformed Olympic venues as an international and more local visitor attraction.
- The designation and promotion of retail, commercial and industrial employment hubs, protecting the function of those hubs;
- Promoting growth in key employment and business sectors within the area and seeking to secure the necessary supporting infrastructure;
- Promoting provision of a range of sizes and types of employment and business floorspace within major development proposals;
- Promoting opportunities for development of social enterprise and cultural and creative industries as a part of the overall local business and employment mix.
- Maximising the opportunities for business provided by the areas' communication and transport infrastructure, promoting provision of international rail services for Stratford and, in the long term, the provision of a High Speed 1 to High Speed 2 rail link, in order to maximise opportunities for national and international business links.
- Promoting access to skills and employment training to increase opportunities for Growth Borough residents; and
- Promoting access to high quality education by supporting the development of new and existing schools and provision of higher education facilities, including those for postgraduate study and research.

Business and Employment Hubs

- 5.7. The Legacy Corporation area, through the existing series of major permitted development proposals and the approach set out within previously produced plans for the area, along with existing established locations contains a series of locations that form hubs of employment and business use. These hubs and their function are identified within Table 5.2 'Employment Hubs' and their location identified on Figure 5.1. Further detail and relevant policy for each of these hubs is set out in the Sub Area sections of this Plan.

Policy BEE.1 - Business & Employment hubs

The Legacy Corporation will seek to work with its partners to promote and develop the employment hubs identified in Table 4.2, encouraging the development of a range of uses that are appropriate to the identified function of each hub.

Where development is proposed within those hubs:

- It should be predominantly non-residential in character, except where a specific policy or proposal elsewhere in this plan indicates otherwise;
- It should not result in a decrease in the amount of employment floorspace or the employment density of the site and must demonstrate that the use or mix of uses complements the identified function of that hub. In the case of Hackney Wick Employment Hub, the balance of new uses should reflect both the Neighbourhood Centre and Other Industrial Location designations.
- Development proposals that would materially change the identified function of that employment hub will not be permitted.

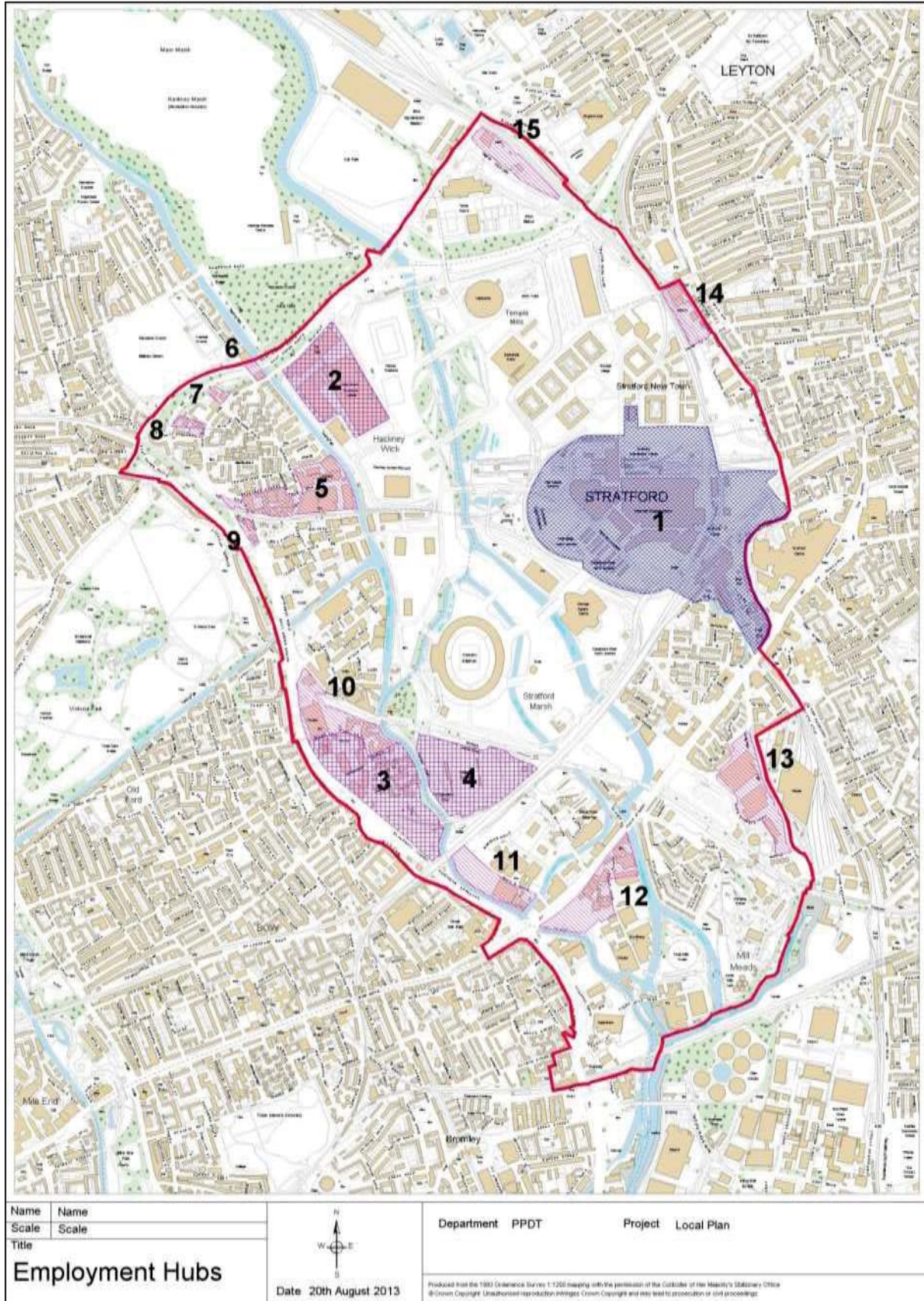
Table 5.2, Employment Hubs

	Employment Hub	Hub Function
1.	Stratford Town Centre Extension	An extension to the existing town centre to create a new Metropolitan Centre, containing a range of primary retail uses in Use Classes A1-A5, Hotels, commercial leisure use, a regionally significant quantum of grade A office space, other supporting retail and commercial uses and a subsidiary element of residential and student accommodation, set around the transport hubs of Stratford Regional Station and Stratford International Station.
2.	iCity (Hackney Wick)	A Strategic Industrial Location (Industrial Business Park) comprising a range of complimentary employment uses of regional significance, including technology based industry, broadcasting and production uses and including further and higher education, research and development activity, office space and subsidiary supporting uses.
3.	Fish Island South	A Strategic Industrial Location (Preferred Industrial Location), comprising a range of significant industrial, warehousing, transport and distribution uses, alongside small scale subsidiary supporting uses in retail use classes and rail yard.
4.	Bow Goods Yard	A Strategic Industrial Location (Preferred Industrial Location), comprising a safeguarded rail

		head and associated bulk freight distribution use.
5.	Hackney Wick Local Employment Location	An 'Other Industrial Location'. An integral part of the wider Hackney Wick Neighbourhood Centre, supporting a range locally significant employment uses including cultural and creative industries, neighbourhood retail and flexible business space, including a range of space suitable for Small and Medium sized businesses.
6.	Site at junction of Lee Conservancy Road and Eastway	Locally Significant Industrial Site, partly in LB Hackney and partly in Legacy Corporation planning authority areas. Site currently in industrial use and suitable for a future industrial, storage and distribution or transport related use.
7.	Site at Eastway, Osbourne Road	Locally Significant Industrial Site. suitable for small scale future industrial, storage and distribution or transport use.
8.	Buxhall Crescent, Eastway	Locally Significant Industrial Site. Mixed industrial and business use and transport associated use.
9.	Site at Chapman Road	A Locally Significant Industrial Site, comprising a mix of small scale industrial, storage and distribution uses.
10.	Wick Lane and Crown Close, Fish Island	An Other Industrial Location, with an employment led mix of uses, including warehouse, storage, distribution, with some potential for residential development and live work in appropriate locations. An appropriate and gradual transition to reflect nearby uses of residential and industrial.
11.	Cooks Road	A Locally Significant Industrial Site. Land between Cooks Road and River Lea, redevelopment opportunity with a significant proportion of employment use providing floorspace within a range of use uses classes B1-B8 alongside other uses, with an element of residential, providing a transition to the lower employment mix of uses within

		the remainder of Pudding Mill.
12.	Sugar House Lane/Stratford High Street	A Locally Significant Industrial Site. Area at the northern end of the Strand East site, partly fronting Stratford High Street, with an existing planning permission for a cluster of development for a mix of predominantly office, workshop, retail and associated business and employment generating uses.
13.	Rick Roberts Way	A Locally Significant Industrial Site. A cluster of existing high quality industrial design and manufacturing uses in modern buildings.
14.	Leyton Road North	A Locally Significant Industrial Site. A range of storage and distribution uses, with potential for additional small scale business accommodation.
15.	Temple Mills Lane	A Locally Significant Industrial Site. Transport uses appropriate to or subsidiary to current use as Bus Depot.

Figure 5.1, Employment Hubs



Strategic Industrial Land

- 5.8. The London Plan defines Strategic Industrial Land (SIL) within two categories:
- **Preferred Industrial Locations (PIL)** “which are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities”.
 - **Industrial Business Parks (IBP)** “which are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution”.
- 5.9. The three areas of SIL identified within the Legacy Corporation area are the result of a process of SIL consolidation in which some areas surrounding the SIL locations within Hackney Wick and Fish Island have been released from this designation through the previous plan making processes. In the case of Hackney Wick, some further adjustment has been made to take account of the extent of the iCity area. Each of these locations play a strategic role in providing a land resource for appropriate uses as identified in Table 5.2. Given the role identified and the recent review and release of land from SIL designation it is not considered that this limited area presents an opportunity for further release. The overall strategy requires the retention of this land in SIL related use in order to maintain and develop the mix of employment and business opportunity that is sought by this Plan.

Policy BEE.2 Strategic Industrial Land

Land identified as Strategic Industrial Land Figure 5.1 at iCity Hackney Wick, Fish Island South and Bow Goods Yard, will be safeguarded for Employment Uses appropriate to its designation, including the description in Table 4.2 Employment Hubs, and in accordance with London Plan Policy 5.4. Proposals for non-compliant uses within these defined SIL locations will not be permitted.

Locally Significant Industrial Sites and Other Industrial Locations

- 5.10. Locally Significant Industrial Sites and Other Industrial Locations are the locations identified in Table 5.2 which it is considered provide a significant and concentrated resource of land and/or business premises that make a focused contribution to the economy within the Legacy Corporation area and, as a result of their current contribution or capacity, to absorb new business growth. These locations are more specifically described within the relevant Sub Area Sections, along with the appropriate range and general mix of uses that will be sought in each of these locations. Small and medium sized enterprises (SME's) comprise a significant proportion of the existing businesses within the Legacy Corporation area and represent one of the main areas of potential business and employment growth. It is important the business space provision makes sufficient and flexible provision for SME's within all parts of the area and in particular builds on the existing network of businesses in areas such as Fish Island and Hackney Wick and Sugar House Lane.

Policy BEE.3 Locally Significant Industrial Sites and Other Industrial Locations

Locally Significant Industrial Sites and Other Industrial Locations are those defined within the relevant sub area sections of this Plan. The Legacy Corporation will promote a mix of uses within these locations that meet the employment and

business needs of its area and the wider strategic needs of the Growth Boroughs and east London as a whole. Development proposals within these locations:

- Should maintain the balance of uses defined in the relevant sub area section of this Plan
- Should result in a mix of employment uses within the area that results in provision of premises suitable for Small and Medium sized businesses.

Employment uses in other locations

- 5.11. The Legacy Corporation area contains a wide range of business floorspace, in size and type, not all of which is located within the employment hubs that are identified in Table 5.2. In order to retain and develop the economic contribution that these locations and businesses make, it is necessary to ensure that an overall supply of land and a range of size of business accommodation is retained and available. Where new development is proposed in locations that host existing employment use, it is important that those schemes do not result in a loss of that floorspace unless it can genuinely be shown that there is no viable future for employment use in that location or that the proposed new development includes new equivalent employment generating floorspace that replaces what would otherwise be lost and that types of use proposed accord with the character and purpose set out in the Sub Area sections of the Plan.
- 5.12. Not all recent mixed-use schemes within the area have been capable of attracting occupation of the business floorspace provided. To avoid the delivery of such floorspace in a form that is unlikely to attract occupation, it is important that consideration is given to the type of businesses or other employment use that the space is aimed to attract and the way in which the units are designed, accessed and managed.
- 5.13. Where development proposals do not include a re-provision of employment generating floor space, it is important to be sure that this is not a loss of existing viable floorspace or the loss of an opportunity to provide new floorspace within the scheme that would be capable of contributing to the economic objectives of the Plan.

Policy BEE.4 Employment uses in other locations

Proposals for development on sites within an existing or previous employment use should:

- Retain or include an equivalent amount of employment floorspace
- Demonstrate that there is a demand for the type of employment floor space proposed
- Demonstrate that there is no conflict between the employment and other uses proposed.
- Provide evidence of adequate access and servicing for the type of units and use proposed.

Where no new employment floorspace is proposed, evidence must be provided to demonstrate that there is no demand for the existing or other employment uses appropriate to its location as defined elsewhere in this plan, including evidence that those employment uses would be unviable and evidence that the site has been marketed for appropriate employment use at a reasonable rate for a minimum of two years.

Mixed use locations

- 5.14. While some of the existing and new locations within the Legacy Corporation area will be essentially residential in character, many will be mixed use and provide a resource of employment floorspace that will be appropriate outside of the identified hubs and centres. The Sub Area sections of the Plan will identify the character of those locations and mix of uses that it is considered will achieve this.

Policy BEE.5 Mixed use locations

Where the sub area sections of this plan identify locations appropriate for mixed use development, proposals for development should demonstrate that the mix of uses proposed contributes towards achieving the mix of uses identified. Proposals that do not contribute towards achieving the identified mix and character will not be permitted.

Managed and affordable workspace

- 5.15. In order to enable locally based business establishment and growth it is essential that development includes a range of business unit sizes and types. In particular the establishment of a pool of managed workspace that will help new businesses start up and grow is encouraged.
- 5.16. Managed workspace, would normally comprise a number of business units or workspaces for independent individuals and/or small businesses, which together are communally managed and provided with a range of shared support services and facilities. Affordable workspace could be managed workspace or unsupported independent business space but is made available to tenants for a rent that is below the prevailing market rent for that type of space. In either case, in order to ensure that such space is managed appropriately in accordance with the intentions of the policy, proposals should be accompanied by a management scheme and, where this is 'affordable workspace' it will be necessary to demonstrate that rent levels for the space are below the prevailing market rates. Where appropriate, the use of land or existing buildings for managed and/or affordable workspace will be encouraged.

Policy BEE.6 Managed and affordable workspace

Proposals that include the provision of managed workspace and, or affordable workspace will be encouraged and supported, where they comply with the other policies in this plan. Where affordable workspace is proposed, evidence of the affordability of the workspace must be provided along with a proposed management scheme. The appropriateness of a scheme of rent levels and the principles of the management scheme will be secured through Section 106 Agreement. The quantum, mix of unit sizes and scheme of rent levels will be assessed in the light of overall scheme viability.

The interim use of land or buildings for managed or affordable workspace prior to delivery of long term phased development with a planning permission will be viewed favourably where it can be demonstrated that there will be no adverse effect on the amenity of surrounding permanent development and where the delivery of the uses with permanent planning permission will not be prejudiced.

Town, Neighbourhood and Local Centres

5.17. The Legacy Corporation area includes the existing centres, those which have been identified as required within the previous plans produced for the area or centres within specific major development schemes that have received planning permission. The centres are identified at Figure 5.2 and described in Table 5.3. These provide a focus for the retail, leisure and commercial activity. Stratford Town Centre extension provides the main commercial hub for the area as an emerging Metropolitan Centre. The East Village area includes an element of built retail and commercial floorspace, with additional space yet to be built, while Pudding Mill Lane Local Centre and Bromley-by-Bow District Centre are to come forward through the comprehensive development of their vicinity. Hackney Wick Neighbourhood Centre, designated in part through the Fish Island Area Action Plan, has been extended to include an area to the north of Hackney Wick Station, which was not previously designated in the Hackney Wick Area Action Plan. The function of this neighbourhood centre is one that is mixed with its Other Industrial Location status to provide a distinct character to this location. The Sub Area sections set out further detailed information and policy on the character of each of the centres.

Policy BEE.7: Town, Neighbourhood and Local Centres.

The town and local centres identified in Table 5.3 will be the focus for new retail, commercial, community and leisure floorspace. The type and scale of new floorspace in these locations should be appropriate to the identified hierarchy of centres. Residential development will be acceptable in all centres unless the quantum of residential use proposed will, on its own or cumulatively, prejudice the identified function of that centre.

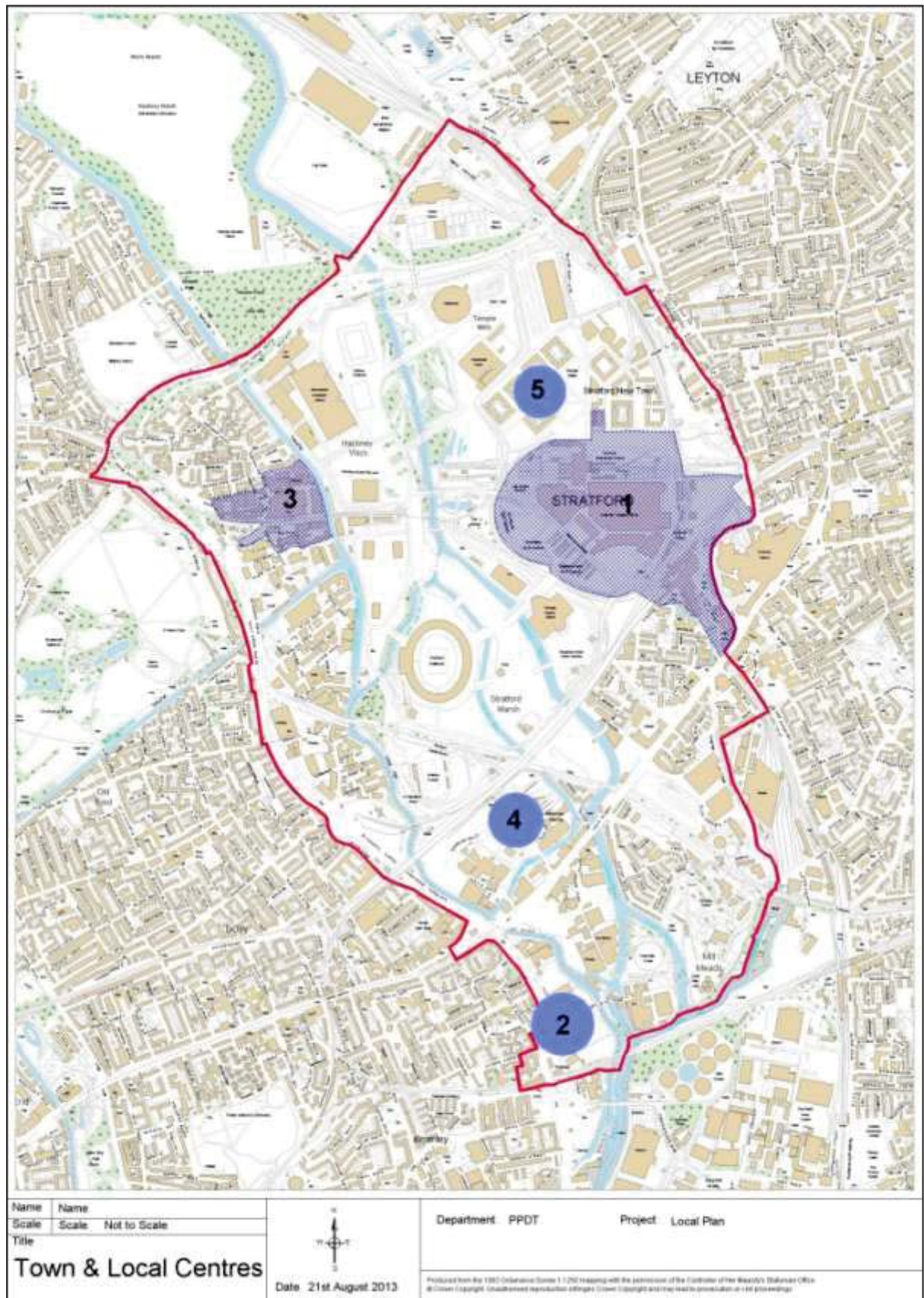
Table 5.3: Town and local centres hierarchy and function

	Centre Name	Place in Centre Hierarchy	Description
1.	Stratford Town Centre Extension	Emerging Metropolitan Centre (in combination with existing town centre)	Emerging as a Metropolitan centre, a focus for major retail, leisure, hotel, office and other commercial uses with a scale of London-wide significance.
2.	Bromley-by-Bow	Proposed District Centre	Existing supermarket superstore with future potential for development of complimentary retail, commercial, leisure and community uses.
3.	Hackney Wick	Proposed extended Neighbourhood Centre	Currently designated as a neighbourhood centre within LB Tower Hamlets, with potential for development of a mix of local retail, commercial and other supporting uses,

			alongside wider employment generating uses in combination with the Other Industrial Location designation.
4.	Pudding Mill	Proposed new Local Centre	Retail and commercial uses serving local need and focused on the area adjacent to the Pudding Mill DLR Station. To be delivered as part of future Pudding Mill redevelopment.
5.	East Village	Proposed new Local Centre	Retail and commercial uses to serve local need, permitted floorspace constructed in part.

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Figure 5.2 Map of Town and Local Centres



Retail and commercial uses outside of designated centres

- 5.18. The centres identified at Table 5.3 are the proposed hubs for retail and commercial activity within the Legacy Corporation area, each of which are within locations that have access to one or more specific transport hubs, for example Pudding Mill and Pudding Mill DLR station, Bromley-by-Bow and Bromley-by-Bow Underground station. The size and function of those centres relates to the character of the location and the level of transport accessibility. In order to protect the current and future function of each centre it is considered necessary to generally direct retail and commercial uses to the centres unless they are very local in nature and scale.

Policy BEE.8: Retail and commercial uses outside of designated centres

Outside of the designated town and local centres, proposals for retail, commercial or leisure uses should be small and of a scale and nature that they provide services to the immediate business and residential community. No single unit should occupy an area greater than 280 sqm. Proposals for such uses of a greater than local scale will not be permitted unless it can be demonstrated that they relate directly to the wider existing function of that place, are subservient to another use or it can be demonstrated that a larger floorspace area is necessary to serve the local residential or business community.

Jobs, skills and employment training

- 5.19. The number of jobs available within the Growth Boroughs has been growing over time and this growth is forecast to continue. However, a significant disparity has been identified between the number of jobs available and those which are going to Growth Borough residents. Research by Oxford Economics has identified that 58% of jobs across the four boroughs (Hackney, Newham and Tower Hamlets, and Waltham Forest) are taken by those commuting into the area to work. It is further identified that there are 45% of borough residents with a degree or greater level of qualification, closely meeting the demand for employees with this level of education. However, there are twice as many borough residents with no qualification than there are suitable jobs. The report concludes that “This makes it difficult for residents to compete for low / medium skills jobs, highlighting the overall gap between the skill needs of the area and the existing skills pool available”.
- 5.20. It is, therefore important to ensure that current and future residents within the Legacy Corporation area have access to the employment and business opportunities that will emerge in the Legacy Corporation Area over the life of this Plan and that these opportunities are available across the range of employment opportunities that are forecast to emerge. This includes encouraging relationships between businesses operating within the Legacy Corporation area and local school, to raise aspirations and help prepare young people to have the right information, motivation and aptitude to compete with the best across London to be the future workforce.
- 5.21. A key element of achieving this will be the continued working with the Growth Boroughs and other partners to promote utilisation of jobs, skills and employment training, and where appropriate using the planning system to secure targets and commitments in relation to associated job and training opportunities, both for construction related employment and training that will increase access to end user employment. Any targets or commitments will be defined on a case by case basis, taking into account the size and nature of the scheme proposed and, where relevant,

scheme viability. Where feasible and relevant, the Legacy Corporation will support delivery of commitments made or targets set through any of its own related programmes or projects that are operational at the time.

Policy BEE.9: Jobs and skills and employment training.

The Legacy Corporation will encourage all local employers to participate in local current skills and employment training initiatives to increase access to employment for those who live within the area and the surrounding Growth Boroughs. Where development proposals would generate a significant number of construction and operational phase jobs, the Legacy Corporation will seek to enter into a S106 Agreement to secure appropriate commitments and targets for employment skills and training appropriate to the development proposed.

Higher Education, Research and Development

- 5.22. The Legacy Corporation area is host to a range of further and higher education establishments ranging from the Building Crafts College adjacent to Stratford Regional Station, to the University of East London campus at Duncan House, Stratford High Street and with Loughborough University and Hackney Community College proposing to take up a significant area in the iCity proposals in Hackney Wick. With other institutions based in and around Stratford Town Centre, including the new Birkbeck College and UEL campus, and the UEL campus at Romford Road, a distinct graduate and postgraduate sector is emerging within the wider local economy, complimented by the further education institutions. This presents an opportunity to focus postgraduate study and research activity alongside the existing and planned institutions to complement the developing range of new industry and business activity around Stratford Metropolitan Centre, iCity, Hackney Wick and Fish Island and build on the establishment of Cultural, Creative businesses and the extension of 'TechCity' to the area.

Policy BEE.10: Higher Education, Research and Development

The Legacy Corporation will support and encourage the provision of facilities for higher education, postgraduate study and research and wider research and development activity as part of its strategy to develop a strong and diverse economy within its area and more widely in East London. These facilities should generally be located within or adjacent to the Employment Hubs identified in this Plan and have easy access to public transport hubs. Proposals for facilities within areas of mixed use development will be required to demonstrate that they achieve a high level of amenity for those living and working in that location.

Schools

- 5.23. Provision of schools and school places within the Legacy Corporation area as part of the wider network of schools within each of the boroughs, provide an important focus for achieving the aims of convergence set out in the vision and objectives of this Plan.
- 5.24. There are several existing schools within the Legacy Corporation area:

- Chobham Academy, located within the new East Village, is an all through school providing nursery, primary, secondary and sixth form places, with capacity for a total of 1800 students;
 - The London Academy of Excellence is a sixth form college located on Stratford High Street;
 - The East London Science School, located in temporary accommodation at Three Mills will provide secondary education for up to 240 pupils.
 - There are two existing primary schools, Gainsborough Primary School at Hackney Wick and Carpenters Primary School, Stratford. Both have recently expanded to become three form entry schools.
- 5.25. There are several new schools proposed within the Legacy Corporation area, primarily planned to meet the projected need for new school places from the population associated with permitted new development. The schools associated with the Legacy Communities Scheme are:
- Secondary School at Rick Roberts Way, Stratford
 - Two primary schools, one at Hackney Wick, adjacent to iCity and one at Fish Island East.
- 5.26. A new primary school also forms part of the development permitted at Bromley-by-Bow (south), while the location for a new primary school is also identified at Monier Road, Fish Island within the Fish Island Area Action Plan (2012).
- 5.27. Schools and school place provision will not work in isolation within the Legacy Corporation area, with these schools forming part of a wider network within the surrounding area. Schools will be encouraged to use the assets of the Queen Elizabeth Park and economic growth within the Legacy Corporation area to inspire a generation of east Londoners to believe that with the right support, ambition and determination, they can compete with the best of London and beyond. New schools that are close to the area boundary include School 21 a new all through free school at Rokeby Street, Stratford and the relocated and expanded Bow School, a secondary school and sixth form located at Bow Locks, Bromley-by-Bow.
- 5.28. While uncertainty exists as to the precise number of new school places that will be required within and around the Legacy Corporation area within the lifetime of this Plan, evidence indicates that there will be a general deficit in the capacity of existing schools, particularly primary age pupils.
- 5.29. Uncertainty also exists around the number of children requiring school places that will be generated from the population living in the new development planned for the Legacy Corporation Area. Initial assessment through the Infrastructure Delivery Plan indicates a requirement 2,138 primary school places and 650 secondary school places during the plan period to 2031 that would be needed in addition to the existing and planned supply. However, a more detailed study (LLDC Schools Mapping Study, July 2013, Quod), indicates that this figure is likely to be at least 20% lower.
- 5.30. Based on a review of the existing and planned provision within and around the Legacy Corporation area, it is considered that there is potential for sufficient schools provision within the Legacy Corporation area. Given the potential for unconfirmed free school and other new school proposals to come forward over time and conversely the need to plan for the possibility that some current school allocations, where tied to specific development schemes, may not come forward, it will be necessary to monitor and review school provision and population change over time in

order to ensure that provision keeps pace with meeting need. The preferred approach will be to seek implementation of planned new provision and where it is indicated that school place requirements are greater than planned seek to expand the provision within existing and planned schools where capacity to do so exists. Where, evidence indicates that this further capacity is unlikely to be sufficient, to pursue delivery of an additional new school where it has been possible to identify a deliverable site of sufficient size and in a location and form that meets the requirements of Policy BEE11. The introduction of University Technical Colleges, for 14 to 18 year olds, specialising in technical skills is likely to have an influence on form of provision.

- 5.31. In designing and building new schools, it will be expected that these will meet or exceed the best practice standards current at the time. These are currently:
- Building Bulletin 98: 'Briefing framework for secondary school projects'.
 - Building Bulletin 99: 'Briefing framework for primary school projects'.

Policy BEE.11: Schools

The Legacy Corporation will work with the borough education authorities and other partners to secure the provision of planned new schools within its area and, where appropriate, the expansion of existing schools or proposals for new schools.

In determining planning applications, the Legacy Corporation will support proposals for provision of new primary, secondary and all through schools within its area provided that:

- It is possible to demonstrate that the proposed school meets an identified need for school places within the Legacy Corporation area and from surrounding communities within the adjacent borough areas.
- It is possible to demonstrate that the school is accessible safely and sustainably, by walking and cycling and public transport, through provision of an adequate transport assessment and a school travel plan with any planning application. Mitigation measures identified by the transport assessment and measures identified in the travel plan will be secured by appropriate conditions on any planning permission or appropriate S106 Planning Obligations.
- It is possible to demonstrate that the school makes adequate provision, preferably on-site, for play areas and playing fields in accordance with the schools standards and guidance in place at that time and relevant to the type of school proposed.
- Where schools are proposed within temporary premises it should be demonstrated that there is a high degree of certainty that a permanent site or premises will be available at the expiry of that temporary period.

References and evidence base

- London Legacy Development Corporation- Infrastructure Delivery Plan (2013)
- London Legacy Development Corporation Schools Mapping Study, July 2013, Quod
- LLDC – employment predictions, Report by Oxford Economics, 2013
- Planning Application 12/00336/LTGOUT, Environmental Statement, February 2012
- Westfield Sustainability Report, 2012

- Planning Application 12/00146/FUM, Environmental Statement
- Mayor of London - London Plan, 2011
- Mayor of London- Olympic Legacy SPG, 2012
- The Mayor's Economic Development Strategy, Mayor of London, May 2010
- GLA- Employment Sites Database
- London Borough of Hackney Core Strategy, 2010
- London Borough of Hackney, Hackney Wick Area Action Plan, 2012
- London Borough of Hackney, Employment Growth Options Study, 2010
- London Borough of Waltham Forest Core Strategy, 2012
- London Borough of Newham Core Strategy, 2012
- London Borough of Newham Employment Land Review, Employment Cluster Summary Report, 2010
- London Borough of Newham Retail Capacity Study, 2010
- London Borough of Tower Hamlets Core Strategy, 2010
- London Borough of Tower Hamlets, Fish Island Area Action Plan, 2012
- London Borough of Tower Hamlets, Employment Land Study, 2009
- London Borough of Tower Hamlets, Retail and Leisure Capacity Study, 2009
- London Borough of Tower Hamlets, Town Centre Policy Development, January 2011
- London Borough of Tower Hamlets, Bromley By Bow Masterplan SPD, 2012

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6. Housing

- 6.1. Helping meet London's need for new homes through the creation of a network of new neighbourhoods which are designed to meet the needs of existing and future communities at all stages of life and provide access to employment opportunities, local shops, and community, cultural and social infrastructure, is a priority for the Legacy Corporation.
- 6.2. The Legacy Corporation area is one of the fastest growing local planning authority areas in the United Kingdom. In 2012 alone 110 new postcode addresses were added by the Royal Mail to accommodate new levels of development. The economic history and geography of the area means the Legacy Corporation area has a very low existing population density. The number of existing homes across the whole Legacy Corporation area totals approximately 4533 homes with an existing population of approximately 10,273 people.
- 6.3. The pressure for new homes is significant. A combination of a growing demand for new homes and an increasingly buoyant housing market in London has made much of the capital unaffordable to those on low income. Demand for affordable housing is high and it is the role of the Legacy Corporation to ensure mixed and balanced communities are achieved by providing a range of accommodation that allows a choice of housing tenures and types of accommodation, at a price residents can afford.
- 6.4. Planning for housing in the Legacy Corporation area requires a unique approach. Four local housing markets function within the area, each with very distinct characteristics and each have their own housing policies tailored to meet locally identified housing needs. East London is also distinctively a well defined sub regional housing market; and the level of housing growth in the Legacy Corporation area will have economic and social benefits which stretch beyond the Legacy Corporation boundary. Therefore the approach taken by the Legacy Corporation reflects and meets local challenges, opportunities and circumstances but also strategic priorities because of the opportunities for regenerating this part of London and the strategic nature of the Legacy Corporation.
- 6.5. As with all London boroughs, the Legacy Corporation is directed by the London Plan on a range of housing policies, including strategic housing targets, density and space standards. All of which form part of the Legacy Corporation Local Plan. The National Planning Policy Framework and the governments housing welfare reforms have particular implications for how housing needs are planned for and met in the Legacy Corporation area and across the capital.
- 6.6. The Legacy Corporation has a pipeline of planning permission equivalent to 82% of the total projected housing growth in the area. Housing growth is expected to provide a total of 24,000 new homes by 2031. Population projections identify an increased population of approximately 55,000 people by 2031. The Strategic Housing Market Assessment estimates a net annual requirement for approximately 441 new affordable homes to be provided over the next 15 years to address demand and affordability issues.

Local Plan Objectives

OBJECTIVE 3, Housing: secure a wide range of housing types, including a significant element of family homes through the development of suitable sites within the Legacy Corporation area that are affordable for those on a wide spectrum of incomes, balancing the aspirations of new communities and helping to meet the housing need generated in the surrounding areas and more widely across London.

OBJECTIVE 6, Urban Design & Design Quality: achieve an excellent quality of design for new buildings and within the wider urban landscape, including streets and public spaces and other open spaces, maintaining and, where necessary, improving the quality of those spaces, with a focus on the character of the location and its integration and connections with its surroundings. Creating inclusive places: seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.

OBJECTIVE 8, Creating Neighbourhoods: to expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

OBJECTIVE 10, Sustainability: to draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.

Strategic Policy SP2: Housing

The Legacy Corporation will seek to ensure that development opportunities within its area, in combination with the range of other uses identified in this Plan, maximise the opportunities for delivering high quality, accessible and sustainable homes that provide a genuine housing choice for Londoners, meeting both the housing requirements of local people and London-wide housing need, including the need for new affordable family housing and are designed and built to be compatible with local context and character.

Housing Provision and Supply

- 6.7. The Legacy Corporation will seek to achieve and exceed the housing target set out in Policy H1. The Legacy Corporation will seek and encourage opportunities for intensification, town centre renewal, mixed use development and the sensitive renewal of existing residential areas.
- 6.8. This target will be achieved from a range of sources including non self contained dwellings such as hostels, student accommodation and the reuse of long term vacant properties. The figure has been agreed with the Mayor and has been informed by robust assessments of housing needs using up to date census information and the 2013 London Strategic Housing Land Availability Assessment (SHLAA). In line with the NPPF, greater consideration has been given to the full range of housing needs in setting the London Plan targets.

- 6.9. Table 6.1 below disaggregates the target into sites and broad areas. The estimates are based on the latest information on sites at the time of writing this Local Plan and will be subject to periodic review. The table usefully demonstrates that the Legacy Corporation has the capacity to meet the housing target total. The table attempts to add a delivery date to the sites based on evidence gathered through the SHLAA process. The delivery of the homes will depend on macro economic factors affecting build rates and therefore the Legacy Corporation will keep this information under review in the Legacy Corporation Annual Monitoring review.
- 6.10. The housing target in the London Plan is a 10 year target which recognises the difficulty of identifying housing land in London beyond that period. However, the Legacy Corporation is planning for a 15 year horizon, consistent with the NPPF, and has therefore rolled forward the annualised average target for the 15 year period. This approach is recommended in the London Plan and the Mayor's Housing SPG 2012. The Legacy Corporation has therefore planned its housing land supply requirement on a basis of a 15 year period.
- 6.11. Paragraph 47 of the NPPF requires local authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%. The Legacy Corporation is planning for an additional 5% buffer. The administrative area of the Legacy Corporation is a new boundary which makes assessing past performance an impractical exercise, limited development existed on the Olympic Park and the four boroughs are planning on the basis of a 5% buffer, this is the percentage being applied to the Legacy Corporation Local Plan.
- 6.12. The Figure 6.1 below sets out the housing trajectory for the Legacy Corporation. The analysis has been informed by the results of the London SHLAA which included robust and comprehensive phasing assumptions informed by discussions with developers and landowners and also informed by knowledge of the local housing and land market. The trajectory clearly shows the ability to meet the 5 year housing land requirement set out in the NPPF. The Legacy Corporation has enough deliverable and available land to meet and exceed the London Plan housing target and the 5% additional buffer (for the first 5 years only) for years 0-5 and years 6-10. The churn of land uses in London makes assessing land beyond 10 years, with any degree of certainty, difficult. However, the Legacy Corporation has sought to provide a longer trajectory and commits to identifying and updating annually the supply of sites sufficient to maintain a rolling 5 years worth of land to support housing delivery.

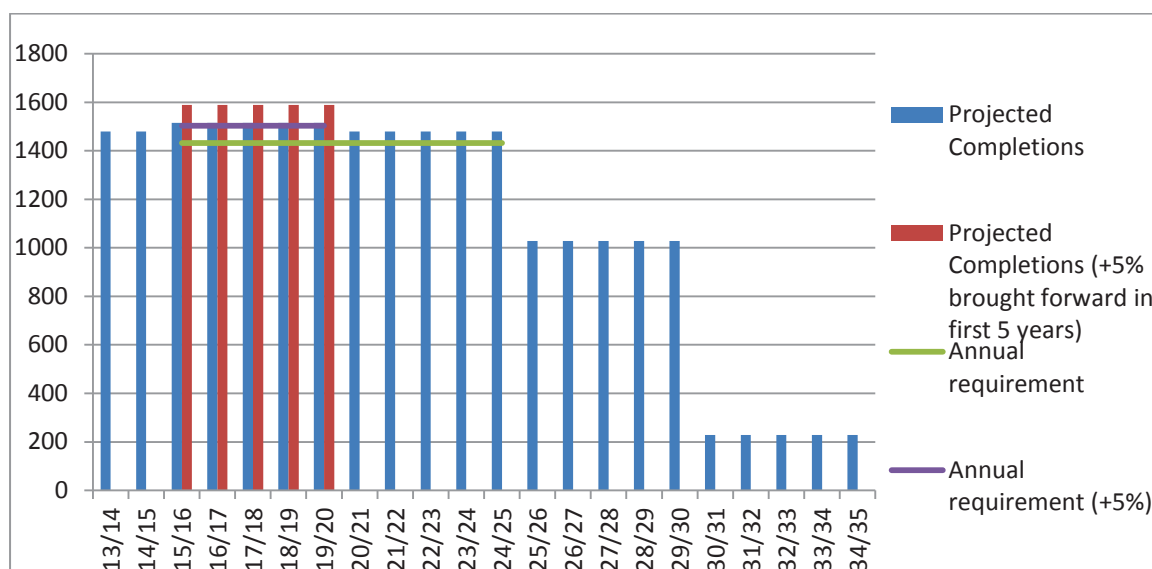
Table 6.1, Estimates of Housing Delivery 2013/14-2030/31

Site details	2013/14- 2014/15	2015/16 - 2019/20	2020/21- 2024/25	2025/26- 2029/30	2030/31- 2034/35	Total
Consented Schemes (Outline or Full Planning)						
St Mary of Eton Church complex, Eastway	0	27	0	0	0	27

Site details	2013/14- 2014/15	2015/16 - 2019/20	2020/21- 2024/25	2025/26- 2029/30	2030/31- 2034/35	Total
Eastwick (part of - 1), Queen Elizabeth Olympic Park	0	241	240	0	0	481
Eastwick (part of - 2), Queen Elizabeth Olympic Park	0	205	204	0	0	409
Sweetwater, Queen Elizabeth Olympic Park	0	380	380	0	0	760
Chobham Manor, Queen Elizabeth Olympic Park	0	425	425	0	0	850
Stratford City (north of the International Station)	2782	1036	818	818	0	5454
Chobham Farm, Leyton Road	176	622	238	0	0	1036
Queen Elizabeth Olympic Park, North of Aquatics	0	0	786	786	0	1572
Queen Elizabeth Olympic Park, south of Aquatics	0	0	133	0	0	133
Queen Elizabeth Olympic Park, South of the ArcelorMittal Orbit	0	0	480	479	0	959
The International	0	0	0	334	0	334

Site details	2013/14- 2014/15	2015/16 - 2019/20	2020/21- 2024/25	2025/26- 2029/30	2030/31- 2034/35	Total
Quarter, Stratford City						
Cherry Park, Stratford City	0	276	453	376	0	1105
Site bordering Great Eastern Road and Angel Lane	0	931	64	64	0	1059
Land at Pudding Mill Lane	0	0	630	630	0	1260
Rick Roberts Way, Stratford High Street	0	0	200	200	0	400
Strand East (Sugar House Lane)	0	852	348	0	0	1200
Bromley by Bow North Site	0	371	370	0	0	741
Bromley By Bow South Site	0	0	150	150	155	455
68-70 High Street, Stratford	0	87	86	0	0	173
Corner of Westfield Avenue, Stratford City	0	951	0	0	0	951
Sub total 1	2958	6404	6005	3837	155	19359
Additional estimated capacity by Sub Area -without any consent						
Sub Area 1	0	367	878	857	713	2815
Sub Area 2	0	0	0	0	0	0
Sub Area 3	0	150	510	341	168	1169
Sub Area 4	0	0	0	106	105	211
Sub total 2	0	517	1388	1304	986	4195
Total	2958	6921	7393	5141	1141	23554

Figure 6.1 Legacy Corporation Housing Trajectory



Housing Density and Design

- 6.13. Housing development should be of the highest quality inside and externally and in relation to their context and to the wider environment. All housing developments should have adequate provision of internal space in order to provide an appropriate living environment. To achieve this, the Legacy Corporation requires all developments to meet the minimum space standards set out in Policy 3.5 of the 2011 London Plan. As far as is practicable and viable, the Legacy Corporation also expects the housing design guidance published by the Mayor in Chapter 3 of the 2012 Housing SPG to be incorporated into the design of schemes. These standards have evolved from the 2010 London Housing Design Guide, and whilst they are only guidance, they usefully demonstrate what is needed to protect and enhance London’s residential environment and attractiveness as a place to live.
- 6.14. To make the most efficient use of land and to ensure maximum opportunities for additional homes, the Legacy Corporation supports the London Plan approach which states that appropriate densities depend on a complex range of factors including the location, management, occupancy and tenure of a development and all should be taken into account when schemes are designed. The London Plan density matrix is a useful tool which provides general guidance cross referencing the number of habitable rooms per hectare with Public Transport Accessibility Level (PTAL) scores. The higher the PTAL score is, the higher density should be sought. Regard should be had to the London Plan density matrix when designing developments.

High Density Development

- 6.15. Large parts of the Legacy Corporation area are currently undeveloped or have no definable residential character. Appropriate densities for such sites/areas should primarily be guided by the strategic and local proposals for the sites/areas; current and future transport accessibility, connectivity and capacity; their location; and their contribution to place shaping the area.
- 6.16. The attraction of London is its variety of residential offer. High density does not have to mean high rise. High density schemes can offer opportunities to provide good

quality, attractive housing and ensure the most efficient use of land. However, proposals for higher densities (above the ranges in the London Plan density matrix) will need to be tested rigorously, taking account of Policy 3.4 of the 2011 London Plan and issues which are relevant to exceptionally high density development, including liveability, dwelling mix, design and quality.

Accessible Housing

- 6.17. To ensure residents requiring accessible housing lead independent and dignified lives, the Legacy Corporation requires all new homes to meet lifetime homes standards and at least 10% should be wheelchair accessible or easily adaptable for occupation. Useful guidance on how to achieve this is provided by the Mayor in his 2012 Housing SPG. In particular Annex 2 provides best practice guidance on wheelchair accessible housing and regard should be had to this when schemes are designed.

Policy H1: Housing Provision

The Legacy Corporation will seek to provide from a range of sources an annual net increase in additional homes exceeding 1,432 per annum in accordance with the Annual Average Housing Provision targets set out in the London Plan.

To ensure the protection and quality of neighbourhoods and homes, the Legacy Corporation will require

- new homes to be of an appropriate size and tenure which meets the housing needs of the area and those of London as a whole, including the need for family housing (3 or more bedrooms) across all tenures;
- homes which respond to the challenge of climate change and achieve the maximum viable standards of sustainable design and construction in line with HBE8 of the Local Plan.

Developments (including new build and conversions) will be permitted where the proposal:

- does not lead to the net loss of residential units (including affordable housing units), and does not result in the loss of land previously in residential use to other uses unless it is replaced by an equivalent or greater number of new homes that meet identified housing needs;
- Complies with the internal space standards set out in the London Plan Policy 3.5, achieves the maximum intensity of use compatible with the positive aspects of local context and character and the form and density takes account of the London Plan Sustainable Residential Quality (SRQ) Density Matrix;
- Ensure all new homes meet the lifetime homes standards and that 10% of the new homes are wheelchair accessible or easily adaptable for residents who are wheelchair users.
- Playspace is provided in accordance with the London Plan Policy 3.6
- Appropriate car parking and cycle parking to the nature of the development and location is provided in accordance with policy T3 of the Local Plan
- Provides adequate outdoor amenity space that complies with the following

minimum standards for dedicated amenity space, excluding footpaths, parking areas, access ways, side or front gardens for new build residential development:

- 10 sq ms for one and two bedroom dwellings;
- 15 sq ms for dwellings with three or more bedrooms.

Residential Development Principles including Alterations and extensions

- 6.18. The local context of the location and the quality of the residential environment is important. In accordance with the London Plan, residential development must be well designed in order to create a high amenity environment for residents and neighbours. It is equally important that additions and alterations are well designed to ensure that the character and quality of the area is maintained and enhanced where possible and the amenity of adjoining occupiers is protected.
- 6.19. It is not only the amenity of adjoining residents that are affected by design but also the health of occupants. Residential developments must also provide a good quality internal environment with adequate sunlight and daylight, outlook and privacy, allowing adequate, warmth, quiet, and space to move and carry out day to day activities within the home. The design of flats is particularly sensitive to layout, where the stacking of similar rooms, and adequacy of storage space can have a significant impact on the amenity of occupiers.
- 6.20. Rear extensions can also encroach onto useable amenity space, and may be detrimental to the character of an area, or impact on daylight or outlook of neighbouring properties. A rear garden space of at least 6m in depth is considered the minimum needed to provide sufficient amenity space as a sitting out area or modest playspace. It is important that the remaining garden space left after extension does not deviate significantly from the standards of amenity space set out in Policy H1.
- 6.21. Development on back gardens can also have a negative impact on other policy objectives including biodiversity and managing flood risk. The development of back gardens is therefore generally regarded as an inappropriate form of development in the Legacy Corporation area.

Policy H2: Residential Development Principles including Alterations and extensions

All development should:

- be of the highest quality design which demonstrates high levels of environmental awareness and contributes to mitigation of and be adapted to the effects of climate change;
- be based on an understanding of local characteristics, preserving or enhancing local character and respect the appearance, scale, mass, height and pattern of surrounding buildings, spaces and streets;
- ensure attractive, safe and, where appropriate, vibrant streets which provide visual interest, particularly at street level and avoid blank walls;

- create safe and secure environments and reduce opportunities for crime and minimise the fear of crime;
- be designed to allow for adequate daylight, sunlight, privacy and outlook for adjoining and potential occupiers and users;
- meet the highest standards of accessible and inclusive design.

Extensions and alterations to existing residential properties will be permitted where they are:

- well designed, uses materials appropriate to the original building;
- not so large that it dominates and competes with the original building;
- it is sympathetic to the style of the building, not visually intrusive and does not harm either the street scene or the building's appearance;
- side extensions do not cause a terrace effect by in-filling the spaces between detached or semi detached buildings.

Affordable housing

- 6.22. The definition of affordable housing has been amended following alterations to national planning policy guidance to include the 'Affordable Rent' product. 'Affordable Rent' allows for a higher proportion of delivery costs to be met by borrowing on future rental receipts and existing assets, supported by a rental model that collects higher amounts than conventional affordable housing by charging up to 80 per cent market rent. Focus has shifted from the use of the planning system to ensure availability at a cost low enough for households to afford to one based on eligibility criteria based on local incomes and house prices. As a result of this change and the recent outcome of the Revised Early Minor Alterations to the London Plan, the Legacy Corporation supports the provision of the social housing product 'Affordable Rent' in place of traditional social rented accommodation. Social Rented accommodation may be provided, however this should not be at the expense of maximising new affordable homes and any application for social rent should transparently and robustly justify this. The government has made it clear that affordable rent is intended to address similar types of need to traditional social housing.
- 6.23. In line with the London Plan, and identified need, a tenure split of 60% affordable rented accommodation and 40% intermediate housing is required for the Legacy Corporation area. The Legacy Corporation recognise that more needs to be done to help Londoner's get a first step on the market housing ladder and therefore a more balanced mix of tenures is necessary for the area.
- 6.24. A minimum benchmark target of 35% of affordable homes across the Legacy Corporation area will be sought. This target should help inform discussions on individual schemes. The target is the result of a rigorously testing exercise to determine the viability of delivering affordable housing across the Legacy Corporation area.

- 6.25. Consistent with the approach taken in the London Plan, the maximum reasonable amount of affordable housing will be sought on individual schemes. Developments should consider all the above in devising a scheme which achieves the requirement of the plan for maximising provision of affordable housing and the government's and Mayor of London's aspirations. In line with recent conclusions from the Revised Early Minor Alterations to the London Plan, the Legacy Corporation will not be setting rental caps on the 'affordable rented' homes in the Local Plan and will expect developers/ registered providers and the Legacy Corporation to agree on the proposed rental levels having provided the necessary evidence to support their offer, an offer which balances meeting local needs and maximising output.
- 6.26. All new affordable housing will be expected to include an element of 3 bed or larger family housing in line with the preference set out in the London Plan.

Policy H3: Affordable housing

The Legacy Corporation will seek to maximise the provision of affordable housing, with a target of at least 441 affordable homes per annum between 2013/14 and 2023/24, from all sources of supply. A mix of intermediate (40%) and affordable rent (60%) accommodation will be sought. Provision of social rented accommodation will be acceptable where it can be demonstrated that affordable housing provision from any one development scheme will not reduce its total potential provision of affordable housing.

The Legacy Corporation will seek:

- the maximum reasonable amount of affordable housing on individual sites, including mixed use schemes, with the capacity for ten or more units (gross), having regard to:
 - I. identified local and strategic housing needs,
 - II. the affordable housing target,
 - III. the need to encourage rather than constrain development
 - IV. the promotion of mixed and balanced communities,
 - V. the size and type of affordable housing needed in particular locations,
 - VI. individual circumstances of sites including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising viability of schemes prior to implementation, and other scheme requirements
- the maximum provision of affordable housing on-site. In exceptional circumstances provision of an equivalent amount of affordable housing on an alternative site will be considered; and where it is not possible to identify a deliverable alternative site, a financial contribution towards the delivery of an equivalent amount of affordable housing may be acceptable. In each case the amount of affordable housing, the mix of unit sizes and off-site provision of a financial contribution will be secured through a S106 Legal Agreement.
- Any proposed off- site provision of affordable housing will need to demonstrate that:
 - I. It does not prejudice the delivery of the affordable housing target;
 - II. That it would be delivered at no financial advantage to the applicant; and
 - III. The off-site affordable housing delivery is linked to the completion of the on-site market housing.

Specialist Housing needs

Older People Accommodation

- 6.27. Although London is generally a 'young' city, it is expected to experience substantial growth in the population of older people. Although this growth is likely to be predominantly an issue for Outer London, the creation of new communities in the Legacy Corporation area offers the opportunity to consider how the provision of older people accommodation can contribute to mixed and balanced communities and help release under occupied family housing back into the market.
- 6.28. Proposals for older people accommodation should recognise the range of housing options for older people and how the provision meets the complex needs of older people. The Mayor's Housing SPG 2012 provides detailed analysis and definitions of the range of options which can provide a useful understanding of the older people accommodation market. The Legacy Corporation will resist the loss of older people accommodation unless it can be robustly demonstrated that there is no current or future need for the accommodation or it is unsuitable for its use.

Student Accommodation

- 6.29. It is important that provision is made for new student accommodation close to their places of study in order to cater for existing and projected increases in demand. Planning policies need to take into account pressure for speculative student housing, where the developer has not partnered with an educational institution. If a scheme isn't partnered, affordable housing will be sought. This is also to avoid long term vacancies and student accommodation becoming vulnerable to redevelopment for more profitable housing uses.
- 6.30. Meeting the needs of students should not compromise the ability to provide housing for the Legacy Corporation community. Planning applications for student accommodation should be supported by robust assessments of need which take account of the range of local and strategic needs, including a consideration of what has received planning permission.

Gypsy and Traveller communities

- 6.31. Planning for the needs of Gypsy and Traveller communities in London requires a strategic partnership approach as part of meeting local needs. The scale of need and the availability of deliverable and suitable sites which satisfy the tests in Policy H4 is challenging. The Legacy Corporation has one existing temporary site containing 5 pitches which will be permanently designated. However, provision of new sites will require further work in partnership with neighbouring boroughs to identify opportunities for additional pitch provision.

Policy H4: Specialist Housing needs

- Existing specialist and supported housing, including sheltered housing, care homes and accommodation for older people (such as extra care accommodation, assisted living and retirement housing) will be protected where it is considered suitable for its use and meets the relevant standards for this form of accommodation
- Proposals for new specialist and supported housing including sheltered housing, care homes and accommodation for older people (such as extra care accommodation, assisted living and retirement housing) will be supported where

it meets relevant guidance for this form of accommodation and it can be demonstrated that there is a need for its use

- Development which would lead to a loss of hostel, staff accommodation and shared accommodation (including student housing) will not be permitted unless it is replaced within the new scheme to an equivalent or greater quantum and standard, or it can be demonstrated that the facility no longer caters for current or future needs.
- Proposals for development of student accommodation with no ownership or management arrangement in place with a recognised local educational establishment, and where otherwise acceptable, will be expected to contribute towards provision of affordable housing either on or off-site.
- Proposals for student accommodation should be supported by submission of a robust assessment of student accommodation need. Student accommodation developments which are considered to compromise the delivery of affordable and market housing will be resisted.
- The Legacy Corporation will work with neighbouring boroughs to assess and identify the long-term needs of Gypsies and Travellers within its own administrative area in the context of the four boroughs as a whole.
- Proposals for new site(s) for additional permanent facilities within the Legacy Corporation area to meet the long-term needs of Gypsies and Travellers will be required to have regard to:
 - I. the need for safe access to the road network;
 - II. the impact on the local environment and the character of the area, safety and amenity considerations;
 - III. the availability of essential services, such as water, sewerage, drainage and waste disposal;
 - IV. the proximity to shops, services and social and community facilities;
 - V. the need to avoid areas at high risk from flooding;
 - VI. Proximity to existing Gypsy and Traveller site.

Houses in Multiple Occupation (HMO's)

- 6.32. Houses in Multiple Occupation (HMO) are an important component of the housing market, providing an important supply of low cost housing to support housing needs and labour market flexibility in the capital and reduces the pressure on publicly provided affordable housing. The Legacy Corporation will seek to ensure that any new supply of HMO accommodation strikes a balance between meeting housing needs as well as supporting the Legacy Corporation's aspiration to provide family housing and high quality housing.
- 6.33. The quality of HMO accommodation can give rise to local concern. Therefore, new supply will be required to meet the relevant standards for HMOs. HMOs with five or more occupants and three storeys are subject to mandatory HMO licensing, and the owner/manager/landlord must now apply to the local housing authority for an HMO license.
- 6.34. Unlike surrounding boroughs, the Legacy Corporation has a limited existing supply of HMO accommodation. However, the Legacy Corporation will work with the Mayor

and neighbouring boroughs to ensure that appropriate action is taken to enforce against illegal conversions/developments including “beds in sheds”.

- 6.35. The Legacy Corporation will monitor the impact of the permitted development rights on the existing housing market area which allows the change of use of C3 accommodation to smaller HMO accommodation. If evidence suggests there has been a proliferation in the loss of family housing, the Legacy Corporation will consider introducing an Article 4 direction to remove this permitted development right.

Policy H5: Houses in Multiple Occupation (HMO's)

Proposals for Houses in Multiple Occupation (HMO's) that require planning permission development, will be required to demonstrate that they:

- meet a demonstrable need for the type of accommodation proposed,
- meet relevant housing standards for HMOs,
- do not have a harmful impact on the character and amenities of the surrounding area,
- easily accessible by public transport, cycling and walking, and
- do not prejudice the delivery of Use Class C3 housing within the Legacy Corporation area as a whole.⁵

Institutional investment in the Private Rented Sector

- 6.36. As the private rental sector becomes increasingly important in supporting labour market mobility and meeting the housing needs of those not able or not willing to buy into the housing market, the Legacy Corporation, despite limited scope to influence the provision of private rented accommodation through the planning system, will support its provision and work with the boroughs, the GLA and delivery partners to seek opportunities to encourage institutions to invest. Private rented accommodation is not ‘affordable housing’ as defined by the NPPF, it is considered to be market housing and is subject to all the other requirements in the plan.

Policy H6: Institutional investment in the Private Rented Sector

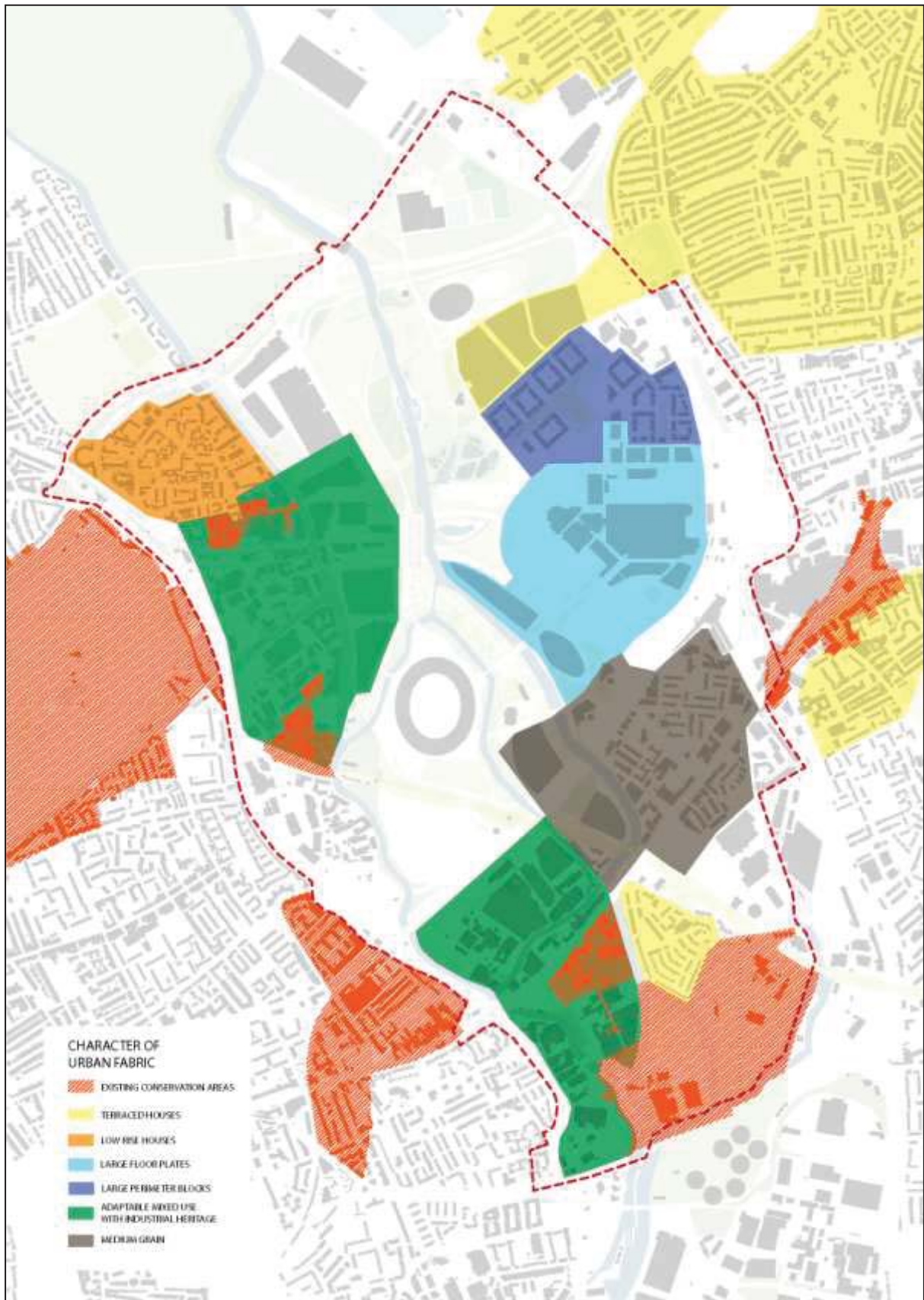
Institutional Investment which provides long term investment in the private rental sector will be supported by the Legacy Corporation where it meets the range of local and strategic housing needs. Such accommodation should provide good standards of accommodation; not result in loss of existing housing; and should meet all the other policies in this Plan, including the requirement to provide affordable housing.

⁵ Changes of use from general residential (C3) to smaller HMOs (C4) are permitted by the GPDO and apply where 3-6 unrelated adults share basic amenities such as a kitchen or bathroom. Planning permission is required where an HMO caters for 7 or more unrelated adults.

References and evidence base

- Mayor of London - London Plan, 2011
- Mayor of London, Revised Early Minor Alterations to the London Plan, 2013
- Mayor of London, Housing SPG, 2012
- 2013 London Strategic Housing Land Availability Assessment
- 2010 London Housing Design Guide
- Transport for London- Public Transport Accessibility Level (PTAL) scores
- London Borough of Hackney Core Strategy, 2010
- London Borough of Tower Hamlets Core Strategy, 2010
- London Borough of Newham Core Strategy, 2012
- London Borough of Waltham Forest Core Strategy, 2012
- ORS, Assessing the Legacy Corporation's Housing Needs, Report of Findings, October 2013 (draft)
- GLA London SHMA, 2008
- East London Housing Market Area SHMA, 2010
- London Borough of Newham Strategic Housing Market Assessment, ORS, 2009
- London Borough of Tower Hamlets Strategic Housing Market Assessment, DCA, 2009
- London Borough of Waltham Forest Strategic Housing Market Assessment. ORS, 2011/12

7. Historic and Built Environment



- 7.1. The Historic and Built Environment within the Legacy Corporation area forms part of the wider urban context within the Lower Lea Valley and East London as a whole. This urban context has undergone a dramatic transformation in recent years, with traditional industrial buildings and infrastructure being replaced by both Stratford City and the Olympic Park. The challenge for the Legacy Corporation is to ensure that future developments within its area continue to respond to the historic elements that remain, and draw upon the landscape features that have defined this area for so many years. The focus of change has now naturally shifted towards the areas that surround the Queen Elizabeth Olympic Park, in particular the importance of integrating these with the park itself, and drawing upon the opportunities for physical regeneration that the Olympic Games has provided. As the urban structure of these 'fringe' areas is still yet to be defined, the Legacy Corporation must ensure that change to their physical form and appearance respects rather than replaces those features of historic value that are worthy of protection and preservation.
- 7.2. The Legacy Corporation considers design as fundamental to good planning, and for that reason will expect to see the foremost standard of design embedded within the proposals for new development it receives. It is important that applications go beyond aesthetic considerations and demonstrate an inherent understanding of how new places can contribute to the wider functionality and surrounding context of the recently reopened Queen Elizabeth Olympic Park.
- 7.3. The Legacy Corporation will deliver a high quality historic and built environment that reinforces local identity and each sub-area's distinct sense of place.

Local Plan Objectives:

OBJECTIVE 6, Urban Design & Design Quality: Achieve an excellent quality of design for new buildings and within the wider urban landscape, including streets and public spaces and other open spaces, maintaining and, where necessary, improving the quality of those spaces, with a focus on the character of the location and its integration and connections with its surroundings.

OBJECTIVE 7, Creating Inclusive Places: Seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.

OBJECTIVE 8, Creating Neighbourhoods: To expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

OBJECTIVE 9, Area Characters and the Historic Environment: To create a new piece of London comprising of distinctive neighbourhoods, which draw upon the existing character of established areas, including their cultural assets, and respect the historic aspects of the built environment, particularly where there are conservation areas, and nationally and locally listed buildings.

Strategic Policy SP.3: The Built Environment

The Legacy Corporation will seek to ensure that the built environment within the Legacy Corporation area is well designed; creates high quality places and supports development that contributes to making places better for people. This includes the design of individual buildings, public and private spaces, and larger development projects which are new or subject to refurbishment or change.

Strategic Policy SP.4: The Historic Environment

The Legacy Corporation will seek to ensure that the historic environment within its area is conserved and enhanced through a positive strategy that promotes the wider social, cultural and economic benefits that conservation of the historic environment can bring. This should sustain and promote the significance of Designated Heritage Assets (Conservation Areas and Listed Buildings) and other non-designated heritage assets by encouraging viable uses consistent with their conservation and potential for heritage-led regeneration.

Designating Protected Views

- 7.4. Within the Legacy Corporation Area there are a number of desirable views, vistas and sightlines that could warrant protection through local planning policy. The Legacy Corporation will undertake surveys to determine whether any of these views should be designated as 'protected' within the Local Plan, and if so outline the reasons why. All types of view will be considered, especially those of a narrow, linear nature, within a townscape setting. If a planning application is submitted that could affect a designated view the proposal should be accompanied by an analysis that explains, evaluates and justifies the visual impact upon the view in question. A number of 'views' that may warrant protection have been identified in Figure 7.3.

Policy HBE.1: Designating Protected Views

The Legacy Corporation will identify and designate protected views when a vista, sight line or viewing corridor justifies such status because the landmarks framed by it, or the special architectural or historic interest captured within it, warrants protection.

New development must make a positive contribution to the characteristics and composition of these protected views.

Inclusive Design

- 7.5. The Legacy Corporation is committed to carrying forward the significant accessibility and inclusive design work that was undertaken in delivering the Olympic Park and its supporting infrastructure. It is the Legacy Corporations aim that development within its area creates wholly inclusive 'Lifetime' neighbourhoods that can be enjoyed by everyone regardless of disability, age, gender, sexual orientation, race or faith. In order to achieve this the Legacy Corporation has developed its own standards that

set the benchmark for Inclusive Design. Although these standards may not be applicable in all circumstances, the Corporation will nevertheless expect applicants to take them into consideration when formulating their proposals.

<http://www.londonlegacy.co.uk/media/LLDC-Inclusive-Design-Standards-March-2013.pdf>

Policy HBE.2: Inclusive Design

The Legacy Corporation will require that new development responds to the needs of all users, and provides an accessible and inclusive environment that incorporates the Corporation's inclusive design standards.

Applicants must reference these standards within their Design and Access Statements in order to demonstrate how these principles have been reflected within their application.

The Legacy Corporation expects proposals to integrate the highest standards of inclusive design in order to deliver more usable and openly accessible urban environments.

Designating Conservation Areas

- 7.6. The Legacy Corporation, as the Local Planning Authority for its area, is able to protect the character and appearance of land and buildings that it deems to exhibit a level of special architectural or historic interest meriting Conservation Area designation. The Legacy Corporation will look to identify potential future designations, and clearly articulate the nature of the 'special' interest through supporting evidence - specifically Conservation Area Appraisals. The Legacy Corporation may also designate Conservation Areas to protect those 'natural' heritage assets whose character and appearance is intrinsically linked to the wider historic context of which they form part.

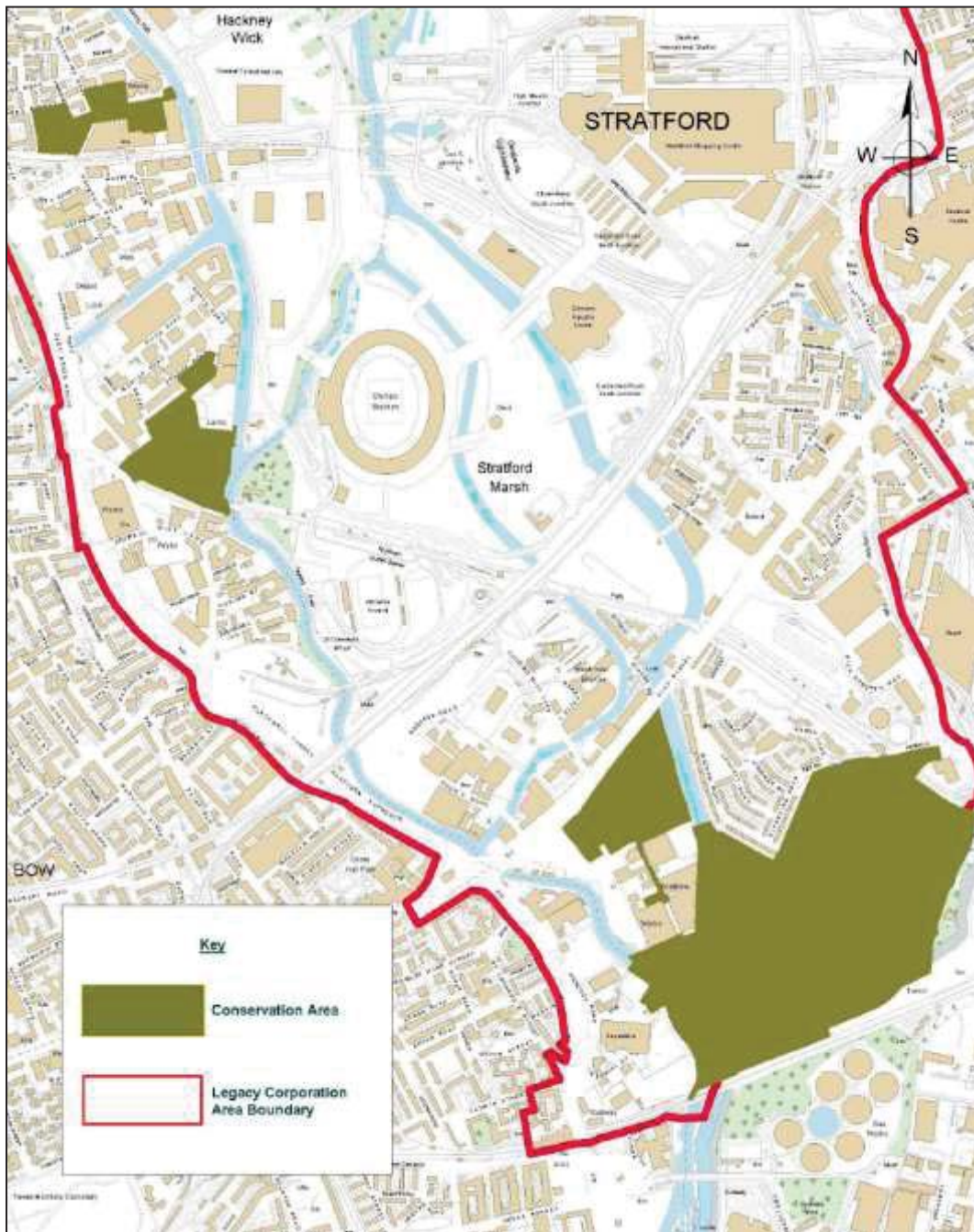
Policy HBE.3: Designating Conservation Areas

The Legacy Corporation will identify and designate new Conservation Areas when an area justifies such status because of its special architectural or historic interest; and or exhibits a character or appearance that is desirable to preserve or enhance.

The Legacy Corporation will undertake surveys to determine whether areas within its boundary warrant designation, and if so define what constitutes their special architectural and historic interest through a Conservation Area Appraisal.

To guide this process the revised version of 'Understanding Place: Conservation Area Designation, Appraisal and Management' (English Heritage) will be followed.

Figure 7.1: Existing Conservation Areas



Local Listing

- 7.7. Whilst there are a number of statutorily listed buildings and structures within the Legacy Corporation area; there are also a number of other buildings of 'Local Interest' that have been identified by the Boroughs and which now fall within the Legacy Corporation area. These buildings fall below the benchmark for statutory listing, and have been identified as either 'Locally Listed Buildings' or 'Buildings of Townscape Merit/Importance'.
- 7.8. The Legacy Corporation will locally list the buildings that already fall within these categories, and also locally list any other heritage assets (including further buildings) that it deems to be of sufficient significance to warrant this protection. New

development should not harm the character, appearance or setting of these buildings; in line with a general presumption against their demolition. If an applicant wishes to demolish a locally listed building a reasoned justification must be provided.

Policy HBE.4: Local Listing

The Legacy Corporation will locally list those heritage assets that have a degree of significance which merits consideration in planning decisions.

Assessing the significance of heritage assets will be based around an understanding of an assets age, rarity, historic association and value - (either evidential, aesthetic, group, social or communal).

The suitability of any given building, monument, site or landscape for local listing will be measured through the selection criteria identified in the English Heritage 'Good Practice Guide for Local Heritage Listing', (2012).

Archaeology

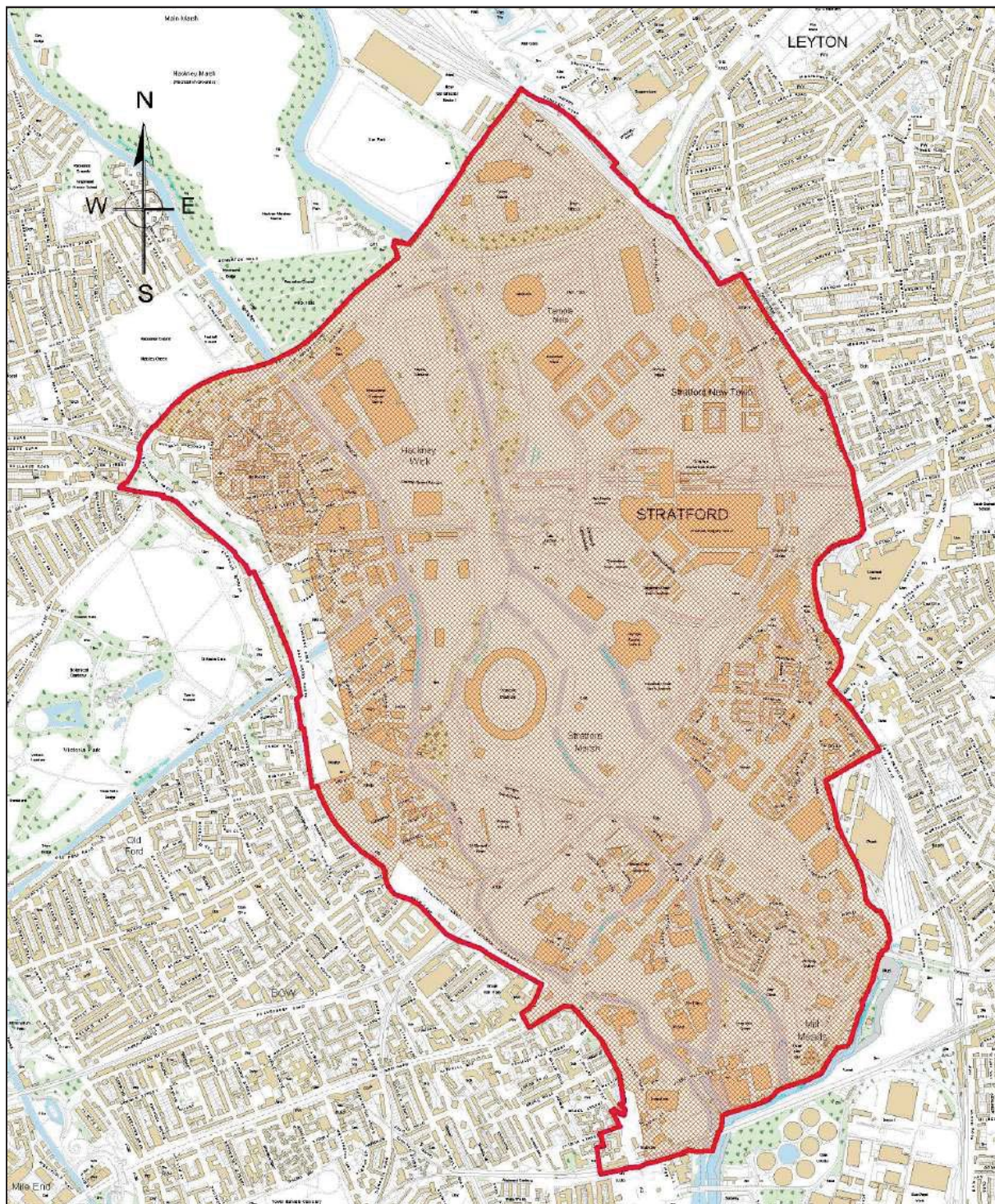
- 7.9. The Legacy Corporation Area is covered by a number of Archaeological Priority Areas/Zones that have been established on the advice of English Heritage. These areas may contain archaeological evidence or remains that require protection under planning policy. Further areas may be designated on the instruction of English Heritage.

Policy HBE.5: Archaeology

Where development is proposed on a site that includes or has the potential to include archaeological interest, the Legacy Corporation will require applicants to provide a desk-based assessment, and where required, a field evaluation.

The level of investigation deemed necessary will be dependent on the significance of the archaeological interest in question.

Figure 7.2: Areas covered by borough Archaeological Protection Areas



Local Identity

7.10. The Legacy Corporation proposes a singular 'Local Identity' policy that comprehensively addresses the aspects of the historic and built environment that the Legacy Corporation considers most important to delivering the quality of development that will be expected for its area. The policy is founded upon an understanding and evaluation of the area's defining characteristics, and will form the parameters within which all proposals for new development will be considered. The

Legacy Corporation deems that this is a robust and sound approach to follow, given that the requirements of the policy are overarching and equally applicable to both contemporary and historic settings (including Conservation Areas), proposals for taller buildings, applications affecting listed buildings, and general urban design.

- 7.11. Applicants should also adhere to the Legacy Corporations 'Design Quality' Guidance (September, 2012).

Policy HBE.6: Local Identity

For each of the Sub Areas, the Legacy Corporation will seek to reinforce and promote local identity and a distinct sense of place through the management of growth and change in accordance with the principles outlined below.

Design of new development should be appropriate to its context in terms of:

Connectivity: Ensuring that the layout of new and existing places connects with the existing route network, and in a way that facilitates movement along direct, permeable, safe and legible pedestrian and cycle routes. Routes should cater to the requirements of all users equally. Opportunities to connect areas to strategic road, rail and bus networks should be promoted where appropriate.

Architectural Context: Responding to the architectural setting within which the development is proposed, and seeking to improve or enhance this as appropriate. Careful consideration should be given to architectural style, materials, fenestration, colour, building orientation and overall appearance.

Urban Fabric: Respecting existing urban typologies; drawing design cues from the morphology of the area in terms of form, scale (height and massing), and grain. Applications will be assessed against the 'Guidance on tall buildings', issued by CABI/English Heritage (2007).

Mix: Selecting a mix of uses that compliment current functions, and which demonstrate an understanding of how receptive and resilient an area is to change. Particular attention should be given to how proposed uses will integrate with, and relate to, both public and private space.

Landscape and Water: Relating to the local area's defining natural landscape features, engaging with the linear form of both the parklands and waterways where possible.

Infrastructure: Utilising 'hard' infrastructure, and drawing upon any opportunities to utilise this for positive effect; helping to overcome the potential barriers to integration that infrastructure creates, and creating new links and routes where possible.

Sustainable Design and Construction and the Energy Hierarchy

- 7.12. The Legacy Corporation places great importance on incorporating pioneering measures of sustainable design and construction that are in accordance with the principles of the energy hierarchy. Delivering urban regeneration that is environmentally, as well as economically beneficial, goes to the heart of the Legacy Corporation's long-term aspirations for its area. The Olympic Games set the benchmark of sustainability, and new development should learn from these

successes and promote the use of green initiatives and technologies that move the Legacy Corporation area towards a zero-carbon condition. The policies outlined below respond directly to the environmental and climatic challenges facing the UK, and promote the adoption of more sustainable lifestyles that are in keeping with the low-carbon and resource-efficient demands that are being placed upon our society.

- 7.13. The Legacy Corporation expects new development to inspire higher standards of construction that provide a catalyst for sustainable ways of living which protect the environment, boost the economy, and enhance the area's already vibrant and diverse community.
- 7.14. The Legacy Corporation is at this time proposing a set of policies that are London Plan compliant, whilst acknowledging that this policy position may change given the 'Housing Standards Review' issued by the Department for Communities and Local Government in August 2013. Within this the Government proposes that all housing standards relating to the technical or functional performance of a building should relate solely to Building Regulations, and be no longer set through either national or local planning policy. The Legacy Corporation will review this position before preparing the next stage of its Local Plan.

Policy HBE.7: Energy Hierarchy

Developments will be expected to minimise carbon dioxide emissions to the fullest extent by:

Reducing energy requirements;
Supplying the energy that is required more efficiently;
Meeting those requirements through renewable energy sources where possible.

Reducing Energy Requirements:

The Legacy Corporation will expect major development proposals to meet the regulated carbon dioxide standards outlined within the London Plan. These are as follows for residential buildings:

2015-2016: 40% improvement on the 2010 Building Regulations Target Emission Rate.

Zero carbon from 2016 onwards (accounting for permitted allowable solutions)

Non-domestic proposals should achieve a 40% improvement up to 2016, meet Building regulation requirements from 2016-19, and be zero carbon from 2019 onwards. These targets must be met on-site unless it can be demonstrated that this is either unfeasible or unviable. In such cases where there is a shortfall the developer will be expected to make a financial contribution to the Legacy Corporation's carbon dioxide off-setting fund at the rate of £46 per tonne of carbon dioxide. This will be used to deliver carbon savings through local carbon reduction projects; and until such time that this is superseded by a nationally recognised approach.

Emission reduction is the first stage of the Energy Hierarchy. Policy HBE.8 (Sustainable Design and Construction) outlines the key considerations at this stage. The targets outlined above are minimum targets, and the expectation is that these will be surpassed where possible.

Major applications will be expected to provide an Energy Statement that explores whether these targets can be exceeded, and further information outlining how and from where energy will be supplied. Energy statements must contain the necessary information identified within the London Plan and be prepared in accordance with Appendix D of the adopted supplementary planning guidance on Sustainable Design and Construction.

Major development proposals should select other energy systems in accordance with the London Plan hierarchy. The London Heat Map tool should be used as a means to assess site specific opportunities. Please see Policy IN.2 within the Infrastructure Chapter for further information.

Policy HBE.8: Sustainable Design and Construction

The Legacy Corporation will require new development to incorporate the highest standards of sustainability and design. Consideration should be given to the following:

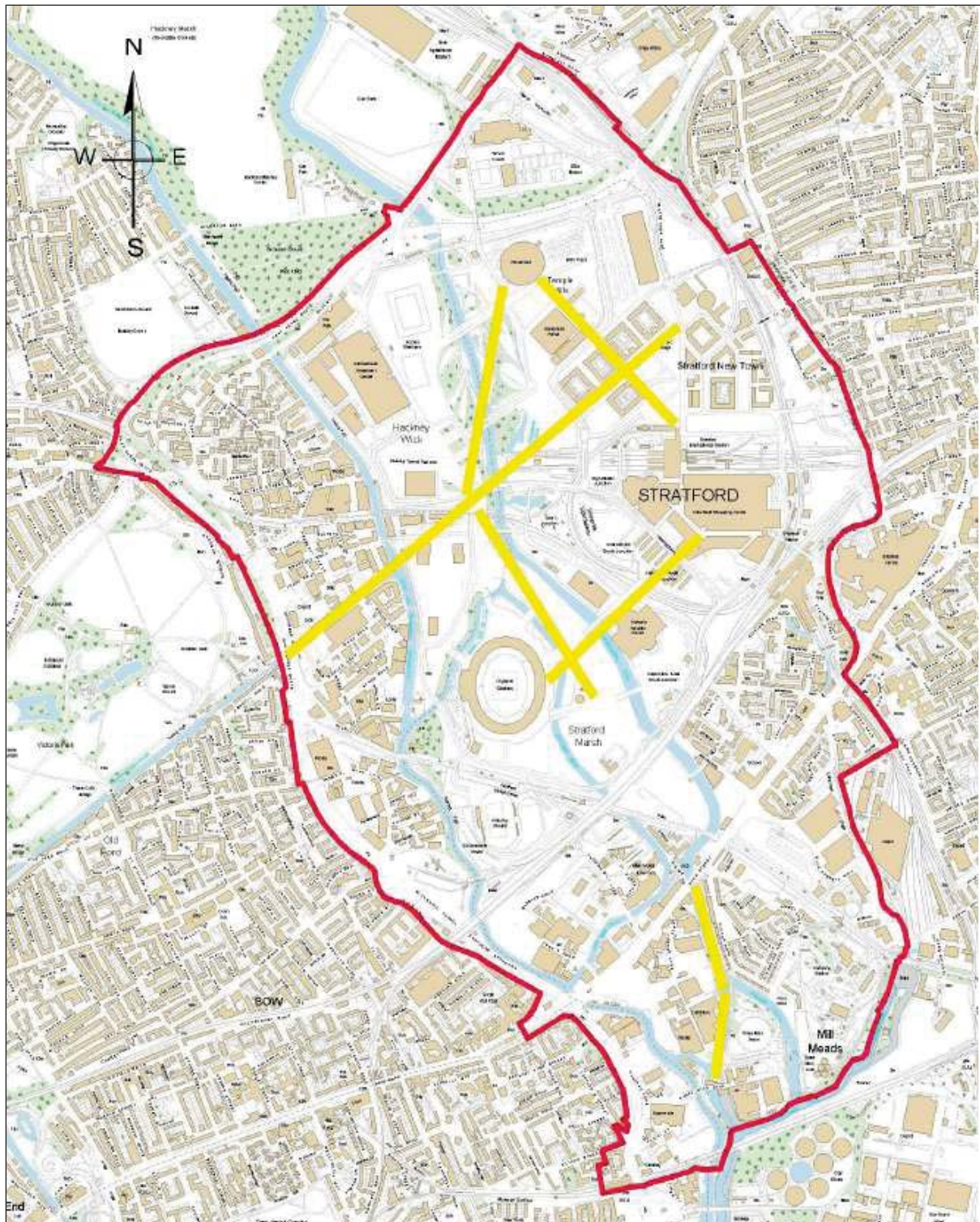
- Resource efficiency;
- Carbon dioxide emissions;
- Site layout, building footprint and orientation;
- Natural heating and ventilation;
- Decentralised energy;
- Utilisation of on-site/off-site renewable and low and zero-carbon energy sources;
- Living roofs;
- Sustainable Urban Drainage Systems (SUDS).

Applicants will have to demonstrate through Energy and Design and Access statements how the above considerations have been addressed. Residential proposals will be expected to meet the requirements outlined within Appendix 4 of the Mayors draft Sustainable Design and Construction SPG. Proposals must also achieve the level of the Code for Sustainable Homes (or any nationally recognised equivalent) required by the Government at the time of submission.

Non-domestic proposals should be assessed against the Building Research Establishment Environmental Assessment Method (BREEAM) and achieve maximum water credits and an overall rating of 'very good'.

Maps:

Figure 7.3: Potential Protected Views



References and evidence base

- National Planning Policy Framework (Communities and Local Government, 2012)
- Housing Standards Review Consultation (Communities and Local Government, 2013)
- Good Practice Guide for Local Heritage Listing (English Heritage, 2012).
- Guidance on tall buildings (CABE/English Heritage, 2007).
- Understanding Place: Conservation Area Designation, Appraisal and Management (English Heritage, 2011)
- London Plan (Greater London Authority, 2011)
- Draft supplementary planning guidance on Sustainable Design and Construction (Greater London Authority, 2013)
- Sustainable Design and Construction Supplementary Planning Guidance (Greater London Authority, 2006)
- London View Management Framework Supplementary Planning Guidance (Greater London Authority, 2012)
- Olympic Legacy Supplementary Planning Guidance (Greater London Authority, 2012)
- Legacy Communities Scheme Offset Solutions Study (London Legacy Development Corporation, 2013)
- Inclusive Design Standards (London Legacy Development Corporation, 2013)
- Design Quality Policy (London Legacy Development Corporation, 2013)

8. Infrastructure

- 8.1. The vision and objectives for the Legacy Corporation set out earlier in this Plan identify both the amount of change and growth that is considered possible and desirable and the general form that this growth and change should take. Much but not all of the Legacy Corporation area has seen significant investment in the infrastructure considered necessary to support this proposed change and to help this change meet the wider objectives of 'Convergence' set out in the Growth Boroughs Strategic Regeneration Framework.
- 8.2. A range of additional infrastructure will be needed in order to accommodate the planned level of growth and an Infrastructure Delivery Plan (IDP) has been prepared by the Legacy Corporation to identify what that infrastructure is and to help plan for its timely delivery. The IDP is not directly a part of this Plan, although the key infrastructure elements required within the area are identified in the local plan, mainly within its Sub Area sections. The IDP will be subjected to annual review, which will be carried out in consultation with stakeholders, in order to keep it up to date and relevant throughout the lifetime of this plan.
- 8.3. Infrastructure has a wide definition and can range from energy infrastructure, roads and bridges, transport and communications networks to health facilities, libraries, community centres and schools. Some of this infrastructure can only be provided directly within the Legacy Corporation area but some elements also form part of wider networks, which reach across London as a whole and sometimes beyond. Local infrastructure may be best delivered wholly or partly outside of the Legacy Corporation area, where it can be demonstrated that it helps to meet the needs generated by the growth within it. Working in partnership with infrastructure providers, including the Growth Boroughs will be an essential part of securing infrastructure delivery.
- 8.4. The planning process has a role in securing elements of new infrastructure, with the main tools available being planning obligations secured through S106 Agreements and the Community Infrastructure Levy (CIL). The Legacy Corporation is preparing its own CIL Charge which it intends to operate alongside the Mayor of London's London-wide CIL. It will also be producing separate guidance on its approach to implementation of its CIL and its use of S106 Legal Agreements. The Delivery and Implementation section of this plan provides more information on how CIL and section 106 agreements will be used to help implement the plan.
- 8.5. This section of the Plan does not set out a comprehensive approach to infrastructure but rather includes those policies which specifically apply to infrastructure and the delivery of infrastructure that are not included elsewhere in this Plan.

Strategic Policy SP5: Infrastructure to Support Growth and Convergence

The Legacy Corporation will work with its partners to seek to deliver the infrastructure necessary to support the growth and development identified within this Plan and the contribution that this growth can make to achieving the objectives of the Convergence agenda. In doing so it will produce an Infrastructure Delivery Plan that will be reviewed and, where necessary updated annually, in consultation with infrastructure providers and stakeholders.

The Legacy Corporation will prepare a Community Infrastructure Levy, which once implemented, will provide monies to apply to the delivery of the infrastructure

included within its CIL Regulation 123 list. Where appropriate, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations through S106 Legal Agreements. A Supplementary Planning Document will be produced to provide guidance on the operation and application of the Community Infrastructure Levy and S106 Legal Agreements.

New and Existing Community Infrastructure

- 8.6. While a significant amount of new development is planned for the Legacy Corporation area, this is predominantly in the form of large scale development schemes that already have a planning permission, with each of these schemes making provision for future community facilities and uses. There are also existing facilities, including those associated with schools within Hackney Wick and the Greater Carpenters area. With the significant level of population growth predicted and the need to ensure that new and existing communities have access to places where they can meet and where community activities can take place, these existing and new facilities are essential for long-term community development in the Legacy Corporation area. As such facilities will also generally be available for use by residents in the wider surrounding communities, these facilities will also play a part in a wider integration of communities in this part of east London, particularly as improved connections provide greater access and permeability across the Lower Lea Valley. As a result it is important that community facilities are protected in a way that is flexible enough that allows community uses to change and develop over time.

Policy IN.1: New and Existing Community Infrastructure

The Legacy Corporation will encourage the provision of new community infrastructure as part of new large scale development. Where it is proposed to redevelop a site containing an existing community facility, falling within Use Class D1, this facility should be reprovided within or close to the proposal site in a form and size that as a minimum allows the existing community uses to continue. The loss of an existing community facility will only be permitted where:

- It can be demonstrated that an alternative community use will be provided within or close to the site of the existing through submission of a relevant planning application;
- Or where it can be demonstrated that no viable alternative community use can be delivered on site in place of the original facility, including a consideration of the viability of a smaller scale of use;
- Or it can be demonstrated that the site is no-longer required as a result of the provision of new community facilities serving the same communities or is subject to a programme of rationalisation of community facility provision that maintains an equivalent level of provision for the communities served by the original facility.

Energy Infrastructure and heat networks

- 8.7. Capacity within the electricity network for the wider part of East London within which the Legacy Corporation area sits, has been identified as having a limited additional capacity for absorbing significant levels of growth. However, this is counter balanced by the legal requirement for operators to ensure that supply is available to meet the requirements of new development. A similar obligation applies to the supply of gas, while the Infrastructure Delivery Plan suggests that the capacity of the gas network is sufficient to meet the needs of growth.
- 8.8. The demands for power from new development should also be seen in the context of the heat network that currently serves the Queen Elizabeth Olympic Park area and Stratford City area, fed from two combined heating and power plants which together have significant capacity for expansion beyond their immediate networks, and also the proposals for a London Thames Gateway Heat Network which would run through and from south-eastern Newham to Tower Hamlets in the west and Stratford in the north-west, with the potential to be further extended to join the existing Stratford Network. A Local Development Order has been made by London Borough of Newham which permits the installation of heat network pipes between Beckton and the Greenway at West Ham where the route would pass into the Legacy Corporation area. The Legacy Corporation supports extension of the existing and provision of new heat network infrastructure within its area and beyond and, where possible, will work with partner organisations to seek delivery of these networks and encourage new and existing development to take advantage of the resulting heating, power and cooling networks, where this is practical and available.

Policy IN.2: Energy Infrastructure and heat networks

The Legacy Corporation will support proposals to provide new energy infrastructure to meet the future energy demands generated within its area where these are consistent with the Carbon reduction and other policies within this Plan (HBE7 and HBE8).

Proposals for new heat networks or extension to any existing heat network, or for renewable energy infrastructure, to serve development within or outside the Legacy Corporation will be supported subject to the other policies in this Plan. Proposals for new development, including new bridges, will be required to demonstrate that provision is included to accommodate utilities networks, including heat network pipes.

Water Supply and Sewerage Infrastructure

- 8.9. Water supply infrastructure within London is supplied, provided and operated on a London-wide basis. Thames Water aims to reduce the current residential demand of approximately 160 litres per day per person to 135 litres per day by 2035 (Thames Water Resources Management Plan 2010-2035). London Plan Policy 5.15 Water Use and Supplies, seeks to minimise the use of mains water including the introduction of additional sustainable water resources, including the use of rainwater harvesting and use of dual potable and grey water recycling systems. It seeks the incorporation of water saving measures and equipment in new development. It also seeks to achieve residential development that meets a target of 105 litres per head per day. Measures to achieve this level of reduction have been pursued in particular for significant development schemes within the Legacy Corporation area, with the

Legacy Corporation's Legacy Communities Scheme including a requirement to achieve this target.

- 8.10. Thames Water are operating an experimental Water Recycling Plant within the Legacy Corporation Area at Old Ford, which takes water from the sewage network and cleans this to a standard suitable for use within a non-potable water network that has been installed within the Queen Elizabeth Olympic Park. If successful, this has the potential to continue supplying non-potable water beyond the initial project timeline.
- 8.11. Significant investment in new sewage infrastructure within the Queen Elizabeth Olympic Park had been made, however, it is likely that new development proposals in other locations will need to contribute towards local improvements and new infrastructure to ensure adequate local capacity. The Lower Lea Valley as a whole as with much of London, has a combined foul and surface water drainage system with potential to regularly overflow into relevant watercourses and reduce water quality. The new Lee Tunnel is designed to relieve the combined surface and foul water drainage overflows from Abbey Mills pumping station as part of a wider programme to meet the requirements of the European Water Framework Directive. The Lee Tunnel project is expected to be complete by 2015. The Thames Tideway Tunnel project is planned to relieve combined stormwater overflows along the River Thames in London as a whole and will join the Lee Tunnel system at Abbey Mills.

Policy IN.3: Water Supply and Sewerage Infrastructure

The Legacy Corporation supports implementation of strategic programmes and proposals to manage water supply and to implement improved sewerage infrastructure, including the Lee Tunnel and Thames Tideway Tunnel. It will also encourage localised and building specific measures to reduce potable water demand and use, use of rainwater harvesting and greywater recycling systems among other measures to reduce domestic water use to 105 litres a head per day or less.

The Legacy Corporation will work in partnership with Thames Water to explore the long-term feasibility of the Old Ford Water Recycling Plant and Non-potable water network beyond its research stage.

Proposals for development will be expected to demonstrate that they maximise opportunities to reduce water demand and use and where feasible and viable, to 105 litres per head per day or less for domestic use for new development.

Waste Management

- 8.12. The London Plan Policy 5.16 sets out the Mayor's intention to work towards waste self-sufficiency within London, with a target of achieving zero waste to land fill by 2031. London Plan Policy 5.17 Waste Capacity sets out an intention to identify new waste capacity within London, while also setting out the criteria against which planning applications for new waste facilities should be assessed. The Legacy Corporation will rely on these policies for its overall strategy towards waste and in its consideration of proposals for development in its role as a local planning authority.
- 8.13. Actual waste management within the Legacy Corporation is carried out by three different waste authorities, with Newham belonging to the East London Waste

Authority, Hackney and Waltham Forest to the North London Waste Authority, while Tower Hamlets is its own waste authority. The East London Waste Authority boroughs have produced and adopted a Joint Waste DPD, while the North London Waste Authority is in the process of preparing one.

- 8.14. There is only one licensed waste management site within the Legacy Corporation area at Hepscoot Road in Fish Island. The planning context for this site is addressed in detail in the Sub Area 1, Hackney Wick and Fish Island, section of this Plan. London Plan Policy 5.17 (H) makes it clear that any existing waste management site should not be lost to a non-waste use unless replaced with an additional compensatory site capable of meeting the maximum throughput of waste that the existing site would have achieved.

Policy IN.4: Waste Management

In carrying out its function as a local planning authority, the Legacy Corporation will have regard to the adopted waste plans and policies of the three waste authorities within its area.

Proposals that would result in the loss of an existing waste management facility will only be permitted where it can be demonstrated that an additional waste management site has been secured which will meet the maximum waste throughput that the existing site is capable of achieving, that the site is capable of serving the same waste management need of the existing site and that the new site is within the same waste authority area as the existing or that it can be demonstrated that there is no overall loss of waste throughput capacity within that waste authority area as a whole.

Proposals for new waste management facilities within the Legacy Corporation area will be acceptable where they are within Strategic Industrial Locations (SIL) which are identified as Preferred Industrial Locations (PIL) and do not compromise or otherwise make unviable the existing employment or transport functions of that SIL location. Proposals for new waste management facilities should demonstrate that their design and operation do not adversely affect the amenity of the proposed location.

Proposals for all development should demonstrate that adequate provision has been made for domestic and commercial waste storage and collection and allows for a range of future collection options, including separate collections of general waste, recyclable materials and other waste streams.

References and evidence base

- Legacy Development Corporation Infrastructure Delivery Plan Study Report, URS, 2013
- Joint East London Waste Plan, London Borough's of Barking & Dagenham, Havering, Newham and Redbridge, November 2011
- The Mayor's Waste Management Strategies, 2011
- Thames Water Resources Management Plan 2010-2035
- Lee Tunnel Planning Applications, Thames Water 2008/9

- Thames Tideway Tunnel Nationally Significant Infrastructure Planning Application, 2013
- Strategic Regeneration Framework, Growth Boroughs, 2009 (reviewed 2011)
- The Mayor's Climate Change Mitigation and Energy Strategy, 2011

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9. Natural Environment



- 9.1. The natural environment within the Legacy Corporation area forms part of a wider context within the Lower Lea Valley and East London as a whole, forming part of the All London Green Grid and Blue Ribbon Network and providing the basis for a 'blue' and 'green' corridor that runs through the Legacy Corporation area. Approximately 20% of the Legacy Corporation area is comprised of Lee Valley Regional Park Authority open space. Significant progress has been made in cleaning up and restoring the waterways and open spaces within the area and creating new open space and parklands, in particular through the delivery of the Queen Elizabeth Olympic Park. The significant range of regeneration and development opportunities within the wider area also present the opportunity to clean up land contamination, improve access to the natural environment, further improve the waterways and introduce new elements of open space, which can contribute to the wider natural networks that run through the Lea Valley to the River Thames.
- 9.2. The waterway and open space networks also provide a significant resource that, where of sufficiently high quality, will enable the achievement of a liveable environment that will be able to contribute to the quality of life experienced by those who live within, work in or visit the area and provide a context for the level of housing and economic growth identified in this plan.

Local Plan Objectives

OBJECTIVE 5, Health Culture and wellbeing, seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games and a strong sense of cultural wellbeing through participation in recreation, creative and cultural activities.

OBJECTIVE 7, Creating inclusive places: seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.

OBJECTIVE 10, Sustainability: to draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.

OBJECTIVE 12, Open space and biodiversity: using the open space, waterways and biodiversity legacy of the Queen Elizabeth Olympic Park to tie the area effectively into the London Green and Blue Grids, protecting and seeking enhancement of identified locations.

Strategic Policy SP6: The Natural Environment

The Legacy Corporation will work with its partners and seek to ensure that the natural environment within the Legacy Corporation area is protected and enhanced to ensure that growth takes place within the context of a high quality environment, contributing to positive outcomes for health and well-being, while achieving an effective series of Green Grid and Blue Ribbon networks within and through the Legacy Corporation area and within the wider context of the Lea Valley and East London.

Cross Cutting Policies

Policy NE1: Integrating the built and natural environment

In implementing this plan, the Legacy Corporation will seek to achieve integration between the natural and the built environment in order to maximise the extent habitat within its area.

Proposals for development will be required to demonstrate that they integrate with the natural environment by maximising the provision of habitat and of species identified within the relevant Biodiversity Action Plans, integrated within buildings, other built structures, within streets and areas of open space.

Policy NE2: The natural environment and Health and Well-being

In implementing this plan, the Legacy Corporation will seek to maximise the opportunities provided by the natural environment to maximise the health and wellbeing of its existing and future residents, including appropriate, easy and safe access for all to open space and waterway environments. Proposals for development will be required to demonstrate that they maximise opportunities for access within the scheme and for access to open spaces and waterway environment elsewhere.

The Waterways

- 9.3. The waterways are a defining feature of the Legacy Corporation area, a key component of its character, providing the setting for many of the places and communities that already exist or will come into being during the lifetime of this plan, while functioning on a range of levels from drainage to transport, providing a significant habitat and biodiversity corridor that also fulfils an important flood management role. The waterways within the area also form part of the London Blue Ribbon Network, London's strategic network of waterways, identified in the London Plan (2011). Figure 9.1 shows the waterways that run through the Legacy Corporation area. This policy should be read in conjunction with Policy T9.

Policy NE3: The Waterways

The Legacy Corporation will seek to maintain and where necessary enhance the role of the watercourses within its administrative area. It will seek to balance the use and natural functions of the watercourses by seeking to:

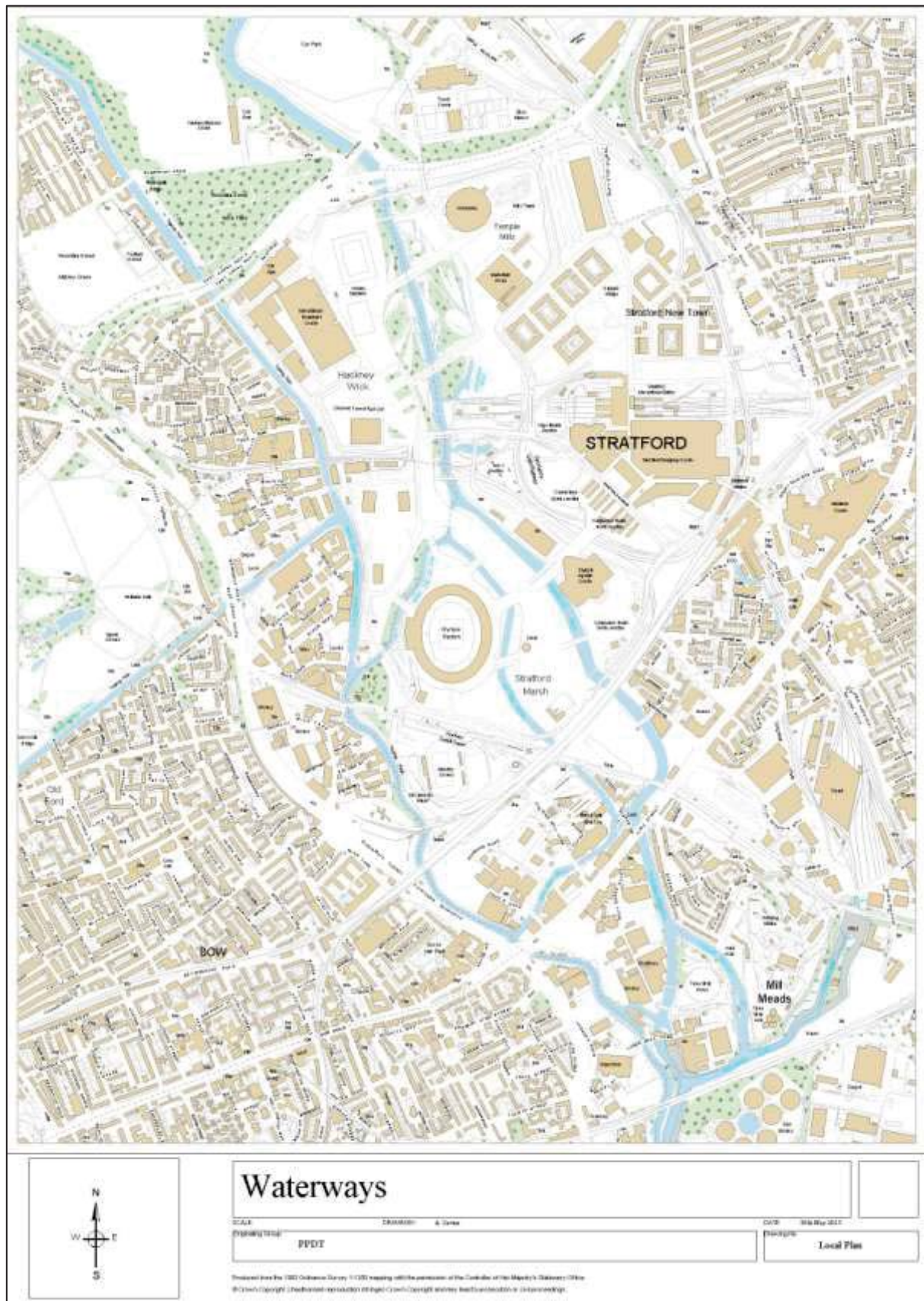
- maximise opportunities for movement of passengers and freight;
- maximise opportunities for appropriate leisure uses;
- protect and enhance the role of the waterways for biodiversity drainage and management of flood risk.

Development proposals that affect the waterways should demonstrate that they maximise these opportunities. Development proposals that would have an adverse effect on those functions of the waterways that cannot be adequately mitigated will not be permitted.

(Note: definitions and functions of the Blue Ribbon Network are those within London Plan Policies 7.24-7.28. The waterways within the Legacy Corporation Area are shown at Figure 8.1)

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Figure 9.1, Waterways within the Legacy Corporation Area



Flood Risk

- 9.4. The potential for flooding within the Legacy Corporation area emanates from the drainage function of the network of waterways within the area and also from surface water flooding following heavy rainfall. Flood Risk modelling has helped to identify the potential locations at risk from flooding from the waterways within the area and these are shown at Figure 9.2. Where there are specific locations at risk from flooding, these are dealt with within the relevant sub area sections of this plan. The sequential and exceptions test required by the NPPF have been utilised in developing the strategic site allocations within the plan. Where relevant, projects for improvement of flood defences have been included within the Legacy Corporations Infrastructure Delivery Plan.

Policy NE4: Flood Risk

The Legacy Corporation will take the most up to date flood risk information into account when carrying out its relevant functions and seek to reduce risk to life and property from flooding in doing so.

The sequential and exceptions tests will be applied to development proposals when these are located within Flood Zones 2 and 3 (as defined in the National Planning Policy Framework 2012).

Development proposals that create an obstruction to the path of flood flows that cannot be mitigated through compensatory works or additional flood storage capacity will not be permitted.

Development proposals will be expected to contribute to the improvement of any localised drainage problems and include appropriate measures to reduce the rate of surface water run-off, including appropriate sustainable drainage measures. Proposals that create or worsen existing localised drainage problems will not be permitted.

Biodiversity

- 9.5. With a natural environment that is characterised by waterways and a series of open spaces many of which connect and provide the basis for a 'blue' and 'green' corridor that runs through the Legacy Corporation area and helps to connect the waterways and green spaces to the north with those running south to the River Thames, the area plays a crucial role in maintaining and developing those linkages and the contribution that is made to meeting the local and London-wide biodiversity objectives identified in the London Biodiversity Action Plan, the borough BAPS and the BAP prepared for the Olympic Park. The diversity of habitat and species identified as appropriate for the area will play an integral role in achieving sustainable growth and a high quality environment that will help to attract investment into the area and contribute to the quality of life experience by those living and working within the area.

Policy NE.5: Biodiversity

The Legacy Corporation will promote an increase in the extent of habitat and in biodiversity in line with the Biodiversity Action Plans that affect its area. It will seek to protect and where appropriate enhance those sites and habitats within its area that have a significant role in delivering the biodiversity objectives of the relevant BAPs.

Development proposals should maximise opportunities to include habitat and other measures that will contribute to meeting the BAP objectives.

Development proposals that are likely to have an adverse effect on habitat or biodiversity will not be permitted unless compensatory habitat provision is provided and that loss does not result in the breakage or fragmentation of any existing habitat or wildlife corridor. Major Planning Applications should be accompanied by a Biodiversity Statement.

Land Quality and Contamination

- 9.6. Much of the Legacy Corporation area has a history of industrial use, with a range of manufacturing and other industries developing alongside significant corridors of transport infrastructure provided to serve it. In more recent times a transition has begun to take place with many, but not all, of these industrial and business uses being replaced by new mixed use development. These past uses have, however, in many cases left a legacy of contamination within the ground that if not dealt with appropriately has the potential to affect human health and natural habitat, including the water environment and groundwater. In some cases significant work has been undertaken to remediate (clean up) contaminated land to remove or reduce that risk or to make it suitable for any new use that is being proposed. The area of the Queen Elizabeth Olympic Park, for example, has been subject to significant remediation work which made it suitable for the staging of the 2012 Games. However, many of the sites that may become available for new development within the Legacy Corporation area are likely to require some form of testing and appropriate remediation work to make them suitable for development.

Policy NE6: Land Quality and Contaminated Land

The Legacy Corporation, through the exercise of its role as a Local Planning Authority, will seek to ensure that land brought forward for new uses or new development through the planning system comprises of land that is of a suitable quality for the use proposed; that where necessary land is remediated to a suitable standard; that where construction works are carried out, suitable measures are taken to protect the environment and human health from the effect of contamination or the release of pollutants.

Air Quality

- 9.7. Much of the Legacy Corporation area is within an Air Quality Management Area, with major road corridors, such as the A12 and A112 Stratford High Street being areas of poor air quality. However, the sources of an extent of pollutants that contribute to poor air quality are not by their nature confined within one planning authority area and so any policies that aid improvement in air quality have to be set in the context of

wider policy, such as London Plan Policy 7.14 (Improving Air Quality). The measures necessary to contain or improve air quality within this part of London, and London as a whole, are those which fall specifically under other policy heading but will aid the achievement of this objective. As the main measures that would have a significant effect are related to the approach to transport and motorised vehicles, and to emissions from buildings, it is policies that apply to these areas that will be generally relevant. Many measures for minimising the effect of emissions from buildings and transport fall outside of the scope of the planning system and are subject to separate regulatory regimes and legislation.

Policy NE7: Air Quality

The Legacy Corporation will seek to ensure that its activities and the exercise of its planning functions result in at least no worsening in air quality within its area and where achievable, result in an improvement.

Development proposals should be designed and constructed in a manner that minimises emission of pollutants to the air and be able to demonstrate compliance with the policies within this plan and the London Plan that contribute to minimising the effect of emissions to the air from buildings and transport.

The All London Green Grid Framework

- 9.8. The Mayor's All London Green Grid SPG sets out the concept of an integrated grid of green and open spaces which works together with the Blue Ribbon Network of rivers and waterways as an interdependent network which promotes the enhancement and management of that green infrastructure. The Legacy Corporation Area falls within the Lea Valley and Finchley Ridge Area Framework that accompanies this Mayoral SPG. This is accompanied by a draft Lea Valley and Finchley Ridge Area Framework which sets out an area strategy for the Lee Valley and includes specific detail that applies to the Legacy Corporation area. Within the Legacy Corporation area as a whole the strategy it sets out focuses on the improvement of the linkages between the open spaces as part of the Lea Valley link to the River Thames. Where there are specific projects identified which could help to deliver this goal these are set out in the Legacy Corporations' Infrastructure Delivery Plan.

Policy NE8: The All London Green Grid

The Legacy Corporation will, through implementation of its policies in this Plan for open space, the waterways and biodiversity and in seeking to implement relevant projects identified in its Infrastructure Delivery Plan, seek to contribute to the enhancement and management of green infrastructure within its area.

Development proposals will be expected to contribute through their design to the enhancement of existing, and where relevant to the provision of new, green infrastructure.

Lee Valley Regional Park

- 9.9. The Legacy Corporation includes areas that comprise part of the Lee Valley Regional Park, including land at Eton Manor and the Lee Valley Velopark, also a part of the Queen Elizabeth Olympic Park area. These areas fall within the ownership of the Lee Valley Regional Park Authority, whose Park Development Framework (2011) sets out the strategy for the future development and management of the Lee Valley Regional Park as whole. The overall strategy in this plan is designed to align with the Park Development Framework and development proposals will be expected to take account of the Park Development Framework where it is relevant. This Plan also identifies MOL and Local Open Space designations around the Lee Valley Park area at Mill Meads in the south of the Legacy Corporation area and which is expected to become a part of the wider Lee Valley Park in this vicinity in the future. The extent of the Lee Valley Park area within the Legacy Corporation Boundary is shown at Figure 9.5.

Metropolitan Open Land

- 9.10. London Plan Policy 7.17 Metropolitan Open Land, provides Metropolitan Open Land (MOL) with the same status and protection as Green Belt and supports the current extent of Green Belt and its extension in appropriate circumstances. The policy states that “The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.”
- 9.11. Areas of Metropolitan Open Land have been historically designated in previous local development plans. The development of the Queen Elizabeth Olympic Park, and the subsequent planning permission for legacy development, has significantly changed the landscape of the core part of the Legacy Corporation area. As a result this consultation document sets out a revised extent of MOL within the area that takes account of those changes. This is illustrated at Figure 9.3.

Policy NE9: Metropolitan Open Land

The Legacy Corporation will seek to maintain the openness of land that is designated as Metropolitan Open Land as defined in Policy 7.17 of the London Plan (July 2011) as shown on the Policies Map.

Proposals which maintain or improve the openness and quality of the land designated as MOL will be supported.

Proposals for inappropriate development within MOL will be refused except in very special circumstances.

Development of essential ancillary facilities will only be permitted where these maintain the openness of the MOL.

Local Open Space

- 9.12. In addition to land suitable for MOL designation, which is also capable of being designated as Local Open Space, there are a range of smaller open spaces within

the Legacy Corporation area, all of which have a particular function and play an integral role in the wider open space network of the area, whether for leisure, play and recreational use, provision of habitat or a combination of these functions. Many also provide an immediate context to the landscape and townscape of their immediate area. It is therefore necessary to protect the function and role of these spaces as part of the wider strategy to deliver healthy and sustainable communities as development and growth is delivered over the lifetime of the plan. Table 9.1 details those spaces that are considered to be significant in this respect and therefore require such protection.

Policy NE10: Local Open Space

Local Open Space, as identified on the Map 9.4 and listed at Table 9.1, will be protected from inappropriate development. Any proposal affecting Local Open Space should:

- Maintain its openness
- Protect or enhance its function(s) (as listed in Table 9.1)

Where a development proposal would result in the loss of all or part of a Local Open Space, this will only be permitted where an equivalent or greater amount of Local Open Space of equivalent or better function is provided in a location that continues to serve the same local community.

Parks and Parklands

- 9.13. The new Queen Elizabeth Olympic Park, a section of the Lee Valley Regional Park and a variety of small parks form part of an extensive wildlife corridor that runs through East London. These parklands provide many benefits to the Legacy Corporation area; supporting biodiversity, improving the health and wellbeing of local communities and visitors and attracting inward investment to support convergence with the rest of London. The Legacy Corporation will work with its partners, such as the Lee Valley Regional Park Authority, to ensure protection and enhancement of these parklands in a way that will reinforce their value and function. This will be a leading priority for the Legacy Corporation and will facilitate regeneration and improved quality of life in the area.

Policy NE11: Parks and Parklands

Parks and parklands within the Legacy Corporation area will be protected through the designation of Local Open Space and Metropolitan Open Land to reinforce their value and function for informal leisure and recreation and for biodiversity. Development that adversely affects the amenity provided by parks and parklands will not be permitted.

Play Space

- 9.14. Play space is critical to improving young people's health, life chances and tackling poverty. A variety of types of play space exist in the Legacy Corporation area, including dedicated areas for children containing play equipment and multi-use games areas for young people. The Mayor's SPG on child play space (2012) sets out a requirement for 10m² of play space per child aged 0 to 17, with a requirement for

proximity to play space that is dependent on age. The significant range of regeneration and development in the Legacy Corporation area presents an opportunity to improve the provision of play space to meet needs arising from the development and create inclusive, accessible and stimulating play spaces that contribute to wider natural networks and create a child friendly city.

Policy NE12: Play Space

The Legacy Corporation will encourage the provision of good quality, well designed, secure and stimulating play space through new development and through schemes to improve and enhance existing play spaces and open spaces.

New play spaces should be:

- of a size and of a design that is in accordance with the London Plan and associated guidance and standards;
- appropriate to the ages of children that it is designed to serve;
- take account of the identified needs for play space identified in up to date borough Play Space Strategies;
- designed to be inclusive and accessible by all children of the appropriate age range.

Where appropriate, playspace provision will be protected through the designation of Metropolitan Open Land and Local Open Space.

Note: Current London Plan policy and standards: London Plan Policy 3.6 Children and Young People's Play and Informal Recreation Facilities, and Shaping Neighbourhoods Play and Informal Recreation SPG (September 2012)

Tables, Figures, Maps

Figure 9.2: Flood Risk Map

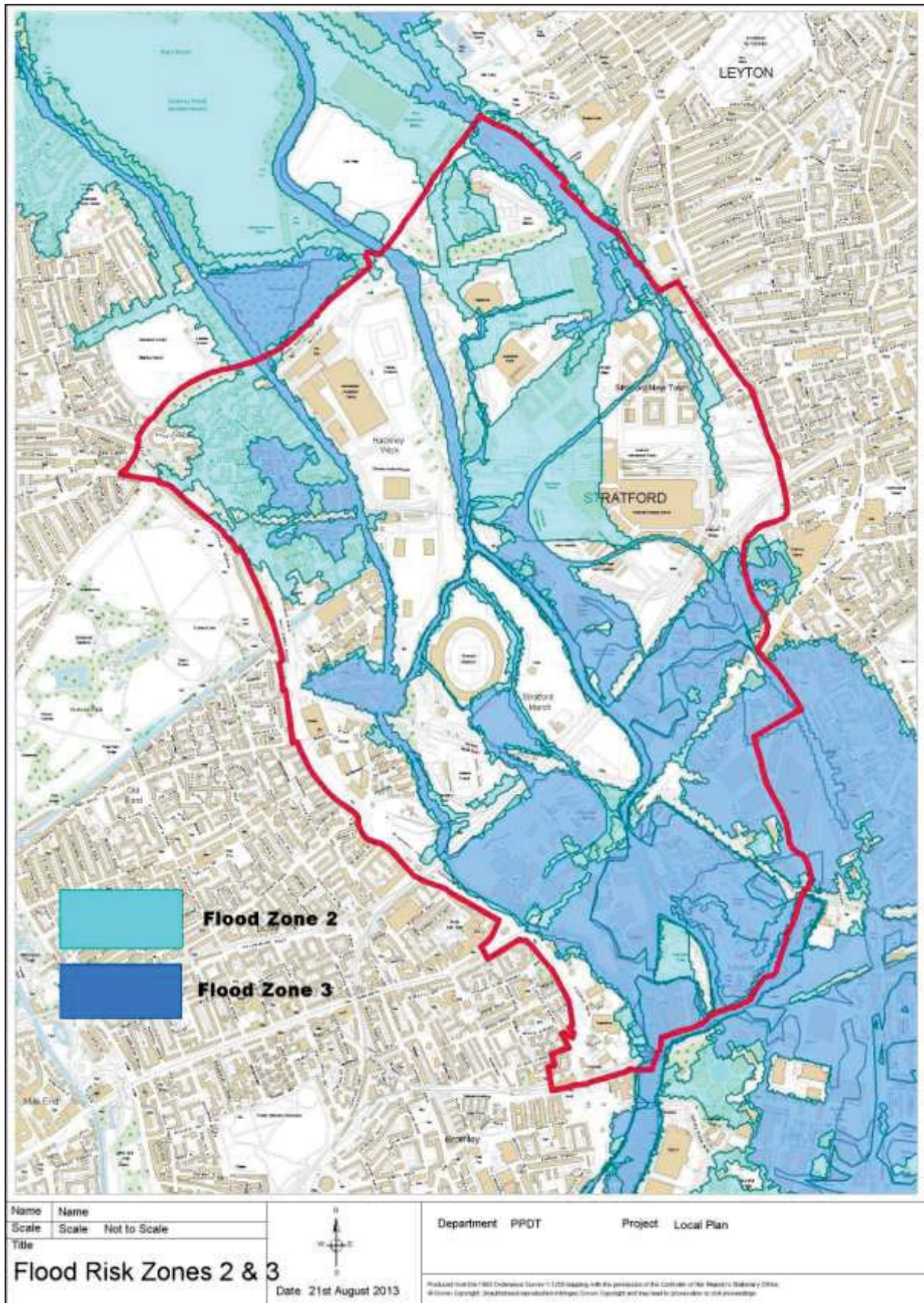


Figure 9.3: Proposed Area of Metropolitan Open Land

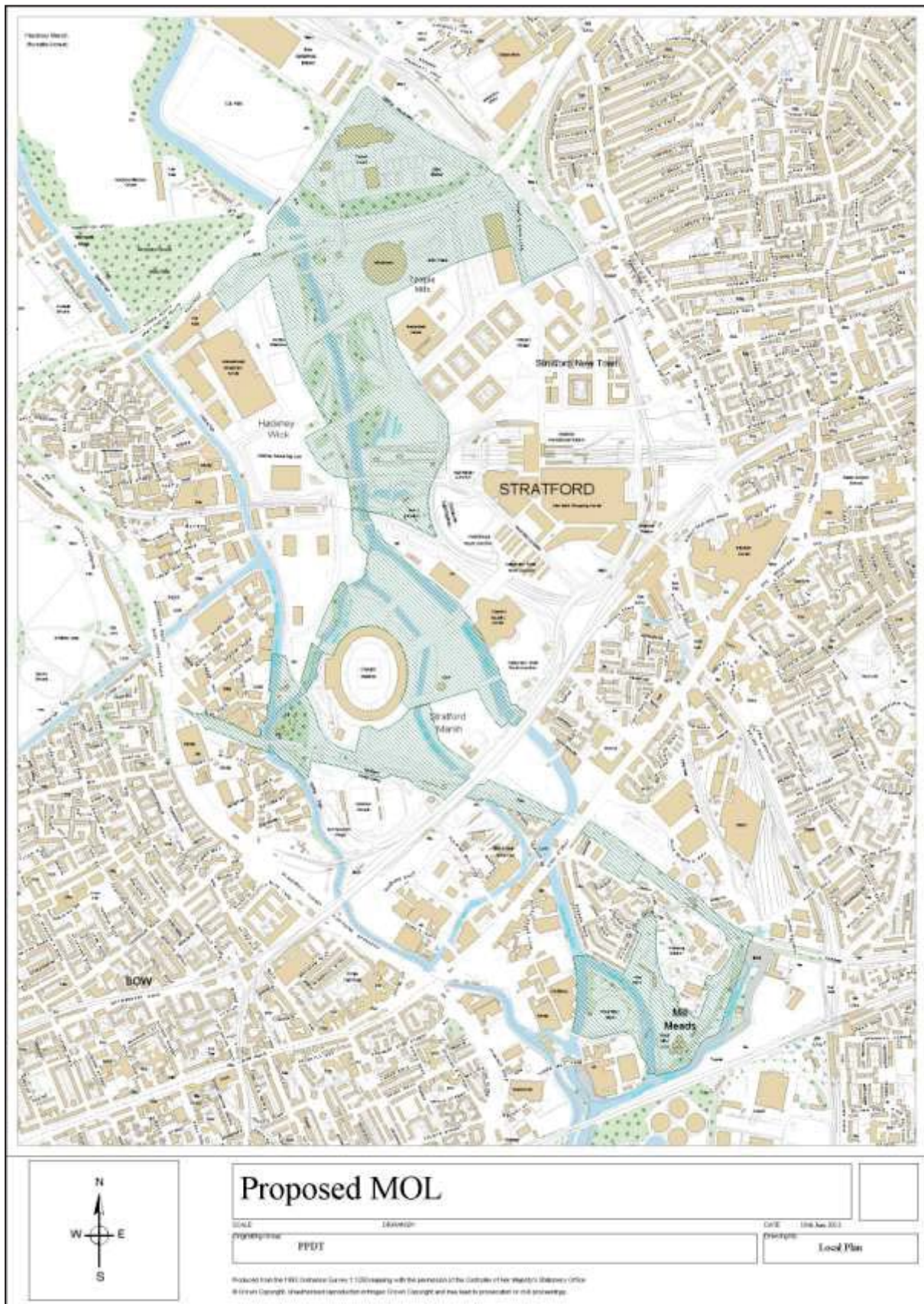


Figure 9.4: Proposed Areas of Local Open Space

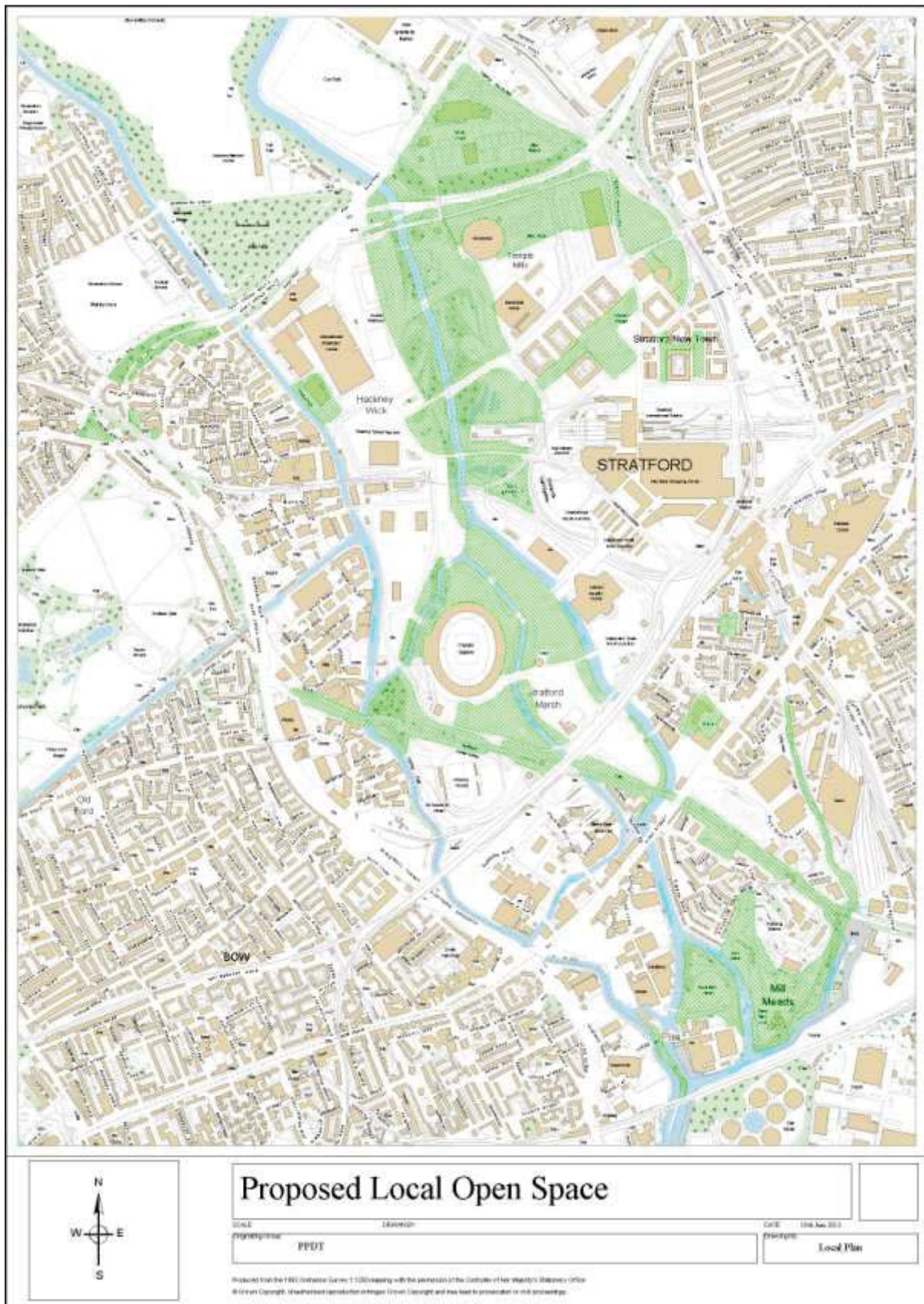


Figure 9.5: Map of Potential Future Open Space from consented development

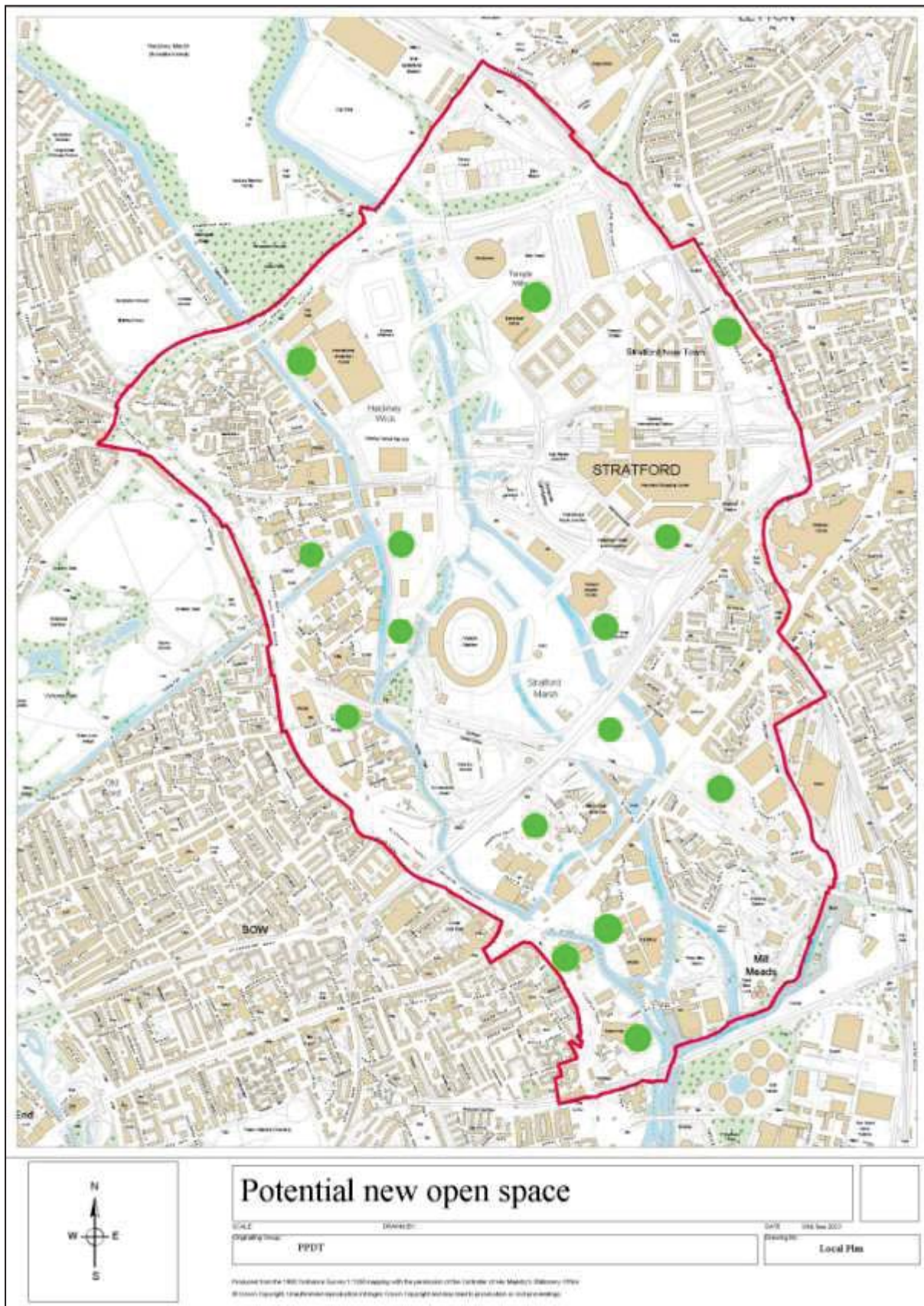


Table 9.1: Local Open Space

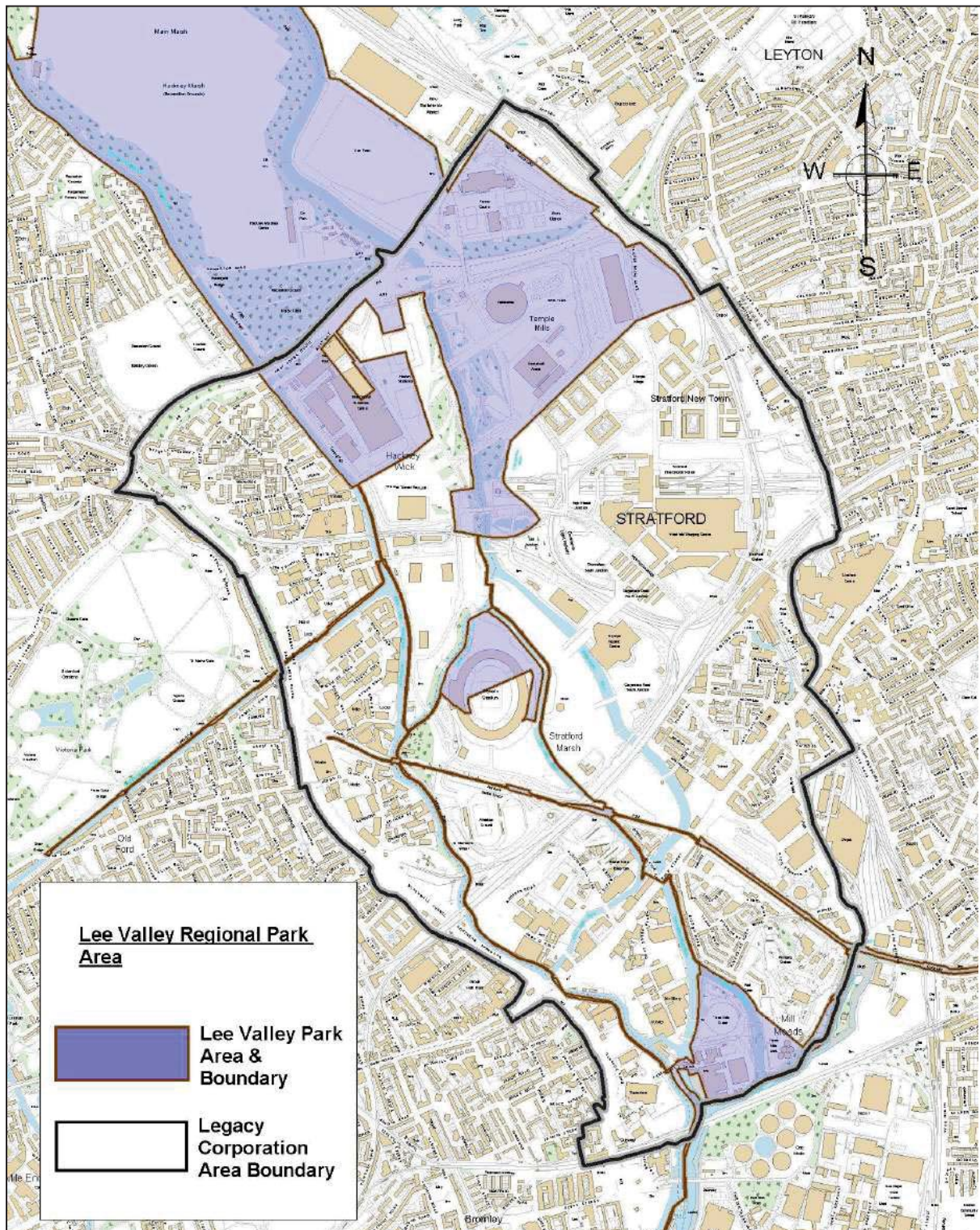
LOS Reference	Description of LOS and Location	Description of LOS character and function	Area (hectares)
LOS1	Area of green open space between A12 and Ruckholt Road, on west Bank of River Lea	Part of Green Link (including operational compound) between Hackney Marshes and Queen Elizabeth Olympic Park	0.1965
LOS2	Area of green open space between A12 and Ruckholt Road, on east bank of River Lea, Temple Mills Lane to the east.	Part of Green Link between Hackney Marshes and Queen Elizabeth Olympic Park	0.3962
LOS3	Eton Manor, area of land between A12, Ruckholt Road and Temple Mills Lane.	Part of Area of open space incorporating built and outdoor sports and leisure facilities.	14.4330
LOS4	Area of green open space between A12 and Ruckholt Road, on west Bank of River Lea	Part of Green Link between Hackney Marshes and Queen Elizabeth Olympic Park	0.2207
LOS5	Area of green open space between junction roads at A12, on west bank of River Lea	Part of Green Link between Hackney Marshes and Queen Elizabeth Olympic Park	0.0876
LOS6	Area of green open space between junction roads at A12, on east bank of River Lea	Part of Green Link between Hackney Marshes and Queen Elizabeth Olympic Park	0.2593
LOS7	Strip of green space between A12 and former Olympic Park Loop Road	Northern most strip of green space within Queen Elizabeth Olympic Park	0.9820
LOS8	Triangle of open space at junction of Eastcross Route and Wick Road	Area of green space.	0.4506
LOS9	Open space between carriageways of A12/Eastcross Route	Area of green space	0.8765
LOS10	Open space at northern part of Hackney Wick south of the A12/Eastcross Route	Area of green space	0.7041
LOS11	Green Space within grounds of St, Mary of Eton Church complex, Eastway, Hackney Wick	Two areas of green space within the St. Mary of Eton Church Complex	0.0847
LOS12	Area of parklands incorporated within north-west parklands of the Queen Elizabeth Olympic Park, west of the River Lea.	Informal parkland and wetlands. North element incorporates the western part of the Velo Park road cycle circuit.	5.7263

LOS13	Area of parklands incorporated within north-east parklands of the Queen Elizabeth Olympic Park, east of the River Lea.	Informal parkland and wetlands. North element incorporates part of the Velo Park road cycle circuit.	8.4442
LOS14	Area of open space to north and east of Velodrome within the north part of the Queen Elizabeth Olympic Park	Open space incorporating outdoor cycling facilities, including road cycle circuit, BMX track and mountain bike trails.	6.6031
LOS15	Chobham Academy Playing Fields, Temple Mills Lane	Enclosed school playing fields	2.4060
LOS16	Open space within grounds of Chobham Academy, Celebration Avenue, Stratford.	Outdoor space within grounds of Chobham Academy.	1.3031
LOS17	Mirabelle Gardens, East Village, Stratford	Area of green and paved open space incorporating public gardens	0.4301
LOS18	Open Space at Ribbons Walk and De Coubertin Street, East Village, Stratford.	Open Space incorporating paved and green areas within street network.	0.4030
LOS19	Victory Park, East Village, Stratford.	Local park incorporating green space	2.4931
LOS20	East Village, Stratford, open space incorporating Glades Walk	Green open space	0.7425
LOS21	Wetland area to east of the River Lea incorporating southern end of Channelsea River.	Wetlands and drainage ponds	3.6308
LOS22	Area of parklands incorporated within north-east parklands of the Queen Elizabeth Olympic Park, east of the River Lea.	Informal parkland and wetlands.	1.6612
LOS23	Area of open space south of the Highspeed 1 Box and east of the River Lea	Area of open space including operational land	0.7592
LOS24	Open space between Waterden Road and railway lines at Lea Junction, east of River Lea.	Drainage pond and wetland area incorporated within green space.	1.2948
LOS25	Open space between railway lines at Lee Junction	Triangle of open space enclosed by railway lines	0.8656
LOS26	Open space west of River Lea, south of Waterden Road, terminating at	Area of riverside open space	0.6079

	Carpenters Lock		
LOS27	Area of open space including towpath, on east of River Lea Navigation, adjacent to the IBC/MPC complex within the Queen Elizabeth Olympic Park.	Area of enclosed open space providing school playing fields for Gainsborough School, with adjacent land along canal towpath outside of enclosure.	1.3371
LOS28	Open space on west bank of River Lea	Open space incorporating formal gardens and riverside open space	0.5508
LOS29	Open space on west bank of River Lea	Riverside open space	0.2739
LOS30	Open space incorporating the Old Ford Nature Reserve (with Thameswater Water Treatment Facility) and the Greenway from Wick Lane to Pudding Mill.	Combination of green space and paved routes, with Greenway as permissive route and Old Ford Nature Reserve area as enclosed area.	6.1697
LOS31	Stadium Island Open Space	Combination of riverside open space and habitats and stadium concourse green and hard landscaped concourse areas.	3.8600
LOS32	Riverside open space on west bank of City Mill River along with area of stadium warm-up track.	Riverside open space and formal outdoor sports track and field area and associated landscaping	2.7398
LOS33	Open Space incorporating Queen Elizabeth Olympic Park, South Plaza area, Stratford.	Combination of formal/informal green spaces, garden areas and play spaces, combined with event spaces.	5.9848
LOS34	Open space on east bank of City Mill River	Riverside open space	0.6061
LOS35	Open space on west bank of Waterworks River	Riverside open space	0.4803
LOS36	Greenway between railway lines and Stratford High Street, including riverside open space along Waterworks River.	Combination of green space and paved routes, with Greenway as permissive route and incorporating riverside open space along the Waterworks River.	1.8881
LOS37	Central Open Space area within Carpenters Estate	Green space and hard paved play area within Carpenters Estate	0.3250
LOS38	Carpenters Primary School, Carpenters Estate, Stratford	Green and hard paved spaces within boundary of Carpenters School, including play areas.	1.0849
LOS39	Open Space incorporating Greenway south of Stratford High Street,	Combination of green space and paved routes, with Greenway as permissive	4.4882

	Channelsea Path route and incorporating Abbey Lane open space	route and including Abbey Lane Green Open Space green space and play equipment	
LOS40	Green space within Mill Meades section of Lea Valley Park.	Incorporating green space adjacent to Abbey Mills Pumping Station and area of allotment gardens.	7.5373
LOS41	Three Mills Green open space, Three Mills Island	Public Park/green space, incorporating play equipment.	3.6511
LOS42	Strip of open space between River Lea and Bow Creek, at Three Mills.	Tow path and publicly accessible green space.	0.3512
TOTAL AREA OF OPEN SPACE LOCAL OPEN SPACE			97.391

Figure 9.6: Extent of Lee Valley Park within Legacy Corporation Area



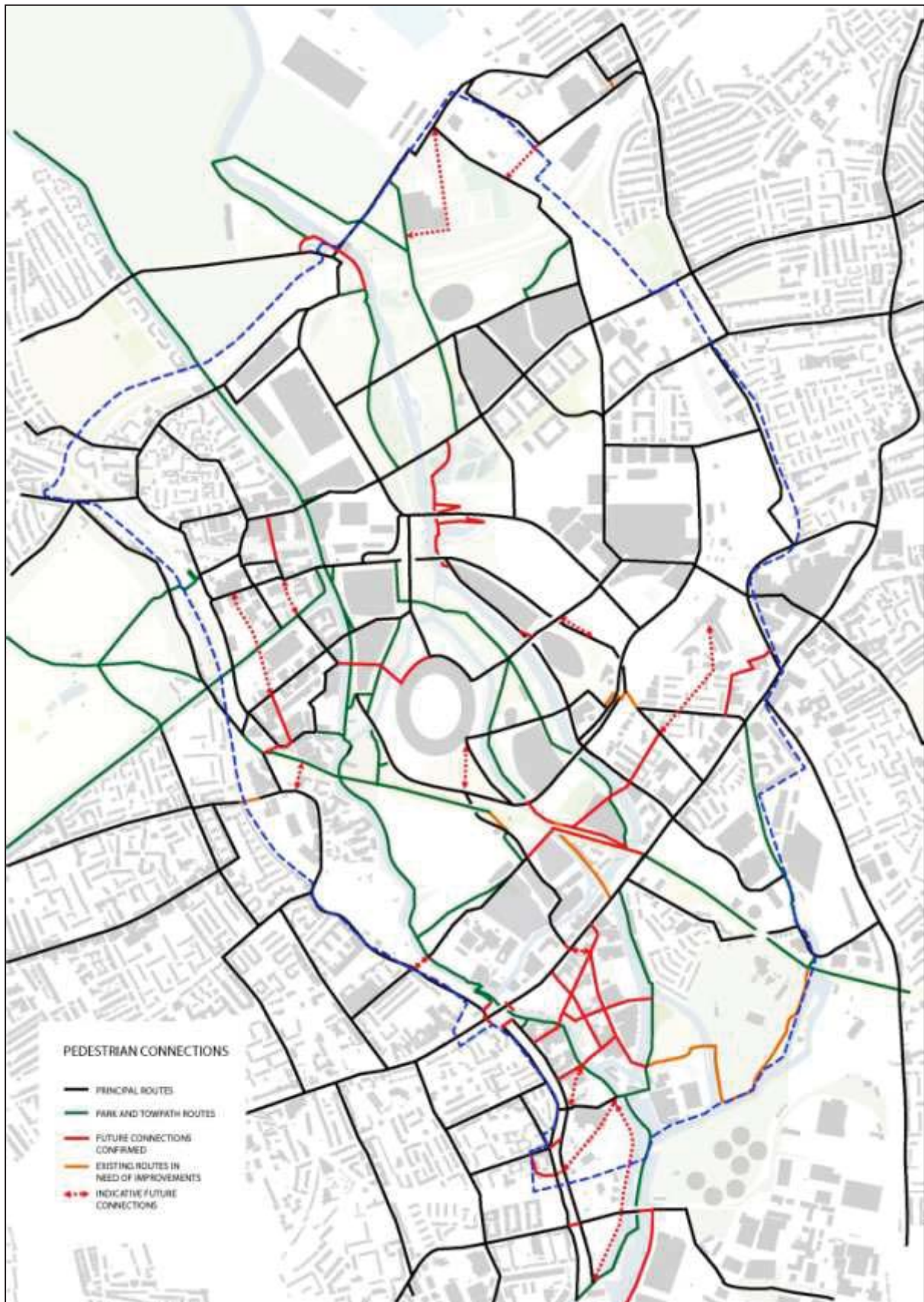
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10. Transport and Connectivity



- 10.1. The Legacy Corporation area benefits from a number of strategic transport connections, with Stratford in particular being one of the most connected places in London, with regional and local rail services, overground, underground and DLR services and providing a hub for bus services. High Speed 1 services connect to St. Pancras in six minutes, while Crossrail, when operational in 2018 will enable travel from Stratford to central London in approximately ten minutes. There are also strategic roads including the A12, Stratford High Street and Leyton Road.
- 10.2. The Lower Lea Valley, within which the Legacy Corporation area sits, has long been a natural barrier between those parts of east London to the east and the west of the River Lea, with a few crossing points but otherwise presenting a barrier to much potential local movement. The development of the Queen Elizabeth Olympic Park, will introduce new and improved road and pedestrian and cycle bridges and routes as part of the permanent legacy from the 2012 Games
- 10.3. While transport infrastructure in the area has received significant levels of recent investment, there is crowding and congestion on parts of the area's public transport and highway networks, and some parts of the Legacy Corporation area are less well served by public transport. A number of key projects are considered to be necessary to enable the area to reach its full potential for growth in business, jobs and homes. These are focused around improvements to local access to existing stations and the improvement of local walking and cycling connections, particularly in the locations away from the Queen Elizabeth Olympic Park. Priority projects are identified in this section of the plan and in more detail in the Infrastructure Delivery Plan. The level of growth also points to the need to manage the level of private car use within the area to ensure that the potential impact of new development on local and strategic roads within the area are generally mitigated. Policies addressing parking and the requirements for transport assessment set out the approach proposed to achieve this.

Local Plan Objectives

OBJECTIVE 2, Jobs: secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.

OBJECTIVE 8, Creating Neighbourhoods: to expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

OBJECTIVE 11, Climate change and energy: contribute to the Mayor's target of achieving "an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025"¹, by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.

OBJECTIVE 13, Transport and Connectivity: seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.

Strategic Policy SP7: Transport and Connectivity

The Legacy Corporation will work with its partners to promote and seek to deliver the range of transport infrastructure and services that will help to deliver the growth objectives set out within this Plan, including those that will improve international, national, regional and local connectivity.

Through its planning powers, the Legacy Corporation will promote sustainable transport choices and minimise reliance on the private car to ensure that the development of the legacy area is optimised.

In doing so, the Legacy Corporation:

- Will seek to ensure that amount of new development and growth across its area is related to the capacity of existing or currently planned improvements to transport infrastructure and services.
- Will expect new development to maximise the opportunities to improve connectivity across within and through the Legacy Corporation area and, where opportunities arise, with the wider Lower Lea Valley and East London.
- Will expect new development to be designed to include measures that will minimise its impact on public transport and the highway network with appropriate levels of car parking.
- Will expect new development to provide appropriate facilities for the full range of transport users, including pedestrians, rail, bus, car and cycling, and promote travel planning and smarter travel.

Local Connectivity

- 10.4. Local connectivity is a key issue for the liveability of an area and at the moment, local movement across the Lea Valley is often constrained by waterways, major roads such as the A12, and other transport infrastructure. This in turn can make it difficult for people to move about the area and creates physical and social barriers. Unless these constraints are addressed strategically, they will restrict access to the new facilities and opportunities that will come forward after the 2012 Games – within the Queen Elizabeth Olympic Park itself, at Stratford, and in the areas surrounding the Park as they evolve into new mixed use and residential neighbourhoods.”
- 10.5. There is significant potential to increase the number of walkable and cyclable trips in the Legacy Corporation area. Improved local connectivity should provide direct links to amenities and public transport stops. In addition to walking and cycling measures, local connectivity should also include infrastructure to provide the opportunity for bus services to serve neighbourhoods, particularly those located away from rail and underground stations.

Policy T1: Local Connectivity

Major development proposals should be designed to integrate into the area and should facilitate improvements to local connectivity, both within the development site and across the Legacy Corporation area.

Strategic Transport Improvements

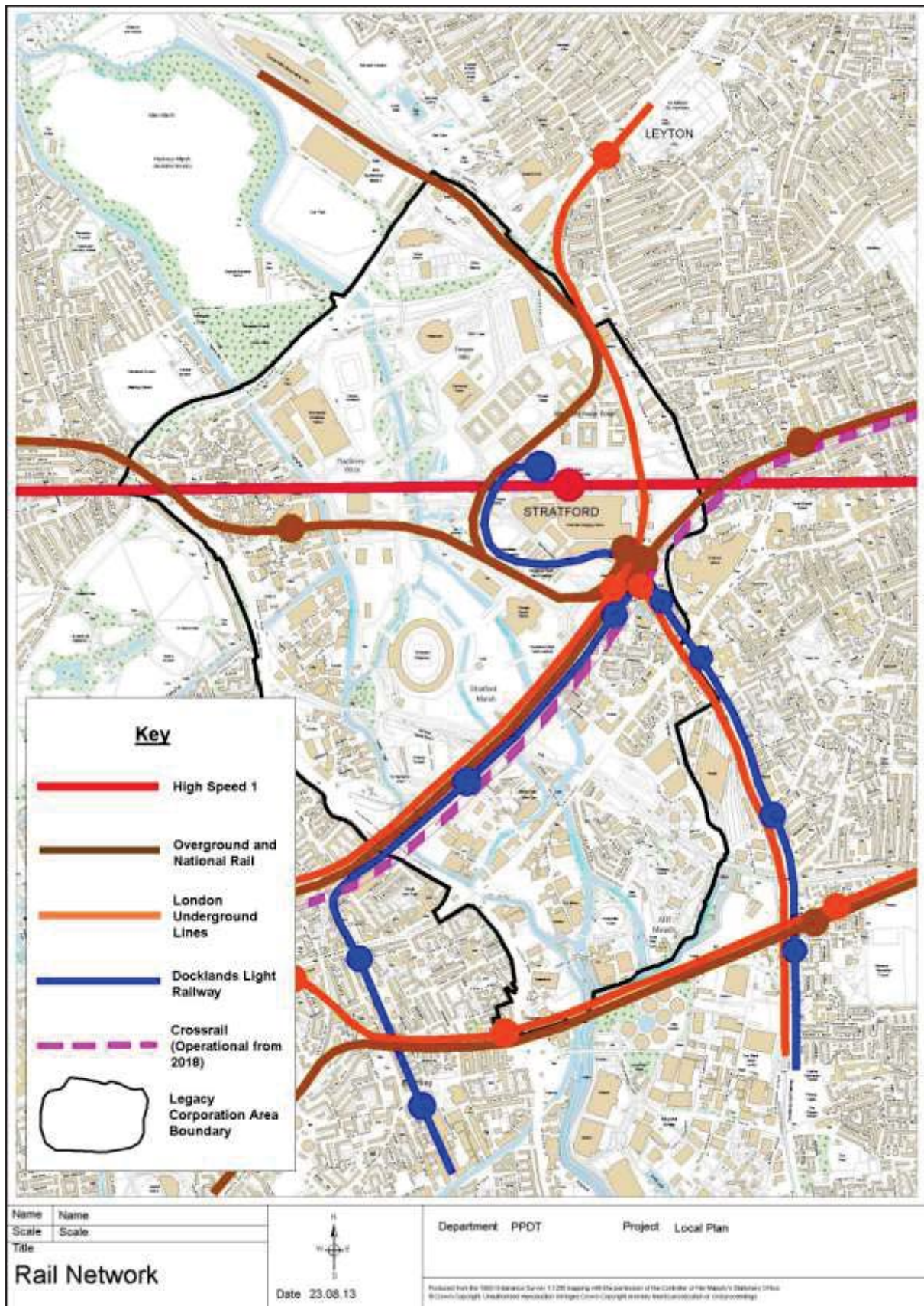
- 10.6. Stopping international trains at Stratford International and linking Stratford to High Speed 2 would help cement the ongoing regeneration of the Stratford area, by increasing its profile nationally and internationally, providing fast and convenient travel opportunities for businesses locating in and around Stratford and provide improved strategic transport links for people working and living in the area.
- 10.7. The Legacy Corporation area already has direct DLR links to London City Airport and coach links to Stansted Airport, and from 2018 via Crossrail direct to Heathrow. During the lifetime of this Local Plan the Airports Commission will examine the need for additional UK airport capacity and recommend to government how this can be met in the short, medium and long term. The Legacy Corporation will support improved rail access to airports.

Policy T2: Strategic Transport Improvements

The Legacy Corporation will promote and seek to secure improved connections to support international and national economic growth within its own area and more widely within the Growth Boroughs / East London / Thames Gateway. In particular it will seek to secure:

- Stopping international trains at Stratford International Station;
- A rail link to High Speed 2 from Stratford;
- Improved connections to airports.

Figure 10.1: Rail network within Legacy Corporation Area



Parking

- 10.8. The London Plan sets out maximum parking standards for different types of new development, currently within the Parking Addendum to Chapter 6 and within Table 6.2 Parking Standards.
- 10.9. It is expected that new development within the Legacy Corporation area will comply with the Parking standards set out in the London Plan, including those for cycle parking. Policy T3 also requires that the actual level of parking provision proposed for any particular development proposal takes into account local factors such as the ease of access to public transport services and to town and local centres.
- 10.10. Much of the development within the Legacy Corporation area is likely to take place on large sites in a comprehensive manner to which parking standards and levels of accessibility to public transport can be factored into the transport assessment of the scheme. However, in those parts of the area which comprise a mix and range of existing development, such as Hackney Wick and Fish Island, it will also be appropriate to take account of the character and form of development in that location in determining the amount of parking, within the maximum allowed by the standards, that can be accommodated. Levels of parking should not compromise the form and character of the street as a whole or the ability of individual development proposals to provide safe and active street frontages and appropriate levels of open space, public realm and private amenity space. In such locations this is likely to result in levels of off street parking well below the maximum within the standard.

Policy T3: Parking and Parking Standards

New development will be required to provide parking in accordance with the parking standards set out in the London Plan, including those for cycle parking. Provision of parking for cars should also be made in accordance with the following criteria:

- be at a level appropriate to its location, with lowest levels of provision in those locations that have the highest levels of transport accessibility;
- be provided in a way that is appropriate to the existing character and form of the built environment;
- should not take the place of other potential street level uses or dominate street frontages;
- should not take precedence over the incorporation of open space, public realm or amenity space within and around the development;
- incorporate new car club spaces, particularly where low levels of parking are being proposed.

Where a scheme requires a transport assessment to be submitted, in accordance with Policy T5 of this Plan, the appropriate level of parking should be determined through the assessment process.

For venues which generate a significant level of attendance by members of the public during events, there should be no provision for parking of private vehicles during events, except to meet requirements in the standards for Blue Badge Parking

Bays and for parking for vehicles required for operational purposes.

Where low levels of parking are proposed, the Legacy Corporation in consultation with the appropriate borough, may require that contributions are made towards the setting of new or changes to existing controlled parking schemes. Development will not be permitted where low levels of on-site parking are proposed and no controlled parking scheme is in place or planned.

Pedestrians and Cyclists

- 10.11. In order to encourage the further increase in the levels of walking and cycling, it is important to ensure that routes available for walking and cycling are in locations that provide reasonably direct routes which are perceived as safe to use. It is also important that these routes avoid, where possible, potential for conflict between vehicular traffic and between cyclists and pedestrians. Walking and cycling routes should be, where possible, step-free and accessible.
- 10.12. Connections should be provided to strategic walking and cycling routes, such as the Greenway, Cycle Super Highway 2 and Lee Valley Strategic Walking Route, which will enable longer walking and cycling trips.
- 10.13. The way in which cycle parking is provided is also an important element of encouraging cycling to non-residential destinations, with the security of the type and the location of parking facility being significant factors. Changing and showering facilities in workplaces also have a significant role in encouraging day to day cycle commuting. Proposals for cycling related infrastructure should be able to demonstrate that they comply with the TfL London Cycling Design Standards current at the time. Provision should be made to accommodate potential expansion of the Mayor's Cycle Hire scheme.
- 10.14. The provision of wayfinding and signage (such as Legible London) should be consistently applied across the Legacy Corporation area, in order to ensure continuity for users.

Policy T4: Provision for pedestrians and cyclists

The legacy corporation will promote and support the provision of safe routes for walking and cycling within its area that connect well with locations within and outside of its area. Routes, where possible should be direct and unobstructed by signs and street furniture and be designed to be in accordance with the relevant best practice guidance in place at the time. Where possible, according to the circumstances and character of the road, cycle routes should be physically segregated from vehicular traffic and also designed to minimise conflict with pedestrians.

Parking provision for cyclists should be in accordance with current London Plan standards. For non-residential development that provision should be in a safe and secure and overlooked location, preferably under shelter. Work place cycle facilities should also include adequate levels of showering and changing facilities.

Transport Assessments and Travel Plans

- 10.15. The London Plan requires that any planning application which is referable to the Mayor is accompanied by a Transport Assessment. It is expected that any transport assessment is carried out in accordance with the Transport for London Transport Assessment Best Practice Guidance, April 2010.
- 10.16. In exceptional cases proposals may come forward for development which falls below the thresholds for referring applications to the Mayor but may be considered to be likely to have a significant effect on highway or public transport capacity. In these cases, a transport assessment may also be sought. Effective and early pre-application discussion will help to identify whether such a requirement is likely and is particularly encouraged where a proposal may fall just below the relevant thresholds.
- 10.17. In preparing a Travel Plan, account should be taken of TfL's Travel Planning guidance ‘
- 10.18. To complement the infrastructure improvements set out in the Legacy Corporation Infrastructure Delivery Plan, Travel Plans provide a means to help increase public transport usage, walking and cycling, reduce private car usage, reduce inappropriate car parking, improve health and wellbeing, increase road safety and reduce traffic congestion. Applicable developments will be required to implement effective travel plans that:
- introduce measures that actively promote walking and cycling and public transport use (cycle parking, travel and wayfinding information, etc.);
 - promote sustainable car use through initiatives like car sharing and car clubs;
 - provide a greater smarter choice offer (alternative employment hours, ridesharing, information, etc.);
 - improve transport provision for mobility and visually impaired users;
 - effective planning of freight and deliveries into and out of the LLDC area generally and to particular developments.
- 10.19. Population forecasts for the Legacy Corporation area suggest that there will be around 11,000 additional children in the Legacy Corporation area by the early 2030's. Travel to school by car has the potential to contribute particularly to AM peak traffic conditions and therefore, school travel planning is particularly important to help encourage low car mode share for these trips and promote sustainable travel options. Travel plans will therefore need to be agreed as part of the planning process for new schools. Where appropriate, the Travel plan and the proposed travel plan measures will be secured through planning conditions or S106 Legal Agreement.

Policy T5: Transport Assessments and Travel Plans

Proposals for development that would be referable to the Mayor of London under the Town and Country Planning (Mayor of London Order) 2008 (see Annex [X], will require the submission of a Transport Assessment with any planning application. Where any development proposal falls below these thresholds but may have significant transport impacts, the Local Planning Authority may identify a requirement for submission of a Transport Assessment to assess those potential effects. This will be considered on a case by case basis.

Where a Transport Assessment is required this should also be accompanied by a

Travel Plan appropriate to the anticipated end uses for the development proposed. All proposals for new or expanded schools or other education or institutional uses should be accompanied by a Travel Plan.

The Road Network

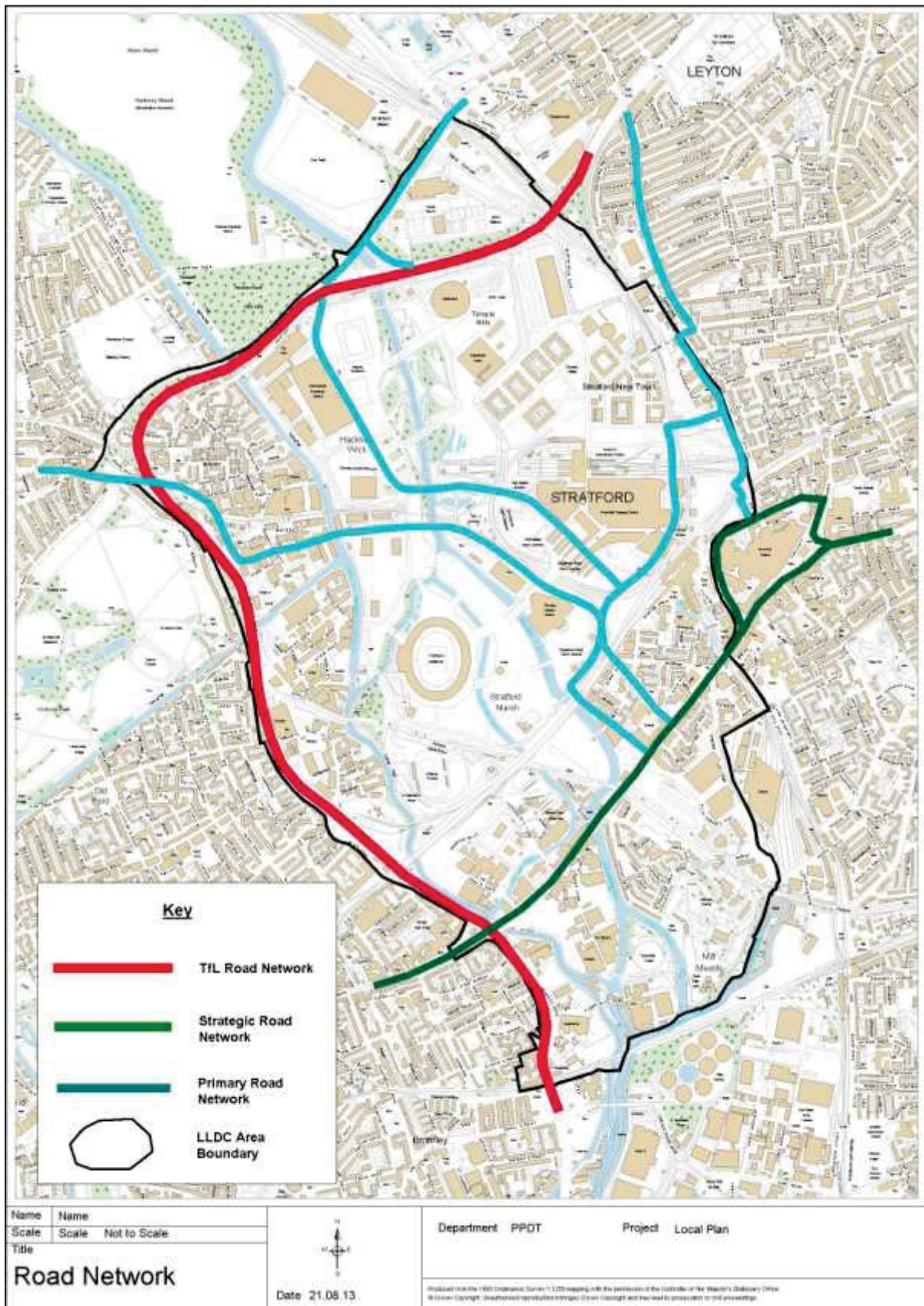
- 10.20. The structure and hierarchy of roads within the Legacy Corporation area helps to determine the most appropriate routes within and through the area and where and how property and development proposals can best connect to that network. The Legacy Corporation in its function as Local Planning Authority, will consult with Boroughs and Transport for London as appropriate in respect of their role as Highways Authorities within the area to ensure that effects of proposals are properly considered.

Policy T6: Road Hierarchy

In developing proposals for development, carrying out transport assessments, preparing travel plans and in designing appropriate internal road networks, and access and egress points for development schemes, account should be taken of the hierarchy of Roads within the Legacy Corporation Area.

- Transport for London Road Network (TLRN)/Red Route: A12
- Strategic Road Network: A118 Stratford High Street and Great Eastern Road,
- Queen Elizabeth Park Primary Road Network: Waterden Road, Carpenters Road, Westfield Avenue, Montfitchet Road

Figure 10.2: Road Hierarchy within the Legacy Corporation Area



Transport Improvements

10.21. While the majority of highway and public transport improvements are already in place within the Legacy Corporation Area to facilitate the level of growth identified within this Plan, there is crowding and congestion on parts of the area's public transport and highway networks, and some parts of the Legacy Corporation area are less well served by public transport. A number of additional transport and infrastructure and local connectivity projects have been identified as being required to support development delivery in particular locations. These projects are identified in more detail within the four sub area sections within this Plan and within the Legacy Corporations' Infrastructure Delivery Plan. Key projects include:

- Upgrade of Hackney Wick Station
- Improvements to Bromley-by-Bow Station
- A new western entrance to Stratford Regional Station
- A new All Movements Junction with the A12 at Bromley-by-Bow
- Improvements to Bow Roundabout?
- Leyton Road A112 improvements
- New and improved links across the A12 and River Lea and Lea Navigation
- A new Sugar House Lane Stratford High Street Junction, including potential link to Marshgate Lane.

Policy T7: Transport Improvements

The Legacy Corporation will use its powers and influence to support and bring forward transport improvements as set out in the Infrastructure Delivery Plan which are necessary to support the level of growth anticipated in the local plan. Where particular transport scheme are identified, and particularly where schemes are subject to formal statutory safeguarding orders or informal safeguarding, within this Plan or the Legacy Corporation Infrastructure Delivery Plan, development proposals will be required to demonstrate that adequate provision for the implementation of those schemes has been made.

Supporting Transport Schemes

10.22. There are a number of potential transport schemes with or adjacent to the Legacy Corporation area that have the potential to benefit the transport accessibility, highway safety or public realm in and around the Legacy Corporation area. These will generally be delivered by other agencies including Transport for London, Network Rail and the four London Boroughs, however, it is appropriate that these are generally supported, and where appropriate the Legacy Corporation as Local Planning Authority will work in partnership to facilitate delivery of these schemes, particularly where planning permission might be required for elements of schemes within its administrative area.

10.23. Examples of significant potential schemes include:

- Removal of Stratford Gyratory System and introduction of two way working.
- Narrowing of Stratford High Street to the north East of Warton Road
- Leyton Station Upgrade and improvements to North West rail links

- Lee Valley rail line improvements
- River Crossings package

10.24. Where particular development proposals are directly related to proposed schemes, it will be expected that schemes are developed to take these into account and where appropriate contribute to the delivery of these projects.

10.25. The Legacy Corporation area's strategic roads are particularly vulnerable to traffic incidents in the Blackwall Tunnel and its approaches. The Mayor of London is investigating a River Crossings package which will be expected to progress through the lifetime of this Local Plan.

Policy T8: Supporting Transport Schemes

Subject to detailed design, the Legacy Corporation will support public transport and highways schemes proposed with or adjacent to its area where these support the level of growth planned within its area or will result in improvements to transport capacity, highway safety or improvements to the public realm.

Transport and the Waterways

10.26. The character of the Legacy Corporation area is in part derived from its waterways. Improvements to the waterways and increasing intensity of use will help promote more sustainable transport choices, and improve the quality, biodiversity and character of the surrounding area. Projects such as the Lea River Park which is being led by the Legacy Corporation will improve access to and along the waterways and provide an upgrade in the surrounding environment, as well as implementing the Lea Valley Strategic Walking route as set out in map 6.3 of the London Plan. This Policy should be read in conjunction with Policy NE3.

Policy T9: The Transport function of the Waterways

The Legacy Corporation will encourage and support the use of the waterways for passenger and freight transport and leisure uses, taking into account any impact on biodiversity and drainage functions.

Where appropriate the Legacy Corporation will require development proposals to provide new or improved access to the waterways, improvements to towpaths and footpaths and facilitate the introduction of moorings and other waterway related infrastructure where these do not compromise the other functions of those waterways.

References and evidence base

- Legacy Development Corporation Infrastructure Delivery Plan Study Report, URS, 2013
- Olympic Legacy Supplementary Planning Guidance (OLSPG) – Mayor of London July 2012
- Olympic Legacy Supplementary Planning Guidance: OLSPG Strategic Transport Study – TFL with support from Steer Davies Gleave, Sinclair Knight

Mertz and the London Thames Gateway Development Corporation, August 2011.

- Stratford Metropolitan Masterplan, London Borough of Newham, 2011
- Fish Island Area Action Plan, London Borough of Tower Hamlets, 2012
- Hackney Wick Area Action Plan, London Borough of Hackney, 2012
- Northern Olympic Fringe Area Action Plan Preferred Options, London Borough Waltham Forest, 2011
- A12 Study: London Thames Gateway Development Corporation, 2010
- Legacy Communities Scheme Transport Assessment, Olympic Park Legacy Company, 2012
- Newham Core Strategy, London borough of Newham, 2012
- Hackney Core Strategy, London Borough of Hackney, 2010
- Tower Hamlets Core Strategy, London Borough of Tower Hamlets, 2010
- Waltham Forest Core Strategy, London Borough of Waltham Forest, 2012
- London Plan, Mayor of London, July 2011
- Town and Country Planning (Mayor of London Order) 2008
- Transport for London Transport Assessment Best Practice Guidance, April 2010

11. The Sub Areas – Introduction

11.1. The Legacy Corporation Local Plan area, while a geographically well defined area in itself, also consists of a series of places, some of which are well established, others which are in the process of change, and others that will in time become new places. To enable the Local Plan to provide more detailed policy, identify specific site allocations and provide guidance on the form of change and development, these places have been grouped into four sub-areas:

Sub Area 1: Hackney Wick and Fish Island;

Sub Area 2: North Stratford and Eton Manor;

Sub Area 3: Central and South Stratford, and Queen Elizabeth Olympic Park South;

Sub Area 4: Bromley-by-Bow, Three Mills and Pudding Mill.



Figure 11.1: Local Plan Sub Areas

11.2. The following sub area sections set out a proposed direction for each area through the proposed vision, the opportunities presented for change within each area, the place specific policies and the proposed site allocations. This consultation document focuses on these proposed key principles for each sub area. It is intended that, having taken the outcome of the consultation into account, further detailed work will be undertaken to integrate appropriate guidance on the design and form of development for each location and how this should integrate with existing development and the surrounding areas, along with guidance on the application of the other relevant policies in the draft plan and the London Plan.

12. Sub Area 1 - Hackney Wick and Fish Island



12.1. Sub Area 1 sits to the west of Stratford town centre, and covers the edge of the Legacy Corporation area where it overlaps with both Hackney and Tower Hamlets.

12.2. The features of Sub Area 1 are outlined in more detail below:

- In the late 19th century Hackney Wick and Fish Island was a pioneering industrial area and today retains significant light industrial uses alongside a high density of artist studios.
- The area is located around a network of rivers and canals; traditionally the transport route of east London's industrial and commercial goods and today home to a mix of canal boats, biodiversity and a network of towpaths for pedestrians and cyclists. The majority of Hackney Wick is covered by either Flood Zones 2 or 3, with significant areas of Fish Island covered by Flood Zones 2 and 3 also.
- Hackney Wick overground rail station is located towards the centre of the area. There are plans to upgrade the Station to improve access and facilitate the wider regeneration of the area.
- Strategically placed bridges and walkways currently connect those areas of land bisected by the River Lee Navigation. Further connections are planned to link those areas presently severed by the A12. The river and canals are also severances which are currently being addressed through the delivery of new bridges.
- To the north west of Hackney Wick station is the Trowbridge estate where residential uses predominate. Local amenities are concentrated towards Eastway and include a community centre, a health centre, a place of worship, a primary school, and other facilities that serve the retail and community needs of the local residents within that area.
- The area surrounding the station and to the south of it has been identified as an area with potential for substantial change. The Fish Island AAP designates a new neighbourhood centre within this area, whilst the Hackney Wick AAP identifies it as an area for employment led regeneration. Both plans identify a need to increase and diversify the residential offer in this area.
- A traveller site is located south of the railway line at the corner of Chapman and Wallis Road. This will be protected through Local Plan Policy.
- To the south of Hackney Wick Station light industrial and artisan uses predominate.
- A number of buildings are locally listed or have been identified as buildings of townscape merit due to their contribution to local character. There are two

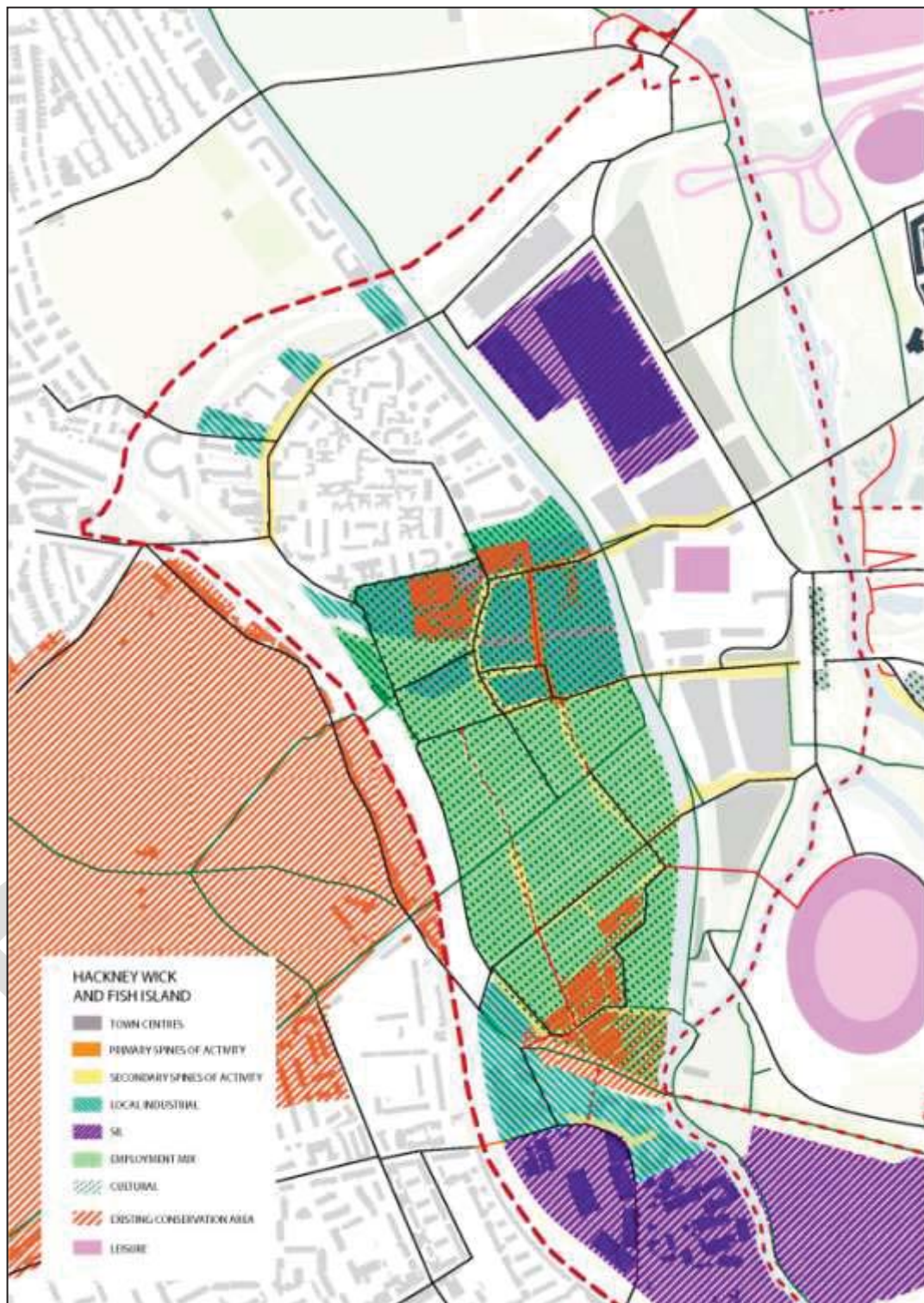
statutory listed buildings within this area: St Mary of Eton Church and Gainsborough Primary School, and two designated Conservation Areas: Hackney Wick and Fish Island. (These are illustrated within the Historic and Built Environment Chapter). A number of residential/live-work developments have also been completed alongside the canal in recent years. A mapping audit exercise undertaken by the London Development Agency identified 610 studios (including live/work) across the Hackney Wick and Fish Island area in 2009.

- The Copper Box is a multi use arena, which serves as a venue for a variety of indoor sports, with the highly flexible design meaning it can be used for all levels of sports participation. It includes a health and fitness gym and a cafe for the local community. As the third largest arena in London, it can also host concerts, shows, exhibitions and conferences, along with other major sporting events.
- The Kings Yard energy centre is located next to White Post Lane and provides a local source of efficient, low carbon heating and cooling across the Olympic Park and the wider area. The energy centre's 'Retained Building' has been refurbished to house a visitor's centre and office space accommodating over 100 staff. The Olympic Park Primary Electricity Substation is located to the east of the Energy Centre.

Relationship with Surroundings

- 12.3. Figure 12.1 shows the context of the sub area surroundings, with Mabley Green and Hackney Marsh to the north, and the Queen Elizabeth Olympic Park and Stratford New Town to the east; including Regional and International Stations, and shopping and entertainment facilities. Pudding Mill and Bow are to the south, whilst the A12 borders the area along the west. The sub-area is crossed by many waterways, which all connect to London's extensive river network. Hackney Wick and Fish Island are bounded by hard infrastructure – roads, rail and waterways and the main sewer under the Greenway. However this area is in a pivotal location and forms part of the long-standing north-south axis of the Lea Valley, a territory of mainly open land, water bodies and industrial sites that reach from the outer edge of London through Enfield down to the River Thames at Leamouth. Immediately to the south and south-east of Hackney Wick and Fish Island are Old Ford and, across the A12, the Roman Road neighbourhood and historic Victoria Park. To the north of Victoria Park and the Hackney Wick area are more extensive residential neighbourhoods that are now undergoing rapid regeneration.

Figure 12.1: Relationship to the surrounding context



Vision for Sub Area 1

A mix of new and established residential communities and strategic and local employment hubs amid East London's biodiverse waterways and parkland, served by a neighbourhood centre located around Hackney Wick Station, easily accessible by new streets and bridges that break through barriers to movement and open up opportunities for informal leisure along the canals and within Queen Elizabeth Olympic Park.

Alongside this will be a vibrant new hub of digital/media industries, business development, and education, all based around the former 2012 Olympic Press and Broadcast centres. Areas to the west of the Lea Navigation will see a shift away from industry that will be heritage led, taking account of the area's existing historic character, and maintaining a strong connection to local identity and the active yard spaces that characterise this area's social, creative and economic life.

Opportunities for Change and Development

- 12.4. Opportunities for change and for new development in this sub area exist both within the Queen Elizabeth Olympic Park and in parts of the established areas of Hackney Wick and Fish Island to the west.
- 12.5. Within the Queen Elizabeth Olympic Park, the Legacy Corporation's Legacy Communities Scheme consists of two development zones, each of which has outline planning permission for the development of two new mixed use neighbourhoods. These zones are Sweetwater (Planning Delivery Zone 4) and East Wick (Planning Delivery Zone 5).

Planning Delivery Zone 4 (PDZ4) - Sweetwater:

- 12.6. This includes land bounded to the west by the River Lee Navigation and to the east by the River Lea. To the north is the overground railway line.
- 12.7. This zone has outline planning permission through the Legacy Communities Scheme for 651 homes, 5,626 sqm of retail floorspace, 1,065 sqm of employment floorspace, 8,410 sqm of floorspace for community facilities, including a new primary school. This neighbourhood will be called Sweetwater.
- 12.8. Sweetwater will be in the south-west of the Park, near Old Ford and is set to create studios, flats and family homes with private gardens and communal green space alongside the Lea Navigation canal. As currently planned, it will be fully occupied by 2023.

Planning Delivery Zone 5 (PDZ5) – East Wick:

- 12.9. This includes land bounded to the west by the River Lee Navigation, to the south by the overground railway line, to the east by the Parklands and to the north by the Eastway. These areas exclude the Multi Use Arena, Press and Broadcast Centres and the Multi-Storey Car Park.

- 12.10. This zone has outline planning permission for 887 homes, 7,118 sqm of retail floorspace, 9,001 sqm of employment floorspace and 6,888 sqm of floorspace for community facilities, including a new primary and nursery school and 1,457 sqm of leisure floorspace.
- 12.11. East Wick will be in the north-west of the Park, next to Hackney Wick, framing the edge of the parklands and with a primary school and community centre at its heart. The East Wick neighbourhood will provide townhouses, maisonettes, mews, studios and flats. As currently planned, it will be fully occupied by 2020.

International Broadcast and Media Press Centres:

- 12.12. To the east, across the canal, there is an opportunity to create an employment hub to support digital and creative businesses in the former International Broadcast (IBC) and Media Press Centres (MPC). These have the potential to offer the most advanced digital infrastructure in Europe, with the scale, cost and quality of space that could make it one of the UK's premier destinations for digital and creative companies. BT sport has occupied 80,000 sq ft, with plans for a 250,000 sq ft data centre also within the former IBC. As part of the iCITY proposal Loughborough University is planning to occupy 65,000 sq ft to open 'Loughborough University in London', an academic campus that will offer postgraduate and executive education. Hackney Community College also intends to establish its new digital apprenticeship programme at iCITY alongside Tech Hub. This will develop and operate an incubator and accelerator space for start-up businesses.

Fish Island Mid and North:

- 12.13. Here there is the opportunity to create an integrated, mixed-use neighbourhood that is a dynamic mix of private and affordable residential, commercial and affordable workspaces, leisure, retail, entertainment and cultural uses that are all set within a high quality public realm and open spaces. Development here will provide sustainability benefits to the community that outweigh the risk of flooding. Fish Island Mid and North offer a unique opportunity to build upon Hackney Wick and Fish Island's unique legacy of innovation and creativity by protecting the area's existing independent and light industrial uses, and nurturing new and complementary employment opportunities that will help to reinforce the area's distinct local character.

Fish Island South:

- 12.14. Further south in Fish Island there is a Strategic Industrial Location (SIL) designation that incorporates the safeguarded Bow Midland West Rail site. The SIL designation will be retained as it currently plays an important industrial role within the wider area. Its proximity to strategic transportation networks also presents an opportunity for other ancillary uses to locate here that could benefit from the area's significant road, rail and water based infrastructure. The area could also be developed as a consolidation centre, specialising specifically in the transfer of freight between river and rail (See the 'Employment Hubs' Map within the Economy Chapter'). North of the SIL is the Wick Lane and Crown Close 'Other Industrial Location'. This has an employment led mix of uses including warehouse, storage, distribution and live work. There is some potential for limited residential development on Wick Lane, subject to Policy BEE.3.

Hackney Wick Station:

- 12.15. Around the station there is the potential to establish a neighbourhood centre comprising a wide range of business and other employment uses and new homes, in addition to the range of retail, service industry, cultural and community uses that might be expected in such a centre. This will be underpinned by the new Hackney Wick station entrance proposals, existing buildings, spaces, uses, new routes and open spaces. The centre should aim to provide a critical mass of mixed uses including employment, residential, retail and leisure. These will generate activity and provide a focal point for the Hackney Wick and Fish Island area. These uses should create a dense urban environment with a public realm that mixes intimate and contained areas that encourage active ground floor functions.
- 12.16. Across Fish Island Mid, North, and the potential neighbourhood centre, there is the scope to provide between 20,000-25,000 sqm of retail, leisure and community floorspace, and around 100,000 sqm of employment.

The Infrastructure Needed to Support Growth

- 12.17. Within this sub area, development opportunities and currently planned development will be served by an existing range of infrastructure.
- 12.18. The following additional infrastructure has also been identified as necessary.
- 12.19. **Community Facilities:** a Primary Healthcare Centre and a Community Use Area exist along the Eastway, but there are opportunities to build upon existing community facilities and accommodate further provision through new mixed use development.
- 12.20. **Schools:** there is an existing school within Hackney Wick (Gainsborough Primary School). A new primary school is planned within development to the south of the Hertford Union Canal at Neptune Wharf, and two further primary schools within the new areas of East Wick and Sweetwater.
- 12.21. **Movement Network:** a number of potential improvements have been identified and are reflected within the Legacy Corporation's draft Infrastructure Delivery Plan, including improvements to the pedestrian and cycle route under the A12 from Eastway to Mabley Green; further upgrade pedestrian/cycle connections over the A12 from Wallis Road to Cadogan Terrace; creation of a new link between Fish Island North and Fish Island Mid to provide a more direct route between the neighbourhood centre at Hackney Wick and Fish Island Mid (including options for enhanced crossings over the Hertford Union Canal); a new rail bridge connection across the River Lea at Autumn Street or Riverside Wharf (depending on the future of the Bow Midland East rail yard in Newham); and an upgrade of pedestrian and cycle facilities at the Wansbeck Road crossing, and from Dace Road to the Greenway. Hackney Wick Station provides a good level of local access to the rest of Hackney and Stratford Regional, including its significant railway and bus services, and direct London Overground rail services to other destinations. The sub area is also served by bus routes that pass through both Hackney Wick and Fish Island. These could be improved in connection with the improvements that are planned for Hackney Wick station. Overall the area is well served by public transport, but connectivity is poor.
- 12.22. **Heat Network:** development of physical connections across infrastructure barriers would allow the current heat network serving the Queen Elizabeth Olympic Park

and some adjacent development schemes to be extended to new and existing development areas within this sub area.

- 12.23. **Services:** the development of the neighbourhood centre will provide the opportunity to focus a new range of enhanced services within this sub-area. These will cater for a significantly expanding resident population and will be in addition to those already present along Eastway. The remodelling of Hackney Wick station will be used as an opportunity to integrate access to the station with the development of this new local neighbourhood centre. Access to the Metropolitan Centre at Stratford, and the regionally significant range of services located there, will also be improved.
- 12.24. **Parkland, Open Space and Waterways:** in establishing the Neighbourhood Centre around Hackney Wick Station a park should be provided in a waterside location between the Hertford Union Canal and the station.
- 12.25. The Legacy Corporation Infrastructure Delivery Plan identifies additional opportunities for public space south of Hertford Union Canal, specifically opportunities for new north-south green links around Beachy, Monier and Wyke Road; and a square with connections to and from the Greenway in Fish Island south adjacent to 417 Wick Lane.
- 12.26. The Infrastructure Delivery Plan also identifies Hackney Wick and Hackney Marshes flood alleviation and habitat enhancement as being a medium to long term priority, together with other shorter term strategic flood/surface water mitigation options. An upgrade of the crossing at Old Ford Lock is also required.
- 12.27. A Canal Park will be delivered alongside Sweetwater and East Wick.

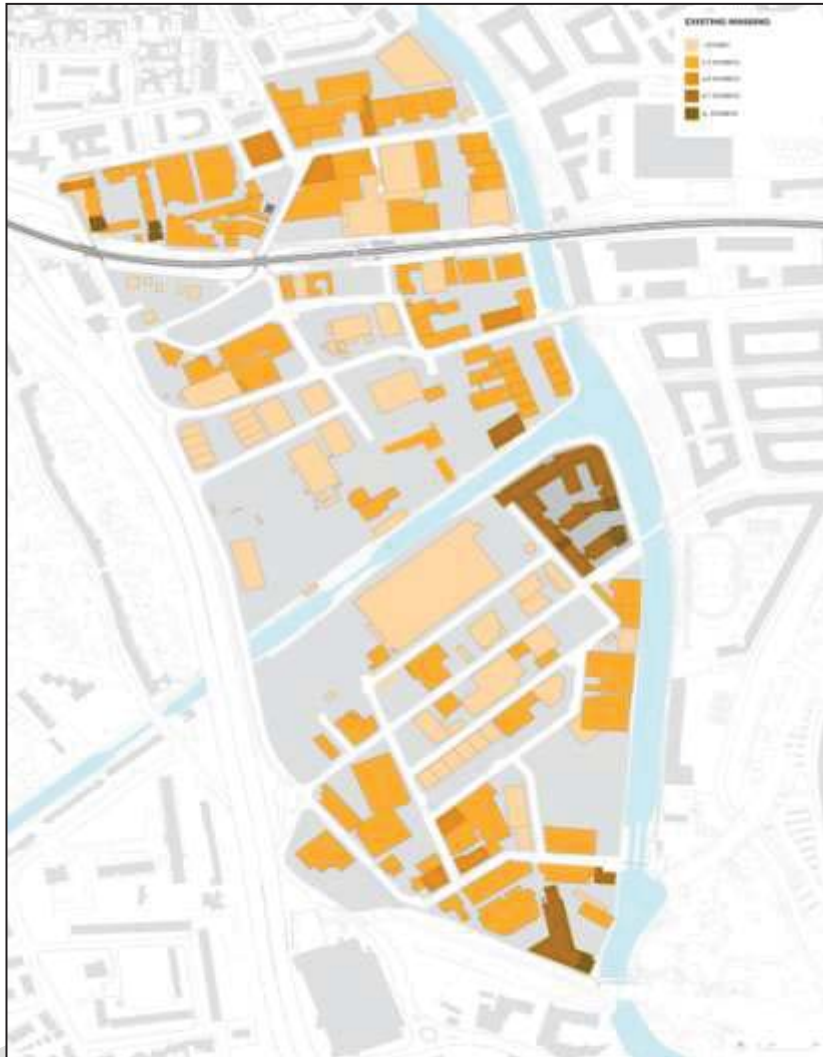
Policies for the Sub-Area

Policy SA1.1: Building Heights and Development Density

Building heights should reflect the existing massing of the area and generally be of 4-6 storeys, as indicated in Figure SA1.2. Taller buildings (above 6 storeys) will only be permitted in exceptional circumstances, either where they are close to the Neighbourhood Centre or relate well to the surrounding form of development and street environment. Table SA1.1 outlines appropriate height and density to ensure that there are no adverse impacts on heritage assets, including their settings and backdrops.

Table SA1.1	Height (storeys)	Density
Eastwick	2 – 6	142 units per hectare
Sweetwater		133 units per hectare
Neighbourhood Centre		Averaging 200 dwellings per hectare across all residential site opportunities; circa 2,500 units
Fish Island Mid and North		

Figure SA1.2: Existing Massing



Policy SA1.2: Improving Connections

Proposals for development within Sub Area 1 will be required to demonstrate that they contribute to local connectivity and strengthen internal connections by improving the existing street pattern to deliver a coherent and legible movement network that bridges internal and external barriers such as waterways and the A12, and that gives priority to public transport, pedestrians and cyclists. Refer to Figure SA1.3 - Proposed Connections.

Where applicable, the Legacy Corporation will expect applicants to create or enhance the following:

- Linear connections along east-west corridors, specifically helping to facilitate movement from existing and proposed bridges across the River Lee Navigation and the Queen Elizabeth Olympic Park.

- Direct, permeable and legible routes between the proposed Neighbourhood Centre and Dace Road, incorporating crossings over the Hertford Union Canal where appropriate.
- Passage through yards and building plots via a rigid path network.

Policy SA1.3: A Neighbourhood Centre

The Legacy Corporation will promote the delivery of a new Neighbourhood Centre north and south of the railway line in Hackney Wick/Fish Island, specifically within the area delineated by the allocation boundary. This area will offer a concentration of retail, community, leisure and service uses, set against a backdrop of existing employment activity, new residential developments, and reclaimed public space. Pivotal to the establishment of the Neighbourhood Centre will be the remodelling of Hackney Wick Station, and therefore proposals for development should contribute to the delivery of station improvements.

Proposals for development within the allocated neighbourhood centre boundary (see map at paragraph 12.34) should contribute to the Neighbourhood Centre function of the area by complying with the mix of uses defined within the allocation, promoting the activation of the public realm, ground floor frontages, and the nurturing of creative uses within existing yards and historic building clusters.

Policy SA1.4: Heritage-led Regeneration

The Legacy Corporation in its role as Local Planning Authority will work with its partners to ensure the retention of buildings with heritage value in order to support the diversity of uses that combine to give Hackney Wick and Fish Island its distinct sense of place. Heritage assets are intrinsic to both the historic identity and urban fabric of Hackney Wick/Fish Island, and the Legacy Corporation considers them essential to delivering heritage-led regeneration within this area.

Proposals for redevelopment within Fish Island Mid, North and the Neighbourhood Centre should demonstrate how they will improve the fragmented character of the area through the creation of new high quality buildings and/or the restoration of existing historic structures.

Where possible new development should remove barriers to the canal edge, retain or contribute to the provision of affordable workspace, and avoid street geometries (height/width ratios) that would create adverse micro-climatic effects.

The Legacy Corporation will expect applicants to demonstrate how their proposals ameliorate severance, reinforce local identity, and sustain the value and positive characteristics present within Fish Island Mid, North and the Neighbourhood Centre.

Policy SA1.5: Conservation Areas:

The existing Hackney Wick and Fish Island Conservation areas will be retained and further scoping undertaken to explore the potential for extending these to encompass other historic/architectural elements within this sub-area, whether physical or environmental, in accordance with Policy HBE.3 (within the Historic and Built Environment Chapter of the plan)

Policy SA1.6: Community Facilities

Proposals for new community facilities will be supported where these are within the proposed Neighbourhood Centre or exceptionally in other locations where it can be demonstrated that they are easily accessible to the communities that they are intended to serve.

Policy SA1.7: Heat Networks and Renewable Energy

New development and infrastructure, including highways and bridges, should make allowance or provision for the future introduction of heat network infrastructure. Proposals for renewable energy generation will, subject to the other policies within this plan, be supported.

Policy SA1.8: Flood Risk

The Legacy Corporation will work in partnership with surrounding boroughs in support of strategic flood mitigation measures, seeking to reduce risks from flooding.

The Sequential and Exceptions Tests will be applied to development proposals located within Flood Zones 2 and 3. Development will only be permitted subject to satisfaction of the NPPF Sequential and Exception tests.

Site specific Flood Risk Assessments will be required as set out in the NPPF. The applicant must demonstrate that a development will provide wider sustainability benefits to the community that outweigh flood risk for an Exception Test to be passed.

Development proposals will be expected to incorporate high standards of surface water management, flood resilience and sustainable design - including appropriate use of SUDS, finished floor levels and biodiversity. Development proposals should contain safe access, refuge and evacuation procedures where necessary.

Site Allocations

Sweetwater:

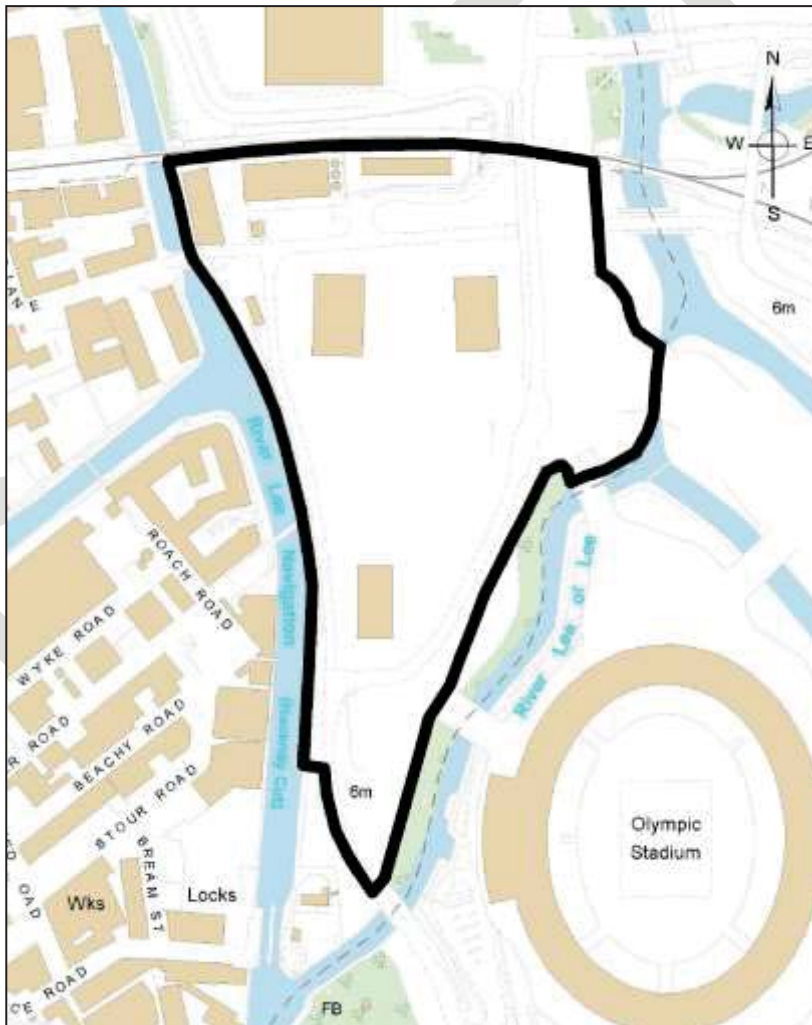
- 12.28. Sweetwater is an area between the Lee Navigation and River Lea which is suitable for a low to mid-rise residential neighbourhood of 651 homes, alongside a new primary school, playing fields, local amenities and community facilities. Here there is the opportunity to define a clear built edge that integrates the existing King's Yard

Energy Centre into the urban fabric, whilst framing key routes into the Park from both Hackney Wick and Fish Island. Sweetwater should include a mix and amount of uses in accordance with the Table SA1.2 below:

Table SA1.2: Permitted new development floorspace/units within Sweetwater

Use	Floorspace sq m
Retail	5626 (PDZ 4)
Employment	1065 (PDZ 4)
Community Facilities	5014 (PDZ 4)
Primary School/Nursery School	3396 (PDZ 4)
	Units:
Residential	651

12.29. Sweetwater's character will be defined by the canal-side open space to the west, and the South Plaza and parklands along the River Lea to the east. The number of units may vary depending on the mix and size of those delivered.



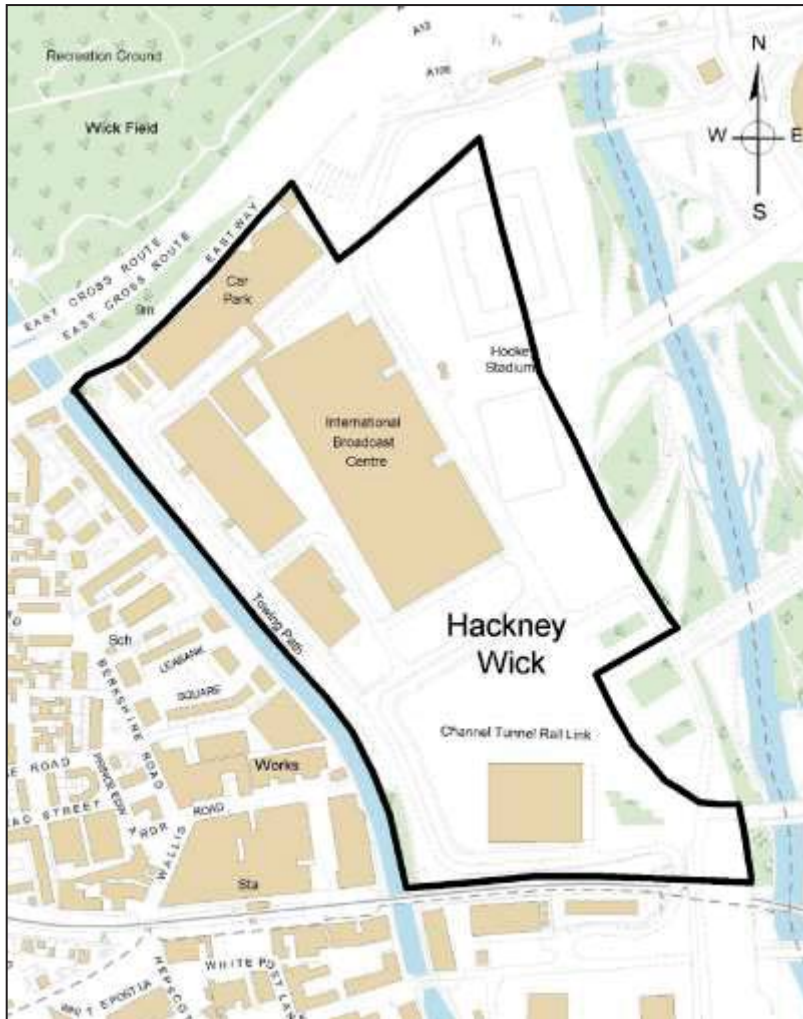
East Wick and iCITY:

- 12.30. An area suitable for a mix of uses, which includes 887 new homes, a new primary school, a canal side park, a new hub of employment and education use, with a supporting element of retail in accordance with the floorspace mix set out in Table SA1.3.
- 12.31. New development will be focused between the Copper Box and the former Olympic International Broadcast Centre, and between Waterden Road and the permanent Queen Elizabeth Park parklands to the east.
- 12.32. New development should be configured to enable the creative uses emerging in Hackney Wick to extend eastward to consolidate the new hub for creative businesses and shops being delivered around Waterden Road. New community and commercial uses should overlook the principal public route from Wallis Road across the River Lee Navigation to Waterden Road, and seek to encourage the shared use of social space and generate activity between the residents of East Wick and the wider neighbourhoods to the west.

Table SA1.3: Permitted new development floorspace/units within East Wick

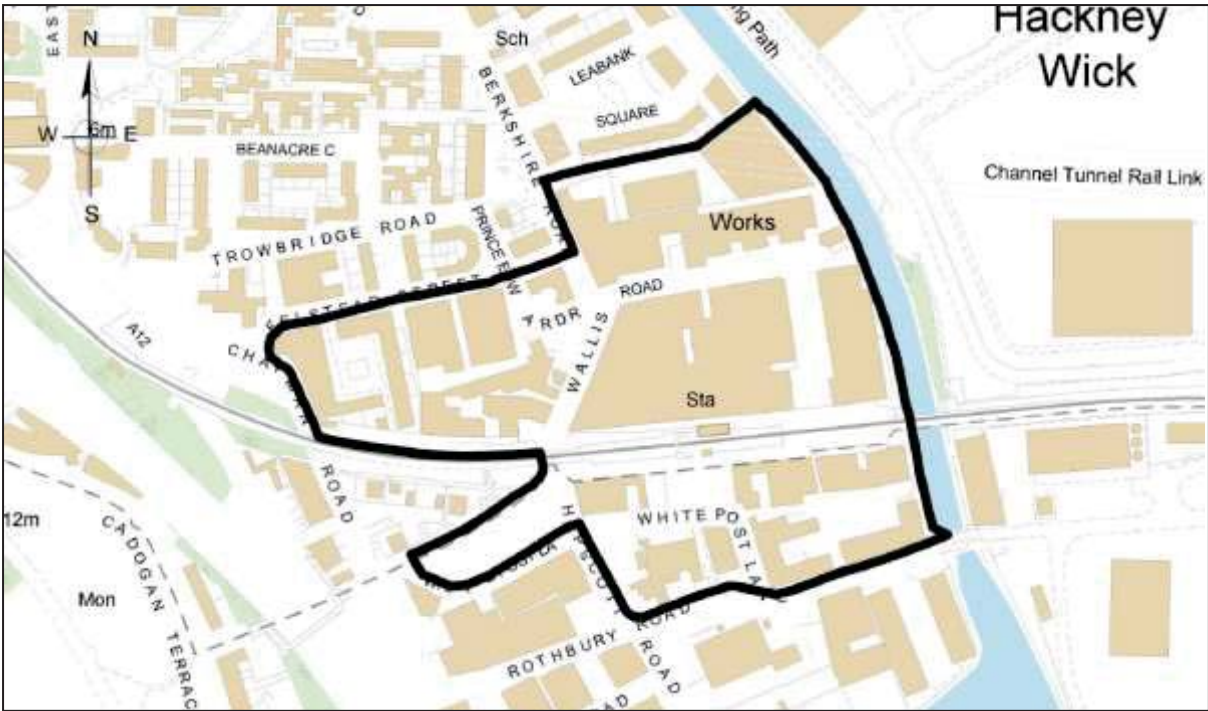
Use	Floorspace sq m
Retail	7118 (PDZ 5)
Employment	9001 (PDZ 5)
Community Facilities	1616 (PDZ 5)
Leisure	1457 (PDZ 5)
Primary School/Nursery Schools	5272 (PDZ 4)
	Units
Residential	887

- 12.33. The number of units may vary depending on the mix and size of those delivered.



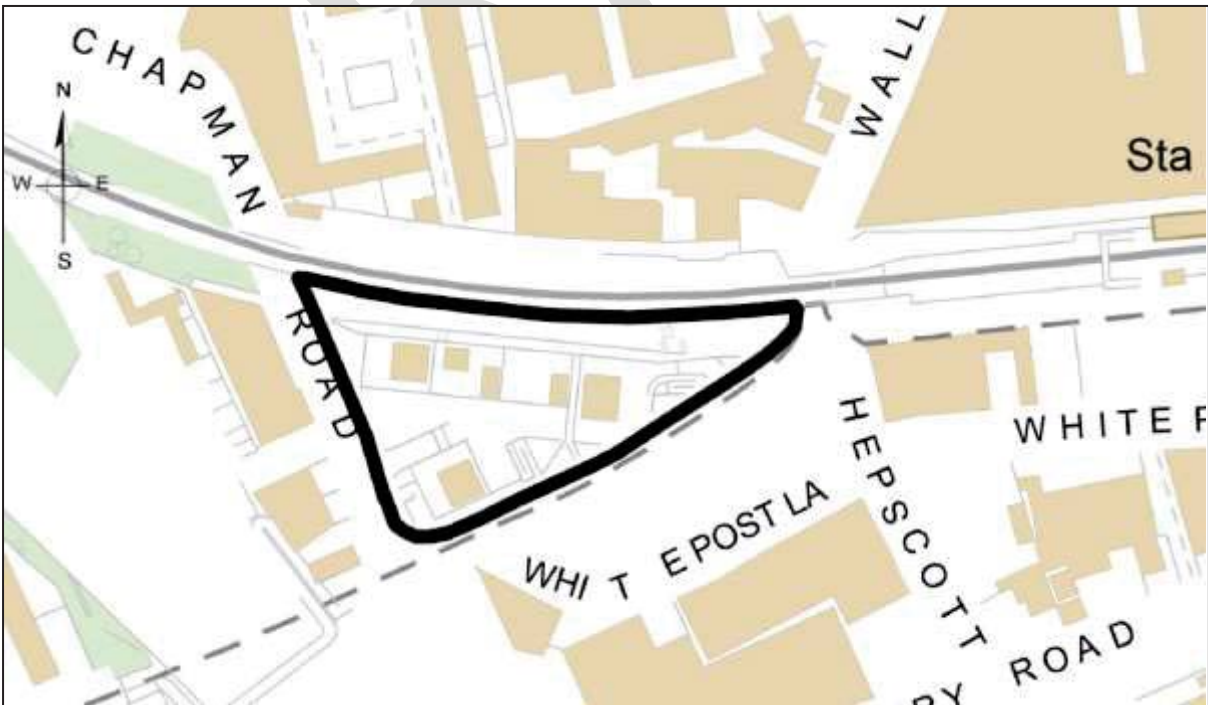
Neighbourhood Centre:

- 12.34. An area suitable for the development of a dense and multi-functional local neighbourhood centre north/south of the railway line and around the proposed new entrances to Hackney Wick station. The centre will be the meeting place at the heart of the new Hackney Wick/Fish Island and will see a concentration of A1, A3, A4 and D1 uses together with new C3, and B1 opportunities connected by new routes and public spaces.



Chapman Road:

12.35. The site delineated below is currently in use as a traveller site with temporary planning permission but has been constructed on a more permanent basis. The Local Plan proposes to allocate this land as a traveller site in order to help meet the permanent and transit accommodation needs of travellers within the Legacy Corporation Area.



Other Local Plan Designations within this Sub-Area:

Fish Island South:

- 12.36. Employment Hubs 3 and 10 fall within Fish Island South. Refer to Policies BEE.2 (for Hub 3) and BEE.3 (for Hub 10) within the Business, Economy and Employment section of the Plan.

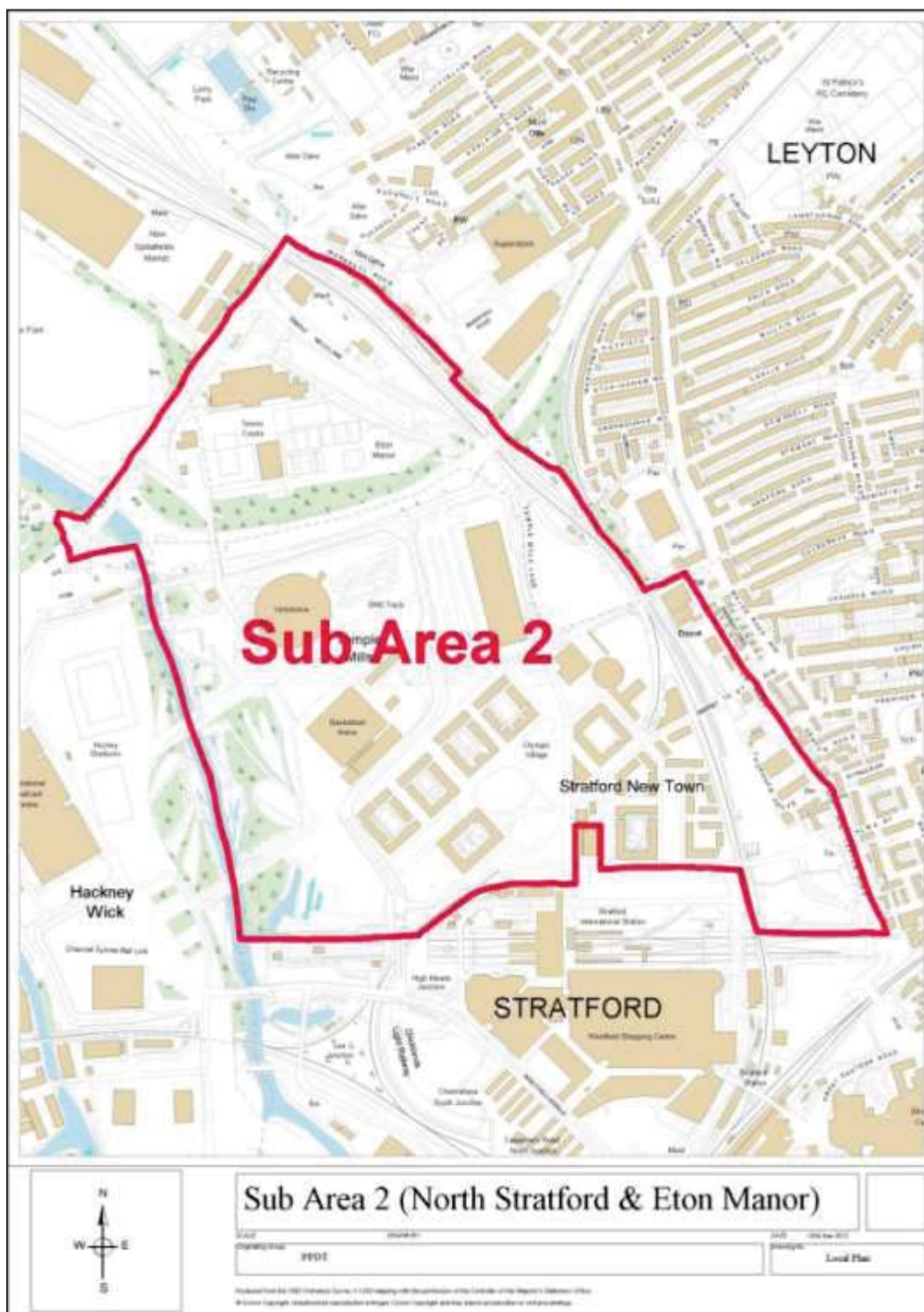
Fish Island North:

- 12.37. Employment Hub 2 (Policy BEE.2), Hub 5 (Policy BEE.3), Hub 6 (Policy BEE.3), Hub 7 (Policy BEE.3), Hub 8 (Policy BEE.3) and Hub 9 (Policy BEE.3) fall within Fish Island North. Refer to Policies identified within the Business, Economy and Employment section of the Plan.
- 12.38. Further allocations within this Plan relate to Sub-Area 1; specifically Metropolitan Open Land designations which encompass the Greenway, North West Parklands, and land to the south of Sweetwater.

References and evidence base

- London Plan, Greater London Authority, 2011
- Mayor's Olympic Legacy Supplementary Planning Guidance, 2012
- Hackney Wick Area Action Plan, London Borough of Hackney, 2012
- Draft Hackney Wick Conservation Area Appraisal, London Borough of Hackney, 2009
- Fish Island Area Action Plan, London Borough of Tower Hamlets, 2012
- Fish Island Conservation Area, Character Appraisal and Management Guidelines, London Borough of Tower Hamlets, 2009
- Hackney Wick Fish Island Design and Planning Guide, London Legacy Development Corporation, 2013.
- Legacy Development Corporation Infrastructure Delivery Plan Study Report, URS, 2013
- Legacy Communities Scheme Planning Application: 11/90621/OUT (London Legacy Development Corporation, 2012)

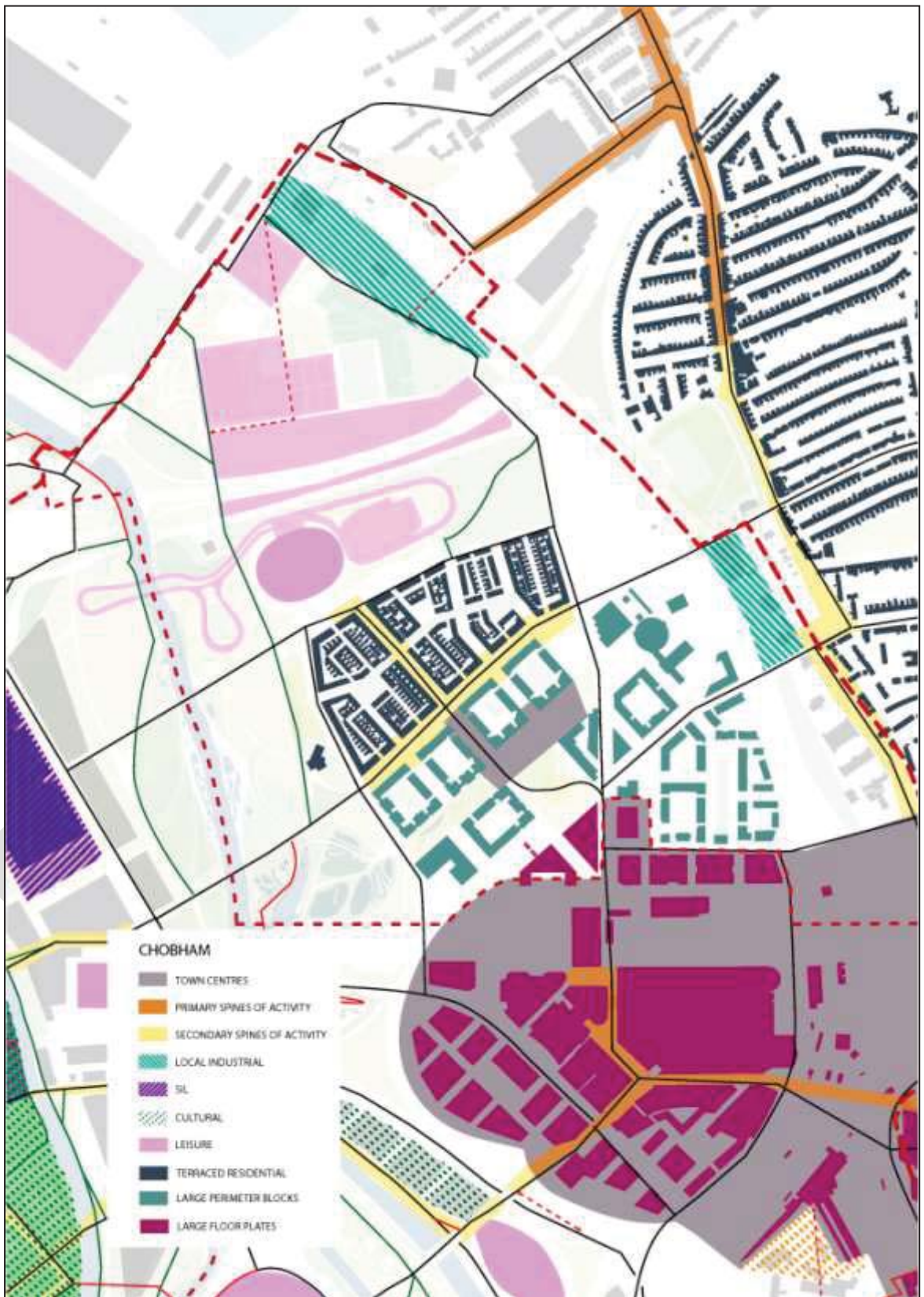
13. Sub Area 2 – North Stratford and Eton Manor



13.1. Sub Area 2 sits to the north of Stratford Town Centre and incorporates the following:

- the new residential area of East Village, the housing used temporarily during the 2012 Games as the Athletes Village and the Chobham Academy all age school and sixth form and including a significant local park and sufficient retail floorspace to form a Local Centre;
- the Chobham Manor family housing focused residential area, with planning permission for up to 960 homes, a local park capable of serving the development and the wider local community, with an element of retail and other non-residential use;
- to the north of this, the Lee Valley Velo Park, including the Velodrome, and within its parkland setting BMX, Mountain biking and road cycling facilities;
- to the west of these locations, sit the northern parklands of the Queen Elizabeth Olympic Park and the River Lea, including the public facilities and play areas within the Timber Lodge (North Park Hub) and Tumbling Bay Playground, while to the south, is an area of wetlands and the confluence of the Channelsea River and River Lea;
- to the north of the Velopark is Eton Manor consisting of [an indoor sports centre of 10 tennis courts, 4 of which are located within the sports centre; the remaining a hockey pitch; and a 3,000 seater hockey stadium; separate five-a-side football pitches are proposed in the northern corner of the site; plus a 1.2 hectare area for allotments, adjoining this to the east is the Temple Mills Bus Garage;
- to the east of East Village and to the west of Leyton Road, is the Chobham Farm area, an area of local employment use, including the Thornton Grove business park area, much of this area having been identified for transition from employment use to a residential led mixed use area in the Newham Core Strategy 2012.

Figure 13.1 Relationship with surroundings



13.2. Figure 13.1 shows the context of the sub area surroundings, with Leyton to the north, Maryland and Stratford Village to the East, predominantly areas of 19th Century terraced housing, incorporating Leyton town centre and station and London Legacy Development Corporation Local Plan Interim Consultation Document/draft/vs0.1 PROTECT - POLICY

Maryland Station. To the south is the developing Metropolitan Centre of Stratford, including the Regional and International Stations, with the significant retail, service, leisure and commercial functions associated with this centre.

Vision for Sub Area 2

The location for three vibrant new residential communities, with a focus on family housing, set alongside the Queen Elizabeth Olympic Park parklands and with generous new local open spaces, good local connections to Leyton in the north, Maryland to the east and Stratford Metropolitan Centre in the south and to the employment opportunities at iCity and wider Hackney Wick to the west, with a hub of sporting activity at Eton Manor and the Velopark.

Opportunities for Change and Development

- 13.3. An area of significant recent change and development, significant elements of planned development have yet to come forward, although the vast majority of this remaining development capacity has outline or detailed planning permission and is considered to have a high potential for being delivered within the plan period to 2031.
- 13.4. **Eton Manor** - Eton Manor lies at the north end of the Queen Elizabeth Olympic Park, to the south of the New Spitalfields Market and the open space and playing fields of East Marsh. It comprises an indoor sports centre of 10 tennis courts 4 of which are located within the sports centre; the remaining a hockey pitch; and a 3,000 seater hockey stadium; separate five-a-side football pitches in the northern corner of the site are proposed but not yet built; a 1.2 hectare area for allotments to the east of the Eton Manor sporting venues are also planned and 179 parking spaces spread across the northern part of the site including 15 accessible spaces, including five accessible spaces for the allotments.
- 13.5. The Eton Manor war memorials (Eton Manor or Villiers Memorial and the Churchill memorial) are to be relocated to a new plaza to the west of the new Eton Manor sports centre, on one of the main approaches to the building. The site as a whole is owned and operated by the Lee Valley Regional Park Authority.
- 13.6. **Temple Mills** – Sitting between Temple Mills Lane and Eton Manor, the site is identified in this Plan as a Preferred Industrial Location and contains the Temple Mills Bus Garage. It is not considered that this represents an opportunity for change in use within the lifetime of the Plan.
- 13.7. **Chobham Farm** – site allocation for up to 1100 residential units, local park with an element of retail and other compatible non-residential uses, concentrated along Henrietta Street. Potential for additional pedestrian link to East Village. A need for improvement to the public realm and more active frontages along Leyton Road.
- 13.8. **East Village and Chobham Academy**, the area containing the 2818 homes initially used as the 2012 Athlete's Village and the Chobham Academy all age school, and significant local park and formal open spaces, this area has significant capacity to deliver additional, predominantly residential, development within the remaining development plots as set out in the Stratford City planning permission. The established urban form focuses tall buildings close to the Stratford International

Station with a high to medium density in blocks up to 10-11 storeys in height across the area as a whole.

- 13.9. **Chobham Manor**, a part of the Legacy Corporations Legacy Communities Scheme, the zonal masterplan includes 835 new homes, 3,740 m² of non residential floorspace, 2,310m² of retail. A medium density residential area, building heights will generally range from 6-7 storeys along the most active street frontages down to 3-4 storeys on quieter streets and along mews elements. This steps down from the higher and denser development at East Village to allow the urban form to integrate with its wider and lower surroundings. Housing typologies range from apartments to maisonettes and also include a significant number of terrace houses with gardens. A central west to east spine of open space is provided in the form of three 'greens' which each incorporate areas of playspace. A Community Hub is proposed at the eastern end of the zone at the junction of Temple Mills Lane and Honour Lea Avenue of up to 1,141m².
- 13.10. **Lee Valley Velopark** is located in the northern part of the Queen Elizabeth Olympic Park on either side of the River Lea. The site is bounded by Waterden Road to west (which falls within Sub Area 1), Temple Mills Lane to east & the Northern Loop Road & A12 to the north. To the south are the wider QEOP parklands and development platform for Chobham Manor, along with East Village and Stratford City.
- 13.11. Lee Valley Velopark development comprises: the Velodrome and BMX facilities and associated one mile cycle circuit and over 6.5km of trails for off-road mountain bike cycle trails. The trails will extend within and around the cycle circuit, and will extend up to Eton Manor via a new bridge. 163 car-parking spaces support the VeloPark (8% of which are designated spaces for blue-badge holders).

The Infrastructure Needed to Support Growth

- 13.12. Within this sub area, the development opportunities and currently planned development are directly served by an existing range of infrastructure which includes
- 13.13. **Chobham Academy** is an all age academy school which will have a total capacity of 1990 places when full, including nursery and sixth form provision.
- 13.14. **East Village Heath Centre**, the 'Sir Ludwig Guttman Health & Wellbeing Centre' consists of 3,800m² of accommodation for NHS primary care needs, capable of serving a population beyond that of this sub area, and 1,500 m² for the East Village Community Development Trust.
- 13.15. **Community Facilities** – In addition to the East Village Community Development Trust space at the East Village Heath Centre, a community hub is to be provided as part of the Chobham Manor development. Approximately 500 metres away from the eastern boundary of the area in Chandos Road is the London Borough of Newham operated Chandos Centre, community facility. Immediately to the west of Chobham Manor within the Queen Elizabeth Olympic Park is the Timber Lodge (North Park Hub) which provides community space in a single storey multi-functional building, a café and an outdoor neighbourhood play space.

- 13.16. **Town and local centre services** A sufficient range of non-residential floorspace has been permitted/built within the East Village⁶ area (excluding that which falls outside of the extended Stratford Town Centre boundary) and sufficiently concentrated to form a Local Centre within the retail hierarchy, providing predominantly convenience retail floor space. Smaller scale and more dispersed provision for non-residential uses is allowed within the Chobham Manor scheme. These will be concentrated along Honour Lea Avenue, the street running east-west between Chobham Manor and East Village and most likely to have considerable footfall as it is a key route to the Park. A full range of town centre services is available close to the sub area within the established Stratford Town Centre and within the town centre extension area that includes Westfield and the International Quarter.
- 13.17. **Heat network.** The East Village and Chobham Manor are served by the Queen Elizabeth Olympic Park and Stratford City energy centres and the associated existing heat network. All new development within these areas will have the opportunity to utilise connections to this. There are opportunities available for this network to be extended to serve Chobham Farm and also development beyond this outside of the Legacy Corporation area, where such extensions are found to be technically and financially achievable.
- 13.18. **Highways Network.** The area is served by an existing highways network with no physical opportunities available to increase highway capacity given the constrained urban form. The range of development schemes within the sub-area provide for an adequate range of local streets and walking and cycling routes and connections.
- 13.19. **Public Transport.** Access to significant levels of public transport services are available within a relatively short distance at Stratford Regional Station, Stratford International Station and Stratford and Westfield bus stations, with the sub area locality well served by bus routes.
- 13.20. Additional infrastructure need associated only with this sub-area is limited to that of improved local connectivity and improved public realm.
- 13.21. **Parkland, open space and water environment.** The north eastern elements of the Queen Elizabeth Olympic Park parklands, the substantial Victory Park and Glades Walk open spaces within East Village and Chobham Academy School playingfield, along with a range of smaller local open spaces and play spaces provide a significant contribution to the quality and liveability of the local environment that is developing in this location. Policies NE8 and NE9 provide a formal protection through either Metropolitan Open Land and Local Open Space designation, or both. The water environment associated with the River Lea, Channelsea River and associated wetlands are also afforded protection through Policies NE4 Biodiversity and NE3 Waterways.

⁶ As of June 2013, approximately 3,500 m² retail space had been constructed or had detailed planning consent, with an equivalent amount yet to come forward in detail but permitted in outline by the Stratford City Planning permissions). The significant element of local retail floorspace being under 10,000 m² this falls into the category appropriate to a Local Centre within the retail hierarchy. Figure 5.2 identifies the Local Centre at the point at which this floorspace is most concentrated.

Policies for the Sub-Area

Policy SA2.1: Housing Typologies

Proposals for development within Sub Area 2 should provide a mix of housing typologies, with an emphasis on the inclusion of housing appropriate for families, except in those specific locations where the Plan indicates that tall or high-density buildings would be acceptable. Typologies should relate directly to, and reinforce, the street hierarchy. A holistic view should be taken to any given development to ensure the objective of creating Lifetime Neighbourhoods is able to be realised.

Policy SA2.2: Housing densities

Proposals for development within Sub Area 2 should conform to the emerging medium density character of the area, with a general decrease in density with distance from Stratford Town Centre (including the town centre extension defined at Policy BEE7 in this Plan and as indicated in Figure SA2.2.

Table SA2.1: Permitted Density Ranges for schemes within the sub-area

Scheme	Permitted Density Ranges
1. Chobham Manor	Medium to Low Density 140 – 209 units per hectare* (450 – 650 hrha)
2. Chobham Farm	Medium to Low Density 175 – 212 units per hectare* (560-680 hrha)
3. East Village	Medium Density 187 – 645 units per hectare (599-1999 hrha)
4. East Village (adjacent to the International Station)	High Density

*extrapolated from habitable rooms per hectare range permitted within the permitted scheme

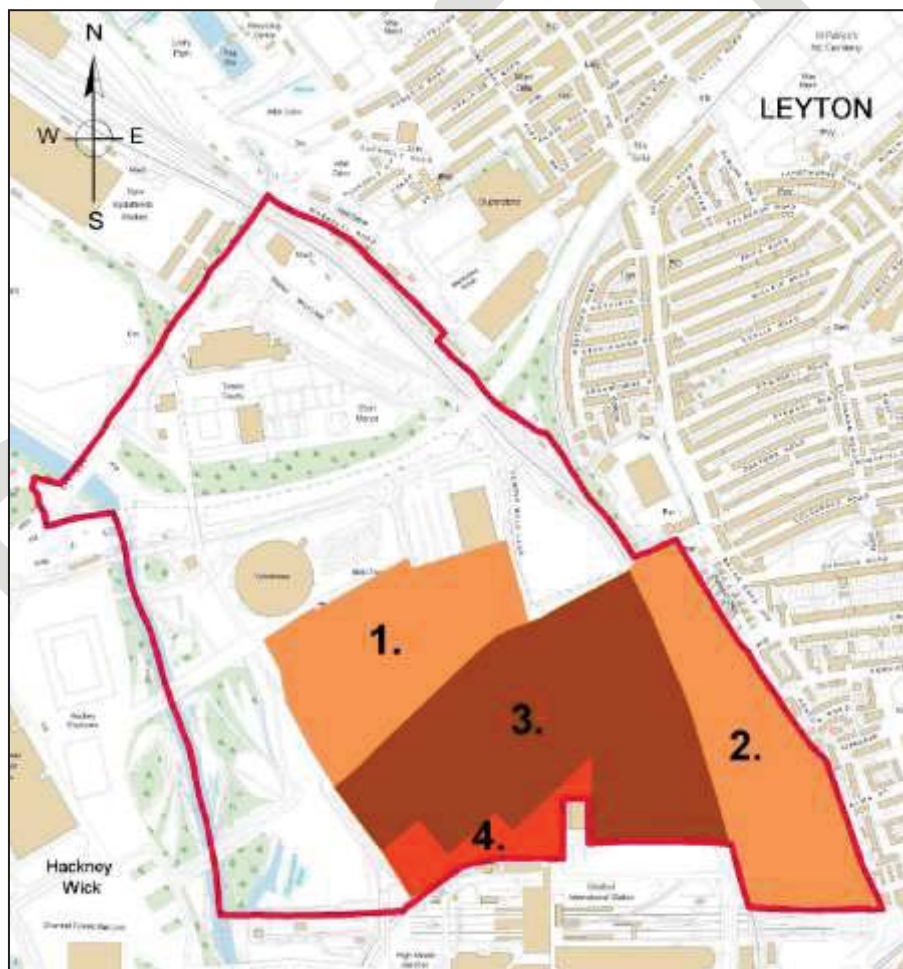
Policy SA2.3: Building heights

Proposals for development within Sub Area 2 should respect and not exceed the development heights indicated in Table SA2.2 and Figure SA2.2. Building heights should generally decrease with distance from Stratford Town Centre (including the town centre extension defined at Policy BEE7 in this Plan.

Table SA2.2 Building Heights

Scheme	Building Heights
1. Chobham Manor	Up to 7 storeys along main routes. 3-4 storeys along quieter streets.
2. Chobham Farm	Up to 6 storeys, with moderate variation in heights along Leyton Road and higher elements along south side of Henrietta Street of up to 10 storeys.
3. East Village	Up to 11 storeys
4. East Village (adjacent to the International Station)	Up to 50 Storeys
All other parts of the sub area are protected as Metropolitan Open Land and or Local Open Space and not generally appropriate for new built development.	

Figure SA2.2: Building Heights and Densities Map



Policy SA2.4: Leyton Road - Improving the public realm

The Legacy Corporation in its role as Local Planning Authority will work with its partners to promote improvements to the public realm along Leyton Road.

Proposals for new development which have a frontage to Leyton Road should be designed to improve the streetscape and will be expected to contribute to improvement of the public realm.

Policy SA2.5: Improving connections

The Legacy Corporation in its role as Local Planning Authority will work with its partners to promote improved connectivity along and across Leyton Road to improve access between East Village, Chobham Farm, Maryland and Leyton. Connective routes should have a high quality streetscape and be lined by active frontages where this is possible.

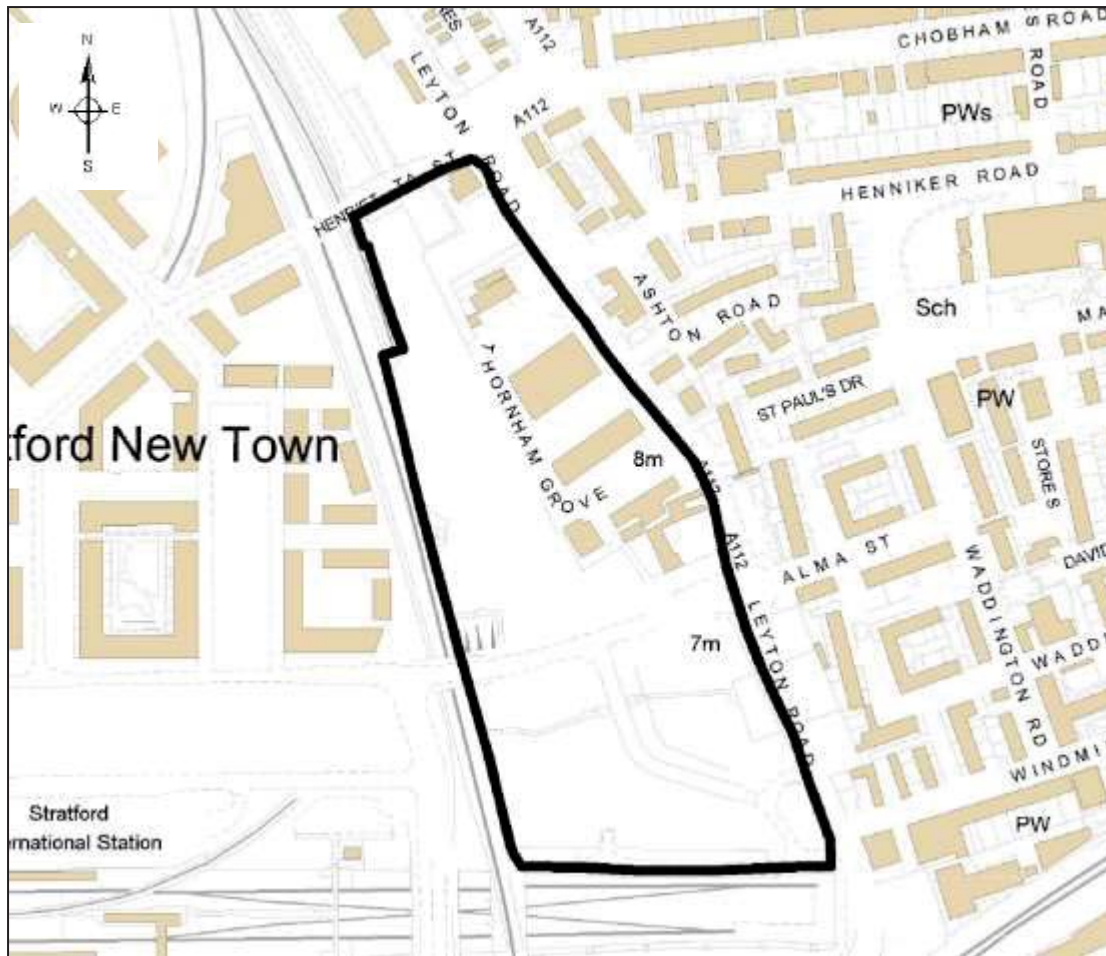
Proposals for new development will be expected to facilitate the future provision of new routes to connect the new and established wider areas and street patterns.

Policy SA2.6 Non-residential uses

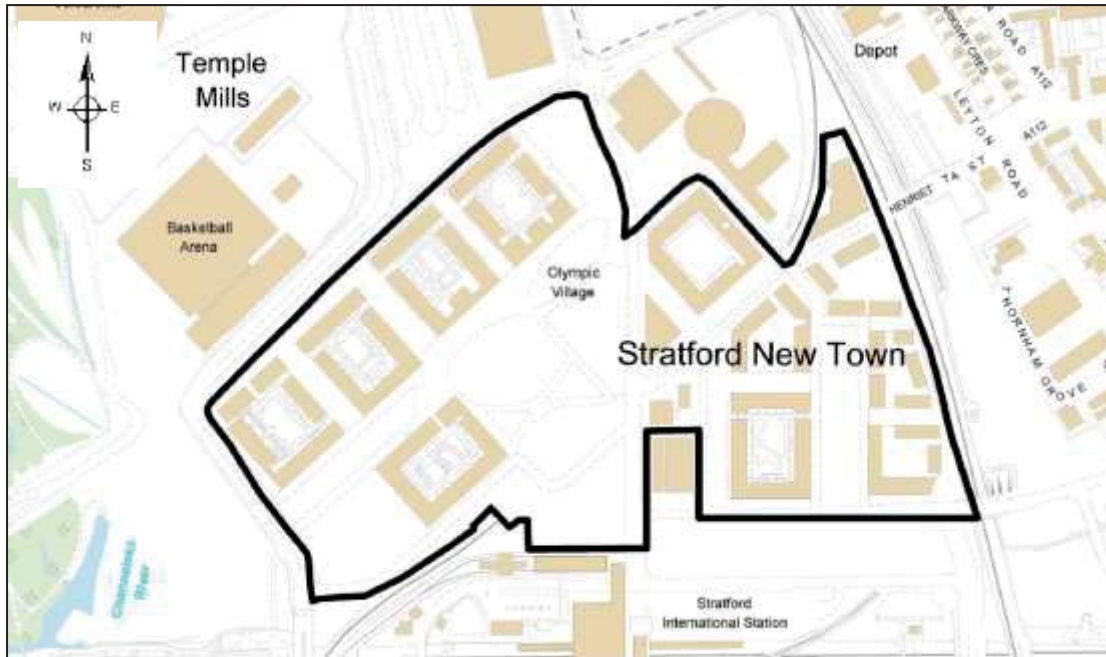
Non-residential uses Use Classes A1 – A5 and B1a within Sub Area 2 should be generally of a small scale and serve localised need. Larger scale uses should normally be located outside the sub area and within a town, district or neighbourhood centre, appropriate to the scale and nature of that use. These uses should be located along key routes, and/or in relation to local public spaces.

Site Allocations

- 13.22. **Chobham Farm:** Up to 1100 new homes, including a significant proportion of family homes, a local park, community facility and a minor element of other uses (predominately within use Use Classes A1 to A5 and B1a).



13.23. **East Village:** In addition to the existing 2818 homes, capacity for approximately 2388 additional new homes in a range of height, densities and typologies consistent with that indicated in Tables SA2.1 and SA2.2 and in Figure SA2.2, with a range of ancillary uses (predominately within Use Classes A1 to A5 and B1a) not exceeding a cumulative total of 9999m² in accordance with the identified Local Centre designation.



13.24. **Chobham Manor:** Up to 960 new homes, including a significant proportion of family homes, a local park and a minor element of other uses (predominately within use Use Classes A1 to A5 and B1a) to serve local needs and along main road frontages, those of Velopark users.



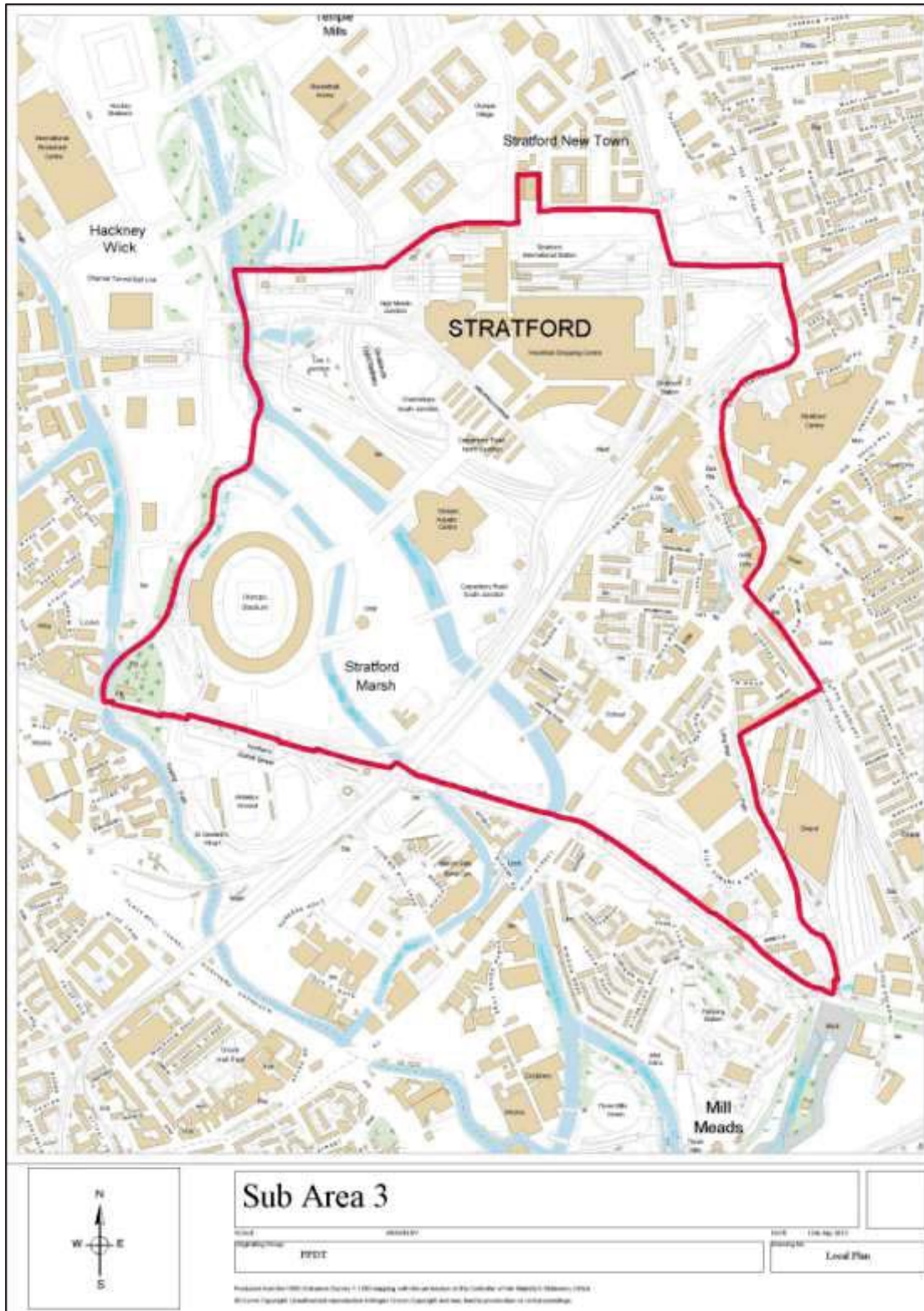
References and evidence base

- Legacy Development Corporation Infrastructure Delivery Plan Study Report, URS, 2013

- Stratford City Outline Planning Application 07/90023/VARODA and associated planning applications and detailed approvals
- Olympic, Paralympic and Legacy Transformation Planning Application 07/90010/OUMODA and associated planning applications and detailed approvals.
- Legacy Communities Scheme Outline Planning Application 11/90621/OUTODA and associated detailed approvals
- Chobham Farm Planning Application, 12/00146/FUM
- London Borough of Newham, Core Strategy, 2012
- Stratford Metropolitan Masterplan, London Borough of Newham, 2011
- Mayor's Olympic Legacy Supplementary Planning Guidance, 2012

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14. Sub Area 3 – Central Stratford and the Southern Queen Elizabeth Olympic Park



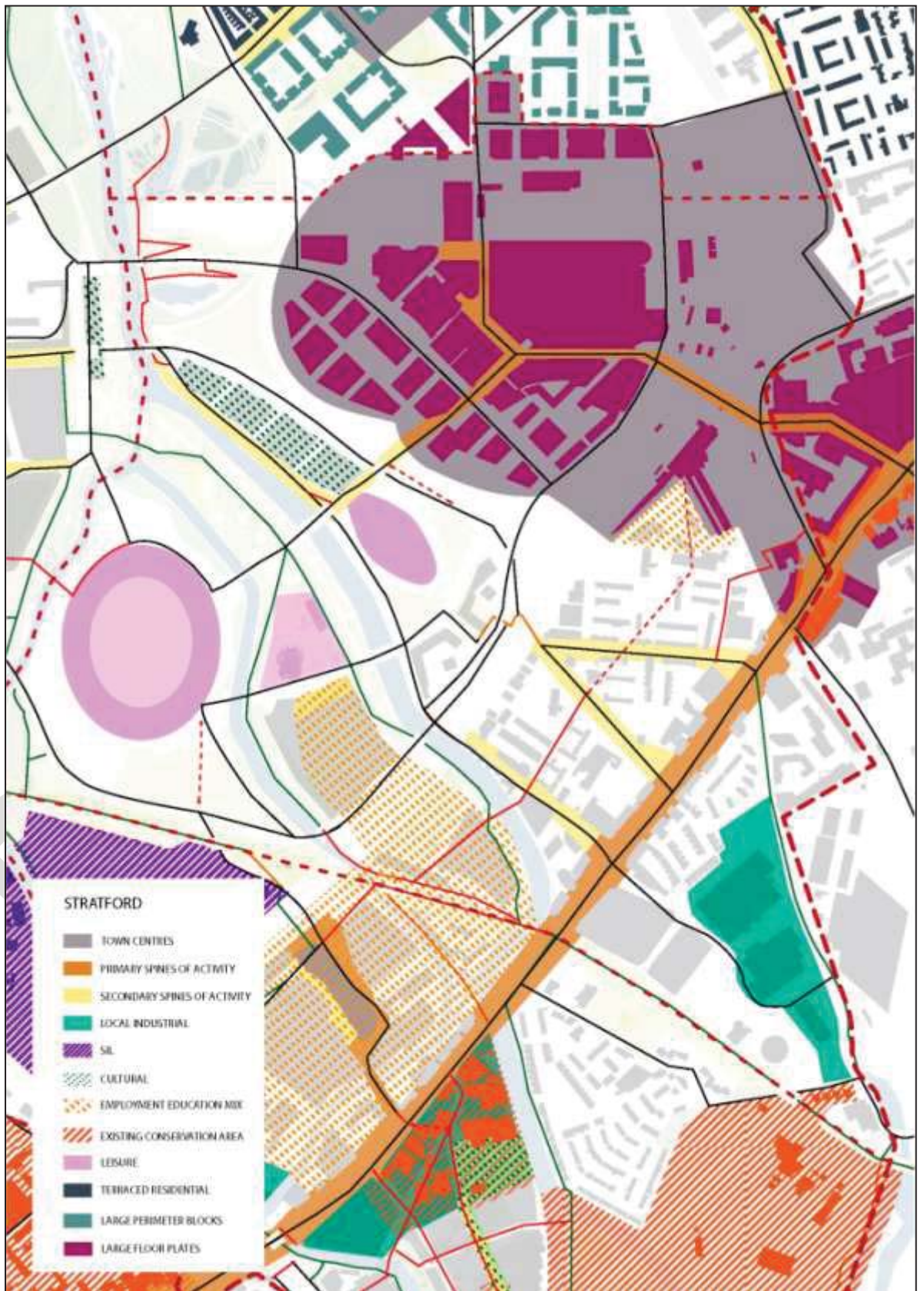
14.1. Sub Area 3 sits over the western part of Stratford and incorporates the following:

- Westfield Stratford with its retail and leisure focus and The International Quarter as a future focus for high grade office development, in its northern area and including Stratford International Station, currently served by High Speed 1 Regional Train services with capacity to be served by international trains.
- Chobham Farm South, a vacant site sitting within a triangle of railway lands accessible from Angel Lane.
- Stratford Regional Station, with a wide range of national, regional and local rail services, alongside London Underground and DLR services.
- Land set between Great Eastern Road and railway lines to its west comprising the office and residential buildings in its southern part, the main Stratford Bus Station to the north of this and beyond this towards the junction of Great Eastern Road and Angel Lane, an area with planning permission for office and residential development, including student housing.
- The Greater Carpenters area includes a range of residential, business and education use, including the Building Crafts College, the University of East London Duncan House campus, Carpenters Primary School and the London Borough of Newham Carpenters Housing Estate. The northern frontage of Stratford High Street and eastern side of Warton Road predominantly comprise new apartment blocks and a small number of smaller vacant sites.
- The triangle of land between the Waterworks River and the Greenway, currently used in conjunction with Crossrail works has planning permission for new allotments and residential development, phased for delivery following Crossrail completion.
- To the east of Rick Roberts Way in the south of the sub area are the established residential area around Wise Road and Kerrison Road, the mixed business and residential area around Cam Road and Burford Road and the established business premises at Rick Roberts Way.
- To the West of Rick Roberts Way is the former Olympic Games Transport Mall site, identified as a site for a secondary school and housing as part of the Legacy Communities Scheme, and south of this a decommissioned Gas Holder site and a row of listed former Thames Water cottages at Abbey Lane.
- The western most part of the area contains the former Olympic Stadium, with the proposed Community Athletics Track and associated facilities immediately to its south within the island enclosed by the River Lea, City Mill River and to the south by the Greenway.

- To the east of this, the land between the City Mill River and Waterworks River, is divided by the AcelorMittal Orbit and the South Park Hub building, with the area to the north forming a series of events spaces and gardens as part of the Queen Elizabeth Olympic Park parklands, while to the south is an area of vacant land identified for development as part of the Legacy Communities Scheme.
- Further to the east, on the east bank of the Waterworks River is the Aquatic Centre with the land to its north and south cleared of it's 2012 Games time structures and forming development land which is part of the Legacy Communities Scheme.

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Figure 14.1. Relationship with surroundings



- 14.2. This sub area encompasses the places that have the greatest importance in achieving the vision and objectives of the plan as a whole, including the proposed Stratford Town Centre extension area, the commercial heart, the Legacy Stadium and Aquatics Centre and southern Queen Elizabeth Olympic Park, providing an area of sporting and leisure focus. The sub area also provides the opportunity for the development of education provision, including postgraduate and research facilities along with further major cultural and leisure uses.
- 14.3. The wider Stratford Town Centre, both that within and outside of the Legacy Corporation area, provides an important focal point for development and growth within East London, established around its excellent transport links. The integration of the established Town Centre and the new is one of the most important elements relationships for this sub area. The integration of these two elements through the delivery of recent development and public realm improvements provides a basis for its Metropolitan Centre status, with significant additional development that has planning permission but has yet to be delivered reinforcing this in the future. As further development comes forward on both sides of the Greater Eastern Road, further potential to reinforce this integration will be presented. The potential to reconfigure the Stratford Gyratory system from one to two way traffic working also provides a route to achieving further spatial integration. With the prominent function of this location, the wider relationships are then ones that are focused on the routes which radiate out from Stratford to the other sub areas. The context and relationship with the surroundings are indicated in Figure 14.1.
- 14.4. The sub area provides a strategic focal point for the other sub areas, as a sub regional transport hub and Metropolitan Centre, with public transport and highways routes providing the linkages to and through Stratford, new bridges and routes through the southern Queen Elizabeth Olympic Park help to reinforce this focus.

Vision for the Sub area

A thriving centre for business, retail, leisure, cultural, visitor and sporting activity, incorporating new and existing residential communities, set in the context of one of the best served public transport hubs in London and providing a location for high quality education and research activity. The new areas of development at Westfield Stratford City will be complemented by the development of a significant new office focused development in and around the International Quarter, with new leisure, education, cultural, visitor focused and business development activity, and delivery of new and regenerated housing areas. The developing character and form of the area will be driven by its prominence as a Metropolitan Centre with an International focus and excellent transport links.

Opportunities for Change and Development

- 14.5. Much of this sub area, approximately two thirds, has undergone a radical change over the last decade as a the result of the delivery of the Queen Elizabeth Olympic Park parklands, transformed venues and the completion of the initial phases of the Stratford City development on the former Stratford Rail Lands, while a number of other development schemes have been completed along Stratford High Street, resulting in a distinct change in character. The opportunities for further development are those that build on this change, either to enable completion of the major development schemes that have planning permission or the potential for new proposals to emerge for those sites and locations which present a viable and

acceptable development opportunity. These areas of change or potential change are described below.

14.6. **Extended Stratford Town Centre area:** this area is shown at Figure SA3.1. This includes the following floor space which has been built at Westfield Stratford:

- Retail (Use Classes A1-A5) 158,813 sqm
- Office (Use Class B1) 15,000 sqm
- Hotel (Use Class C1) 28,483 sqm
- Community and Health (Use Class D1) 1,407sqm
- Leisure (Use Class D2) 26,715 sqm

14.7. Within Westfield Stratford City, the International Quarter and the town centre area to the north of the International Station box includes the following floorspace with planning permission which remains to be built:

- Office floorspace (Use Class B1): 450,000 sqm
- Residential units (Use Class C3): 1224 residential units (at Cherry Park and Angel Lane, together with supporting open space)
- Hotel (Use Class C1): 25,528 sqm

14.8. A separate scheme for a 42 storey tower to the north of the International Station box has planning permission for 253 residential units, 300 sqm of retail floorspace and 155 bed hotel. Tall buildings are therefore considered appropriate within this location.

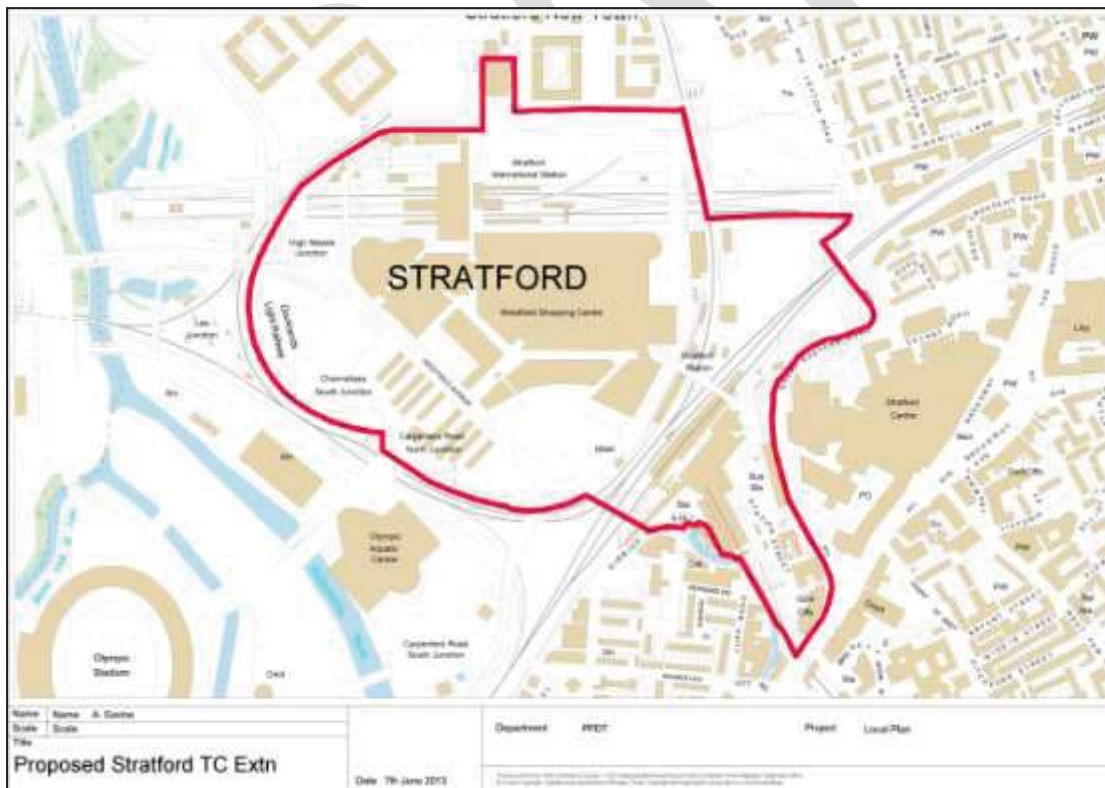


Figure SA3.1 Proposed Extended Stratford Town Centre within Legacy Corporation area

- 14.9. **Chobham Farm South**, a site within the extended Stratford Town Centre area, which does not have a relevant planning permission for future use, provides an opportunity to bring forward a range of uses appropriate to a Metropolitan Centre. However, its relative isolation within a triangle of railway infrastructure would indicate that any use or uses would need to be relatively self-sufficient and not need to rely on passing footfall, presenting an opportunity for a use mix that could include leisure, education or residential. Passive provision has been made for a connection to the Town Centre Link Bridge. The potential need for capacity enhancements at Stratford Regional Station will need to be taken into account when defining the final form of new development within this site. Building heights need to reflect the site's positioning in relation to existing buildings.
- 14.10. **Stratford Waterfront East**, encompasses the area of land between the Waterworks River and Carpenters Road, with the Aquatics Centre providing a prominent focus for this location with the two potential development areas to its north and south. Both have planning permission for development as part of the Legacy Communities Scheme Planning Permission. This permits the development of floorspace set out in Table SA3.1 below, with the residential floorspace equating to approximately 1700 homes:

Table SA3.1: Permitted Floorspace in Stratford Waterfront East

Development Type	Permitted Floorspace (sq.m)
Residential (Use Class C3)	134,000
Retail (Use Classes A1-A5)	9,900 ⁷
Hotel (Use Class C1)	14,500
Leisure (Use Class D2)	1,650
Community Facilities (Use Class D1)	1,430

Location	Permitted Density Range	Permitted Height
North of Aquatics	1000-1250 hrha	33-45 mAOD (with elements up to 96mAOD)
South of Aquatics	850-1000 hrha	36-40 mAOD (with elements up to 43 mAOD)

- 14.11. The high level of public transport accessibility make this a suitable location for higher density development, however, the height and form of development also need to take the waterside setting to the west into account. In order to avoid 'canyonisation' of this section of Carpenters Road with The International Quarter raised above this ground level creating an opposing embankment beyond the road and railway line corridor, building heights stepping down both from Stratford City and between the north-western and the south-eastern proportion of the site, respecting Potential Protected Views within this Plan. In configuring the final form of development in this location, there is potential for the introduction of business, cultural, education and visitor related use.
- 14.12. **Stratford Waterfront West**, includes the land to the south of the Arcelor Mittal Orbit and between the Water Works River on the East and the City Mill River to the

⁷ It should be noted that the LCS Planning Permission (ref: 11/90621/OUTODA specifically caps the total amount of floorspace within Use Classes A1-A5 to no more than the figure stated. Reference should be made to the relevant planning application decision notice and S106 Legal Agreement for specific interpretation of the development permitted within the Legacy Communities Scheme.

east. The Legacy Communities Scheme planning permission permits the range of uses set out in Table SA3.2, with the residential floorspace equating to approximately 1000 homes:

Table SA3.2: Permitted Floorspace in Stratford Waterfront West

Development Type	Permitted Floorspace (sq.m)
Residential (Use Class C3)	75,000
Retail (Use Classes A1-A5)	1,438
Leisure (Use Class D2)	165
Community Facilities (Use Class D1)	440

Location	Permitted Density Range	Permitted Height
Stratford Waterfront West	450 -1000 hrha	24-40 mAOD (with some elements up to 43 mAOD)

- 14.13. In configuring the final form of development in this location, there is potential for the introduction of an institutional use that requires access to the transport accessibility and town centre facilities of Central Stratford. The final form, scale and layout of development within this location will need to take into account the waterside settings to the east and west along with the open space character of the Queen Elizabeth Olympic Park immediately to the north of the AcelorMittal Orbit and the South Park Hub facility and the interface with the retained Olympic Stadium and its permitted uses and access arrangements.
- 14.14. **Stadium Island.** The stadium, transformed from its 2012 Games mode, will provide a focus for pitch sports, principally football and athletics, together with entertainment and cultural events. The adjoining community athletics track and facilities makes provision for community-focused sports use. The transformed Olympic Stadium and related accommodation provides a diverse range of facilities which will contribute to the business, employment and leisure offer, including community use, within this location. The open areas around the stadium and the waterway setting reinforces the contribution that the Stadium Island makes to the wider Queen Elizabeth Olympic Park for open space and habitat. An opportunity also exists to introduce ancillary or other uses that are compatible with and support the primary uses within the transformed Stadium , including education use, subject to the requirements of other policies in this Plan, in particular those for open space and Metropolitan Open Land.
- 14.15. **Greater Carpenters District.** This encompasses the area to the west of Stratford Regional Station, north of Stratford High Street and east of the Waterworks River. It includes a range of business premises and residential development, with the Carpenters residential estate at its core, which incorporates open space, play space and a community hall. It also hosts a range of education uses, including the Building Crafts College, the University of East London's Duncan House facility and Carpenters Primary School. The western end of this district and the Stratford High Street frontage also hosts a substantial amount of new relatively high density residential development.
- 14.16. The core Carpenters Estate area provides the most significant opportunity for change and regeneration. A range of options are possible here including comprehensive redevelopment. However, no specific options have been developed

at this stage. A flexible approach is therefore required within this Plan to allow the development of appropriate options. The main requirement for facilitating any option in this location is the need to improve local connections along existing routes to the north and south and to provide upgraded access to Stratford Town Centre and direct access to Stratford Regional Station from the West.

- 14.17. In order that the local character is enhanced and developed, options would need to ensure that the overall use mix within the Carpenters District remained as diverse as it is currently with a mixture of business, residential and education use. Retention or re-provision of existing residential units with future development options would need to ensure that there was no net loss of housing to ensure that local housing supply was not reduced.
- 14.18. Height and density of any proposed development would need to take account of the relatively high levels of access to public transport, that would increase in the event that a western entrance to the station is achieved but would need to be tempered by the out of centre location and the need to achieve an acceptable level of residential amenity.
- 14.19. Community assets, including the existing open space and school would need to be retained or re-provided to equivalent or greater size and capacity to ensure that this location is at least as well served in future as it is now and take account of any proposed increase in development densities in this provision. Policy SA3.5 sets out the planning requirements for new development within the Greater Carpenters area.
- 14.20. **Bridgewater Road.** This area of land between the Greenway and the Waterworks River is in use for Crossrail construction purposes until 2018. It also forms part of the Legacy Communities Scheme and has outline planning permission which equates to approximately 300 homes. This permits a maximum development height varying between 18 and 21 metres A.O.D. and a density of between 450 and 650 habitable rooms per hectare. Given the relatively low accessibility of the site, this provides a good indication of acceptable density in this location, which should also be reflected in building heights. An area of 1.1 hectares in the northern part of the site has planning permission for new allotments that will be delivered once the land becomes available. This provision is required as part of the overall allotment mitigation package required by the 2007 Olympic Phase planning permission. The site will have walking and cycling access across the Greenway to the Pudding Mill Local Centre and DLR Station. Road access is from Warton Road over the Bridgewater Road road bridge. This bridge requires replacement before permanent development can be occupied in this location. Passive provision for utilities in the new bridge, including provision for extension of the District Heat Network, will be important.
- 14.21. **Rick Roberts Way.** The development opportunity at Rick Roberts Way consists of two sites. The first is the land used as a Transport Mall during the 2012 Games. This has planning permission, as part of the Legacy Communities Scheme, for a new secondary school, with approximately 400 residential units on that part of the land fronting Stratford High Street, where building heights have the potential to be greater. A planning obligation within the S106 Legal Agreement allows for the possibility that this secondary school could be developed elsewhere within the Queen Elizabeth Olympic Park. Were the school not to be developed in this location, alternative uses would include a mixture of residential and employment floorspace along with an adequate provision of local open space to serve this new community. The second site is immediately to the south and is occupied by

decommissioned gasholders and as a result available for development but would require an appropriate level of remediation to ensure that any contamination was suitably cleaned up and the site safe for its end use. A comprehensive approach to the development of the two sites would present the opportunity to ensure that the development addressed the location as a whole.

The Infrastructure Needed to Support Growth

- 14.22. Within this sub area, the development opportunities and currently planned development are directly served by an existing range of infrastructure which includes/the following additional infrastructure has been identified as necessary:
- 14.23. **Community Facilities** – With good access to Stratford Town Centre and the ability to use the facilities in the existing Carpenters Primary School and in the future at the Rick Roberts Way School, additional community facility provision is not considered necessary within the sub area.
- 14.24. **Schools** – A Secondary School or all age school at Rick Roberts Way to meet the projected school place need for the Legacy Corporation Area. Retention or reprovision of the Carpenters Primary School in order to maintain current levels of primary school place provision.
- 14.25. **Town and local centre services** A range of local retail floorspace has been constructed as part of a number of the recently built development schemes along Stratford High Street. Good access is also available to the wide range of goods and services available in the extended Stratford Town Centre.
- 14.26. **Heat network.** Development of physical connections across infrastructure barriers would allow the current heat network serving the Queen Elizabeth Olympic Park and Stratford City areas and some adjacent development schemes to be extended to new and existing development areas within this sub area.
- 14.27. **Highways Network.** The extent of the highway network within the sub area is essentially fixed and does not provide the opportunity to physically increase capacity, beyond the provision of new tertiary streets where larger scale comprehensive development is brought forward. However, although just outside of the Legacy Corporation area, the long-term aspiration to reconfigure the Stratford Gyratory system from one way to two way traffic flow would significantly improve the street environment along the Great Eastern Road and improve local connectivity between Stratford Town Centre and the Proposed Town Centre extension. Any consequent opportunities to improve the street environment and traffic management along Stratford High Street, improving conditions for walking and cycling, would also be encouraged in conjunction with this.
- 14.28. **Public Transport.** Access to significant levels of public transport service are available within a relatively short distance at Stratford Regional Station, Stratford International Station and Stratford and Westfield bus stations, with the sub area locality well served by bus routes along Stratford High Street and the Great Eastern Road and the Stratford High Street DLR station. A new western entrance to Stratford Regional Station is identified as a project within the Legacy Corporation Infrastructure Delivery Plan as being necessary to improve direct access from the Greater Carpenters district and the wider surrounding area.

- 14.29. **Parkland, open space and water environment.** With the Queen Elizabeth Olympic Park South Plaza area falling within this sub area with its gardens and event spaces, along with the open spaces associated with the stadium and the waterways that run through the area, the River Lea, Waterworks River and City Mill River, the north part of Sub Area 3 provides a significant open space resource for the wider area. While the remainder of the area has a greater urban intensity, the Stratford City area includes proposed open spaces at Cherry Park and the International Quarter, while the Carpenters Estate includes a central open space and hard court games area. The Carpenters Primary School is identified as an area of protected open space, while the future delivery of a school at Rick Roberts Way would include playing field and outdoor areas, which in both cases have the ability to meet some local need.

Policies for the Sub-Area

Policy SA3.1: A Metropolitan Centre

Proposals for development within the Sub Area 3 Stratford Town Centre Extension area as defined in Stratford Town Centre Extension site allocation below, should contribute to the Metropolitan Centre function of the centre and comply with the character and mix of uses defined within the Site Allocation for Stratford Town Centre Extension and Policies BEE.1 and BEE.7 in this Plan.

Policy SA3.2: Cultural and Education facilities

The Legacy Development Corporation will work with its partners to promote and support the provision of new cultural and education facilities within the areas of Stratford Waterfront (East and West) and Stadium Island. Specific proposals will need to demonstrate that they conform to the vision for this Sub Area and are in accordance with the other policies within this plan

Policy SA3.3: Interim Leisure, Cultural and Event Uses

Within the International Quarter and Stratford Waterfront (East and West), interim uses that compliment and reinforce the leisure, cultural, open space and event based uses in this part of the Queen Elizabeth Olympic Park, will be encouraged and supported, provided that:

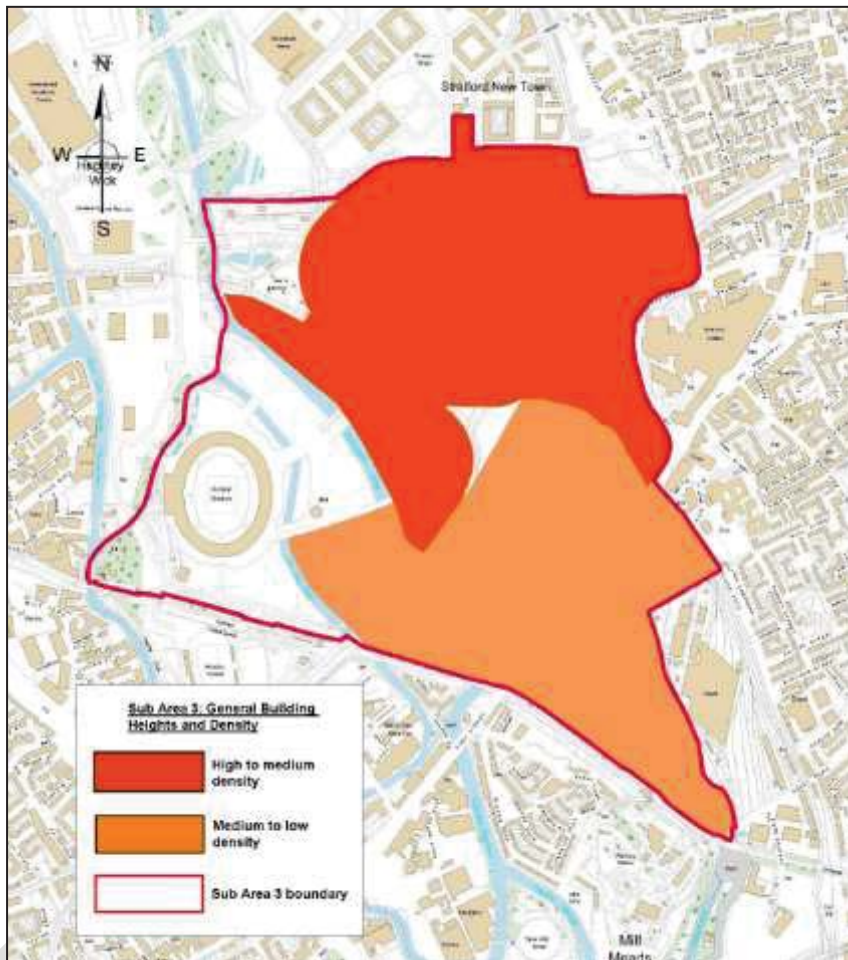
- The uses are complimentary to and reinforce the long-term uses and character identified for these locations within this Plan; and
- It can be demonstrated that there will not be a negative effect on the amenity or function of existing permanent residential and commercial uses in the vicinity of the temporary use.

Policy SA3.4: General Building Heights and development density

Building heights should be suitable for the location in which it is proposed. Tall buildings should be confined to the expanded Stratford Town Centre shown in Figure SA3.1 and along Stratford High Street, with building height decreasing with distance from the Town Centre area. New development along Stratford High Street should generally be no greater than eight storeys in height, except where within existing commitments. As shown in Figure SA3.2 high to medium densities are considered

appropriate at the extended Stratford Town Centre area and adjacent, moving to medium to low density within other areas beyond.

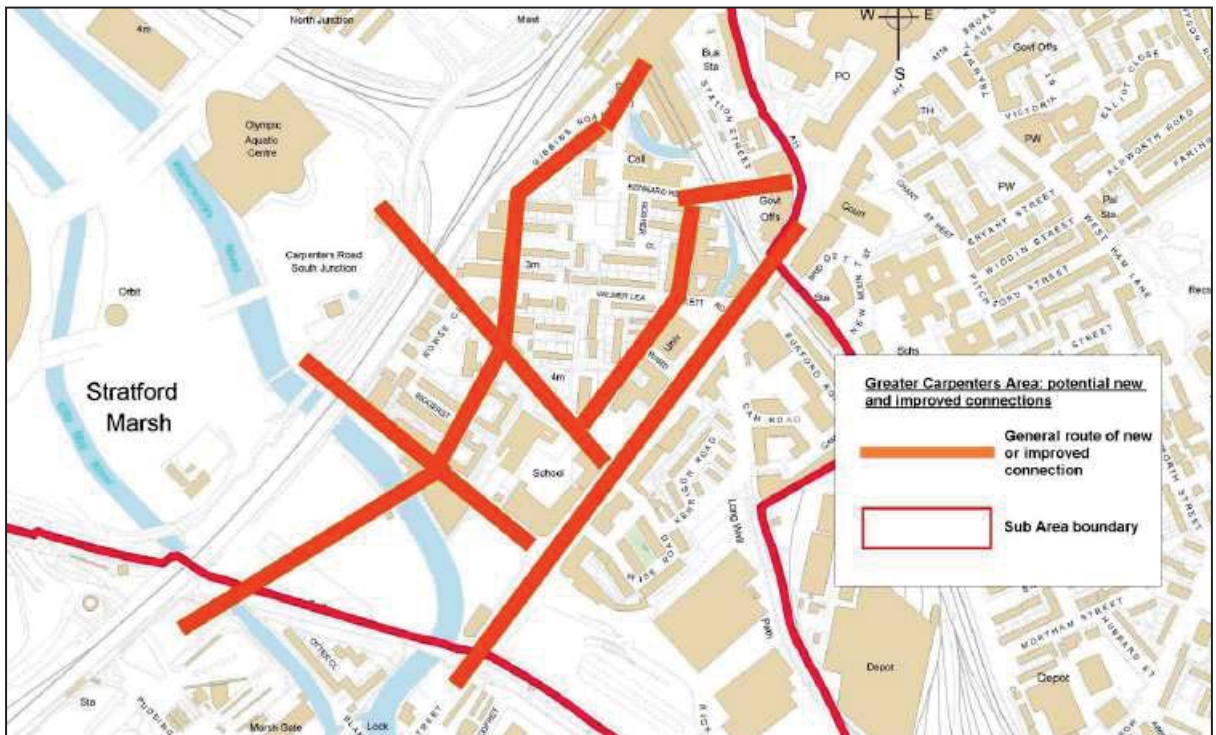
Figure SA3.2: General buildings heights and density



Policy SA3.2: Improving connections

The Legacy Corporation in its role as Local Planning Authority will work with its partners to promote improved connectivity between and through the Greater Carpenters area to the north and to Stratford Town Centre. Proposals for development should demonstrate that they allow space for and are configured to facilitate the delivery of new and improved connections as indicated in Figure SA3.3, including a new walking and cycling route parallel to Stratford High Street.

Figure SA3.3: Potential new or improved connections



Policy SA3.6: Community Facilities

Loss of existing community facilities within the sub area, including schools, will only be permitted where that community facility is replaced by one of an equivalent size and capacity or it can be demonstrated that one of a lower size or capacity is sufficient to meet the relevant need being met or that there is no-longer a need for that facility.

Policy SA3.7 Development within the Greater Carpenters District

Within the Greater Carpenters Area as defined in the Greater Carpenters Site Allocation below, the Legacy Corporation will promote the provision of improved connectivity to the north and to Stratford Town Centre and explore options for the delivery of a Western Entrance to Stratford Regional Station.

Development proposals within the Greater Carpenters District should:

- ensure that community assets are retained or re-provided at an equivalent size, capacity and function.
- ensure that there is no net loss of housing provision across the district.
- provide an acceptable level of residential amenity for new and existing homes.

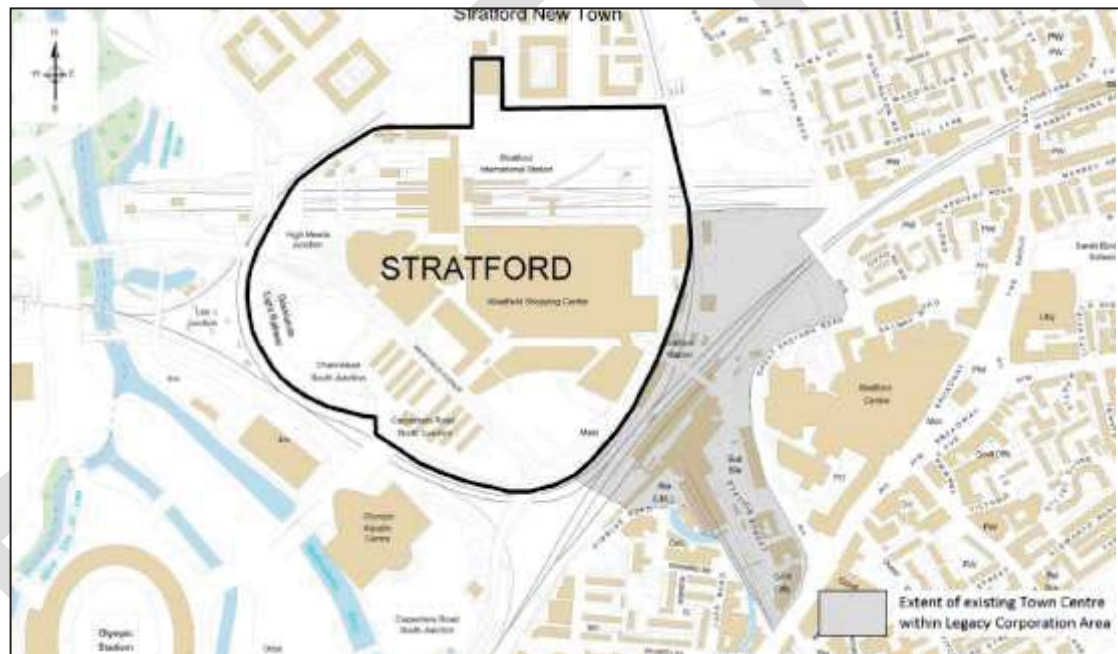
14.30. Where additional or replacement development is proposed, this should ensure that the existing mix and balance of residential, business, education and community facility use is retained within the area as a whole. Where proposals for significant or comprehensive development or redevelopment are brought forward, any application for planning permission will be required to demonstrate, through the submission of a statement of participation, that a significant process of community engagement

and stakeholder consultation has been undertaken during the pre-application period of scheme development.

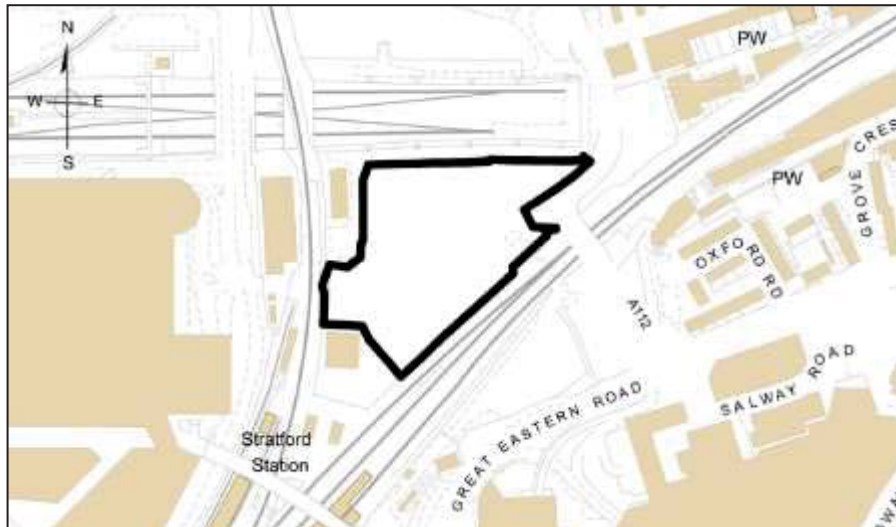
Site Allocations

- 14.31. **Stratford Town Centre Extension:** An extension of the existing Stratford Town Centre to encompass the Stratford City Westfield and International Quarter encompassing a full range of town centre uses appropriate in scale and form to a Metropolitan Centre. The site allocation area presents the following capacity in addition to that constructed.

Use	Floorspace or Residential units
Retail	3000 sqm
Office	450,000 sqm
Leisure	2000 sqm
Residential	1810 units
Hotel	25,500 sqm

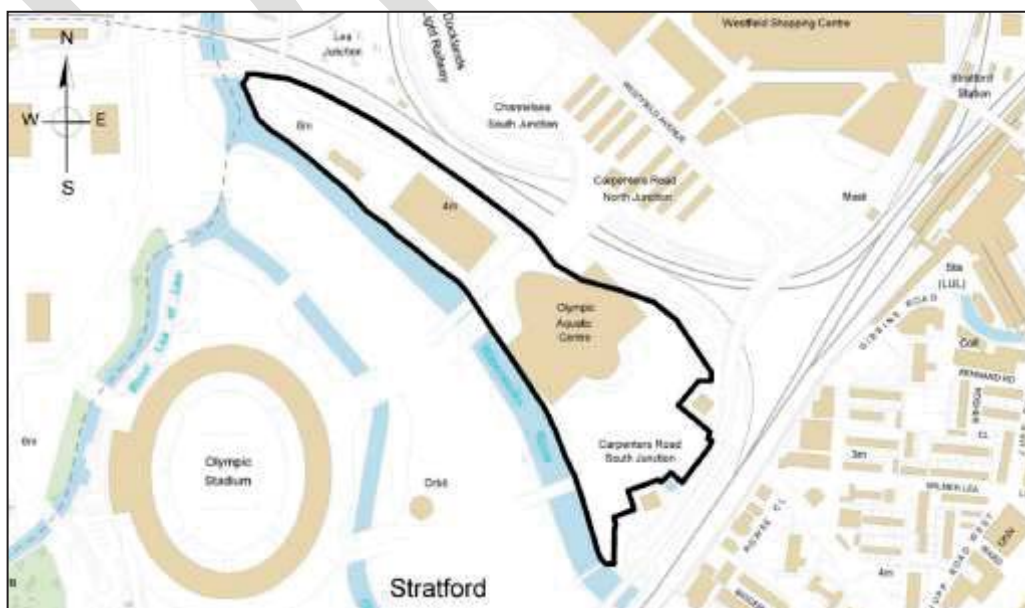


- 14.32. **Chobham Farm South:** An area suitable for a single use or a mix of uses encompassing leisure, office, education or residential in a form that reflects its central Stratford Location and constrained access, including provision of a completed access to Stratford Town Centre via the existing Town Centre Link Bridge, while making allowance for future capacity enhancements at Stratford Regional Station.

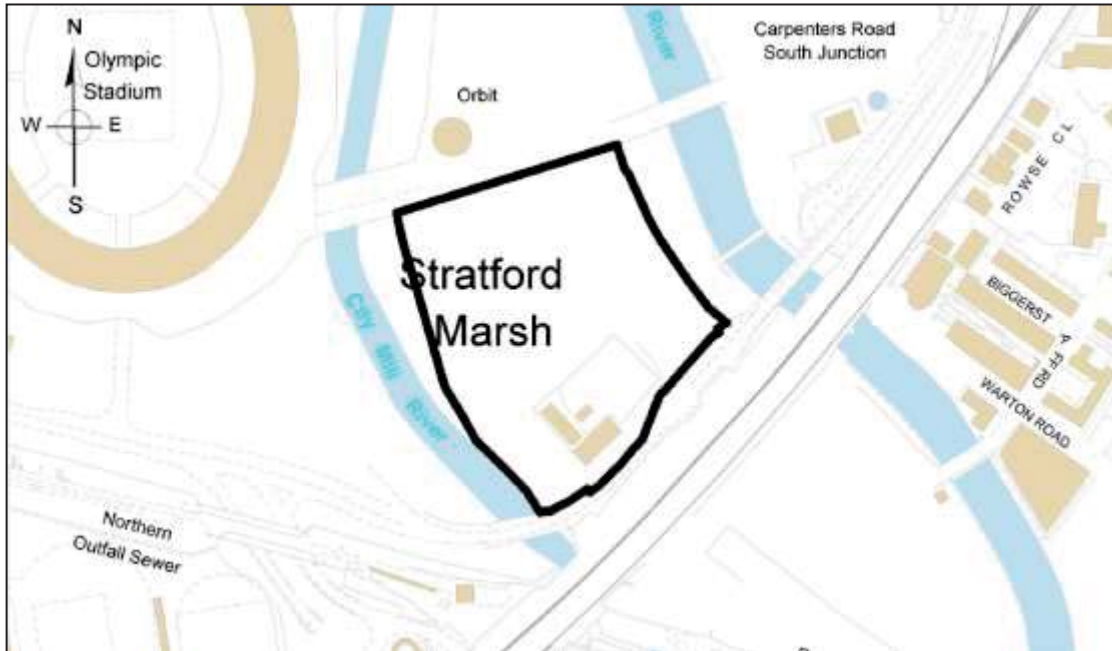


- 14.33. **Stratford Waterfront East (PDZ1)** An area of high density development to the North and south of the Aquatic Centre, in a form that steps down from the heights and density at Stratford City, that includes a mix and amount of uses in accordance with the following use mix, while allowing flexibility in that final form for the introduction of significant cultural, conference centre, institutional or education use.

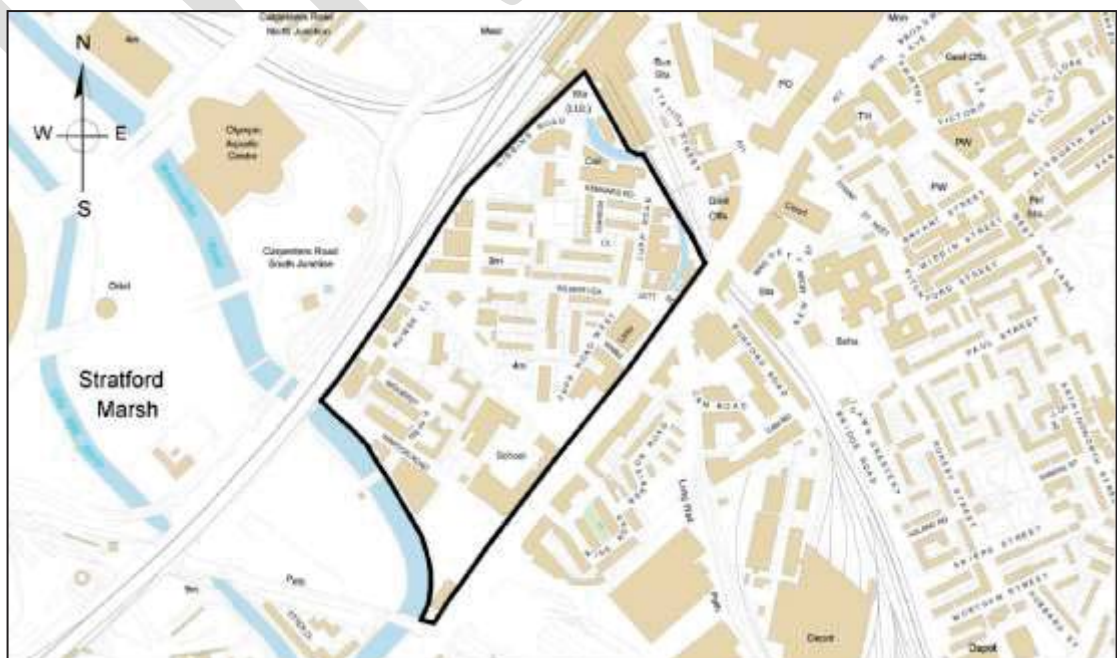
Use	Floorspace (sq.m) or Residential units
Retail	9,900
Office and other business floorspace	3,600
Leisure	1,650
Residential	1,705



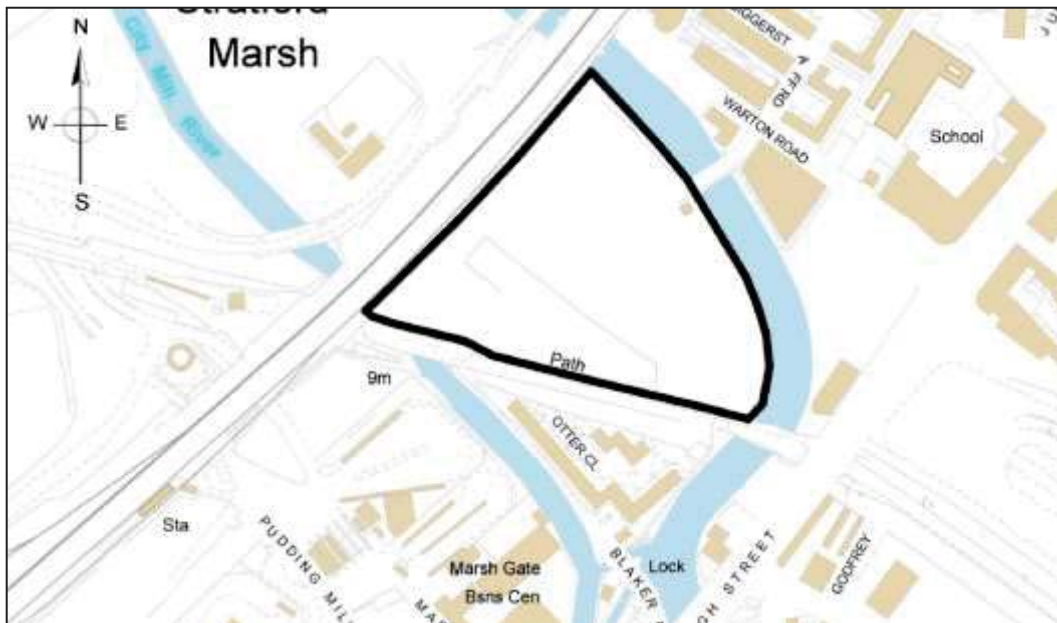
- 14.34. **Stratford Waterfront West:** An Area of medium density residential development, of up to 1,000 homes, to the south of the ArcelorMittal Orbit including a range of subsidiary community, retail and leisure uses with a flexibility in final form and use mix that would also allow introduction of a significant conference centre, institutional or education use.



- 14.35. **Greater Carpenters District** An area of existing mixed, predominantly residential, use ranging from high to medium density with a significant proportion of family housing, with the potential for comprehensive development or significant regeneration and renewal which reflects the overall existing residential, business and education mix of the area, along with a new western entrance to Stratford Regional Station and improvement to existing connections to the north and to Stratford Town Centre as well as south-west to the Greenway via Bridgewater Road.

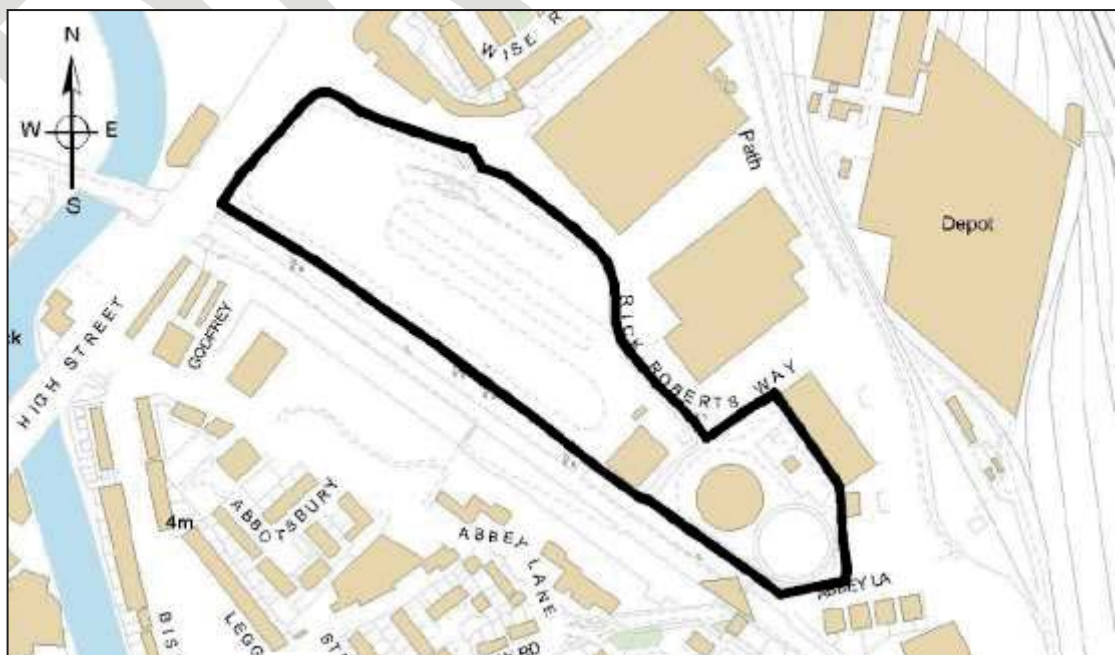


- 14.36. **Bridgewater Road** An area of new medium density residential development of up to 300 units and an area of at least 1.1 ha of allotments, with improved riverside environment and access to and across the Greenway and a rebuilt Bridgewater Road Bridge.



- 14.37. **Rick Roberts Way** A new secondary school or all age school, with playing fields and pitches, in conjunction with medium density residential development of up to 550 units.

- 14.38. Where it is possible to adequately demonstrate that school provision has or will be made in an alternative location within this sub-area or within the Queen Elizabeth Olympic Park, an alternative use mix providing a comprehensive development would include: medium density residential development, business space and an area of open space adequate to serve local community needs.

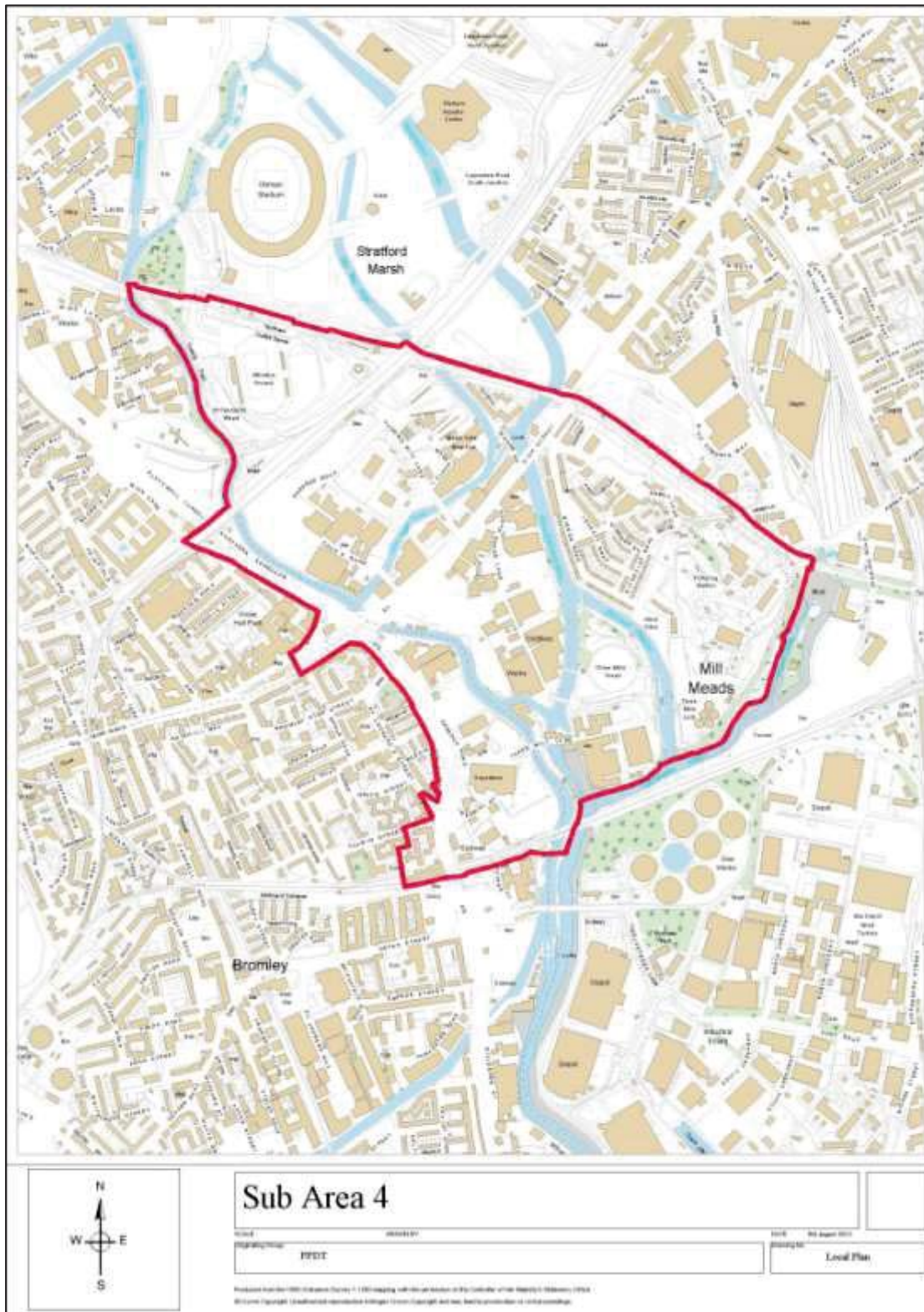


References and evidence base

- Stratford Metropolitan Masterplan, London Borough of Newham,, 2011
- London Borough of Newham Core Strategy, 2012
- London Borough of Newham Retail Capacity Study, 2010
- Stratford City Outline Planning Application 07/90023/VARODA and associated planning applications and detailed approvals
- Legacy Communities Scheme Outline Planning Application 11/90621/OUTODA and associated detailed approvals

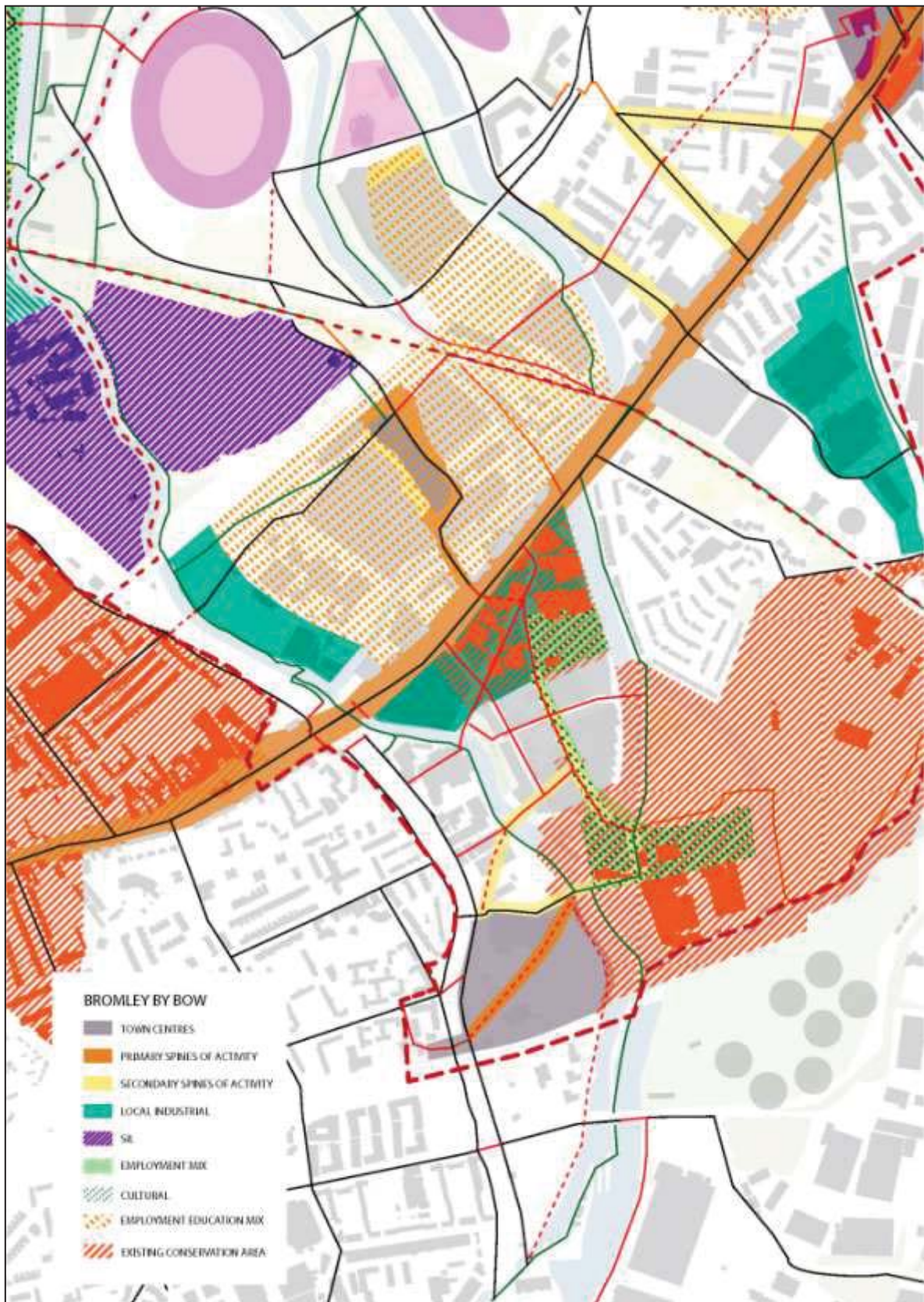
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15. Sub Area 4 – Pudding Mill, Bromley-by-Bow and Mill Meads



- 15.1. Sub Area 4 extends to the south-west of the Legacy Corporation area and is located between the existing residential communities to the west in Bow and the Queen Elizabeth Olympic Park and Stratford to the East. The A12 Blackwall Tunnel North Approach marks the western edge of the area, and acts as a significant barrier to integrating the development areas to the east with the existing residential communities to the west. The A11 slices east west through the area and creates a similar barrier to movement. The Three Mills Wall River, Prescott Channel and River Lea provide visual amenity and environmental quality and further challenges to east west connectivity. The London to Southend mainline and London Underground District and Hammersmith and City Lines mark the areas southern boundary. The area's geographical relationship to the waterway, railway and road infrastructure has influenced the use of adjacent land with industrial and commercial activity dominating.
- 15.2. The sub area is now occupied by a combination of vacant land and buildings, existing businesses and recently constructed commercial and residential development. . The decline in industry and manufacturing, and the area's strategic location and proximity to the City, Canary Wharf and Stratford and the Queen Elizabeth Olympic Park, has contributed to the area emerging as an area of potential significant land use change with the opportunity for new development to provide a mix and arrangement of uses that support existing and future residential communities, create a range of jobs, improve access into and through the Lea Valley and celebrate the area's unique waterside and historic setting.
- 15.3. A significant part of the sub area benefits from extant planning permissions with vacant land awaiting redevelopment. The area has the potential to accommodate a new District Centre at Bromley-by-Bow, focused on an existing foodstore, and a Local Centre at Pudding Mill. These destinations would enable existing and new residents to access local goods and services and serve wider catchments if new and improved infrastructure addresses the severance created by the existing roads, railways and waterways. The potential for new development to benefit from the area's strategic location and waterside and heritage setting and resolve its detachment is established by other planning policy documents prepared by the Mayor of London, LTGDC and the Boroughs. The Legacy Corporation will continue to promote change in the form envisaged by those policy documents.

Figure 15.1- Relationship with surroundings



- 15.4. The sub area is located south of the Queen Elizabeth Olympic Park, west of Stratford and east of the A12 and existing residential communities to the west. Stratford High Street and the A12, along with Bromley-by-Bow Station and Pudding Mill DLR station provide good road and rail connections from this area to the wider sub region, including Central London and Canary Wharf. The Greenway, a section of the Northern Outfall Sewer which runs within an embankment along the eastern side of this sub area provides a green corridor and public right of way for pedestrians and cyclists from Fish Island to Beckton.

Vision for the Sub area

An area of new communities at Pudding Mill, Bromley-by-Bow and Sugar House Lane, that successfully integrate a genuine mix of new housing , creative industry , business, retail and community uses, set along and around a series of waterways and open spaces that benefit from and contribute to the setting and the function of the Queen Elizabeth Olympic Park.

The character and form of these new places will be influenced by and respect the extensive riverside frontage to the River Lea, Bow Back Rivers and Three Mills Wall River; the leisure opportunities created by Three Mills Green and the Lea River Park; and the industrial heritage of the Three Mills and Sugar House Lane Conservation Areas. The area will be well integrated, with new connections across the A12, Stratford High Street and the waterways, while a new District Centre at Bromley-by-Bow and a new Local Centre at Pudding Mill will provide a focal point for retail and local services along with easy access to tube services at Bromley-by-Bow Station and DLR at Pudding Mill. A new Primary school and open space at Bromley-by-Bow will reinforce the role of the new centre and provide a hub of community activity while meeting local need for open space and primary education.

Opportunities for Change and Development

- 15.5. **Pudding Mill:** land that stretches from the River Lea in the west to the Greenway in the east that is bounded by the Great Eastern Railway embankment to the north and the Bow Back Rivers to the south. It comprises a range of existing business premises and vacant land that were previously occupied by temporary uses during the 2012 Games. The area also accommodates the eastern Crossrail portal and the existing and relocated Pudding Mill DLR Station.
- 15.6. Part of the area has planning permission as part of the Legacy Communities Scheme, including approximately 1000 new homes, 2,345sqm of retail floorspace, 36,000sqm of employment floorspace, with less significant amounts of leisure and community facility floorspace. There is the potential for a new Local Centre to be focused around the new DLR station at Pudding Mill Lane. The remainder of the Pudding Mill area provides the opportunity for a similar overall mix of uses, including residential development alongside a significant level of employment generating floorspace. The balance of employment floorspace will need to be greater in the area to the west adjacent to the River Lea and the A12 to provide an environmental and visual buffer that will allow a higher quality of residential development within the rest of the site.
- 15.7. The area should continue to provide a range of employment floorspace that includes premises suitable for small and medium sized businesses, including

managed and supported workspace, such as that which already exists within the Marshgate Business Centre. Where land is currently vacant or underutilised, there is also the potential for temporary uses to occupy land and meet the demands for shorter term business space and other commercial activity that will prove compatible with the emerging new permanent uses permitted or envisaged for the area.

- 15.8. **Sugar House Lane:** a 10 hectare peninsular of land bounded by Stratford High Street to the north the River Lea Navigation to the west and Three Mills Wall River to the east. The site accommodates a mix of commercial activity, including a number of creative industries, and vacant land and buildings. The existing designation of the Sugar House Lane Conservation Area acknowledges the areas historic industrial legacy and protects the character and appearance of the most significant former industrial buildings and network of yards and spaces. The area should adopt a genuinely mixed use character that retains a strong employment focus that includes a base for creative industries and introduces a new residential community served by a range of local amenities and high quality public transport, pedestrian and cycle connections. The area will be defined by its unique natural environment and historic industrial legacy that includes extensive canal and river frontage, robust yet adaptable buildings and intricate yards and passages. The historic character of the area will be celebrated by weaving high quality new buildings into the historic fabric.
- 15.9. The entire site benefits from part full and part outline planning permission for a significant mixed use development, which includes:
- 1,200 residential units
 - 12,500 sqm of flexible non-residential floorspace
 - 34,000 sqm of offices and workshops
 - 350 bedroom hotel
 - pedestrian river bridge
 - riverside park
- 15.10. **Bromley-by Bow:** an 8 hectare area of land bounded by the A12 to the west, the C2C Fenchurch Street to Southend mainline and London Underground Hammersmith & City and District lines to the south, the River Lea Navigation to the east and the Bow interchange grade separated junction to the north. Bromley by Bow Station is located at the south west corner of the area. The area currently accommodates a foodstore and associated car parking, industrial and distribution activities and vacant land and buildings. The entire site benefits from hybrid planning permissions.
- 15.11. Bromley-by-Bow is identified in the London Plan as a potential new District Centre, The Bromley-by-Bow Masterplan and the existing planning permission incorporate a new Primary School, open space and an Ideas Store into the proposed new centre. Proposals within the area also include improvements to Bromley-by-Bow Station and to the underpass that links this to this land on the eastern side of the A12. To maximise the opportunities to deliver a successful new centre and community in this location, improved linkages across the A12 and links to the east across the River Lea are essential to improve local and wider connectivity and integration of new and existing communities across and beyond this Sub Area. Development in this area should be brought forward in a comprehensive manner.
- 15.12. **Three Mills Island:** a three hectare area of land surrounded by Three Mills Wall River to the west, Prescott Channel to the north and east and the River Lea and

Channelsea River to the south. The island falls within the Three Mills Conservation Area which includes a special group of Statutorily Listed former mill buildings, including the Grade I House Mill, the Grade II listed Clock Mill and Custom House and part of the Three Mills Lane itself, as well as other buildings of townscape merit. The island accommodates the Three Mills film studios, a recently constructed residential development and Three Mills Green, a significant area of public open space, which incorporates designated play areas. The area provides the opportunity to build on the existing heritage assets and establish a range of uses that building on the existing cultural and community assets and the business space within the existing buildings and those that help to support and develop the film studio uses. This location provides the opportunity to provide a focal point for visitors and at the same time be an area of transition that can complement the proposed district centre at Bromley-by-Bow. New development will need to protect the architectural and historic interest of the listed buildings, and preserve and enhance the conservation area.

- 15.13. **Mill Meads:** this land is bordered by the Three Mills Wall River and Prescott Channel to the west, Channelsea River and Abbey Creek to the south and the Greenway to the east. The area accommodates the established residential area served by Abbey Lane and Bisson Road and the Thames Water Abbey Mills Pumping Station complex, which includes the historic grade II listed Abbey Mills Pumping Station along with other listed buildings and structures, and its modern replacement, along with areas of open land, including allotment gardens. The pumping station complex is located within the Three Mills Conservation Area. The land is predominantly operational land for Thames Water but also designated open space and Metropolitan Open Land which it is intended will form a future phase of the Lea River Park. This area is also within the Three Mills Conservation Area. The listed buildings and structures associated with the original Abbey Mills Pumping Station provide an opportunity for sensitive re-use that could help to retain the buildings and other items of historic interest, while maintaining the historic and open space characteristic of the location. New non-residential uses would need to be of a scale and type that would be compatible with a location that is outside a local or district town centre. Such uses would also need to be compatible with the access and operational requirements of Thames Water.
- 15.14. **Bow Goods Yard:** is designated as Strategic Industrial Land and its use as a strategic railhead is protected. While no change to this is envisaged within the lifetime of this Plan, there is potential to consider future options for consolidation of the existing rail use within the site to allow introduction of other appropriate SIL uses that may or may not be directly associated with the rail facilities. Consideration of access arrangement would be important in this respect.
- 15.15. **Stratford High Street:** this is the main route connecting Stratford to Mile End and the City. It incorporates a grade separated junction with the A12 at Bow interchange. The street is characterised by a mix of commercial development, recent high rise residential development and vacant or available sites. Some sites have planning permissions which may not now be implemented. In considering alternatives schemes, the Legacy Corporation will consider proposals against the policies in this plan, in particular HBE6. The scale and relationship to the high street will be particularly important, as well as an appropriate mix of viable and appropriate uses to serve new residential development.

The Infrastructure Needed to Support Growth

- 15.16. The potential for land use change and an intensification of development within the sub area is predicated on the delivery of new physical and social infrastructure, including:
- 15.17. **Community Facilities** – proposals within the sub area that have planning permission make provision for community space, while the identified new primary school at Bromley-by-Bow will also provide opportunity to utilise the premises for community events and meetings. The House Mill at Three Mills Island also provides an existing space and focus for community events and meetings. New community facility floorspace will be required as part of development proposals as set out in policies elsewhere in this plan.
- 15.18. **Schools** – a new primary school is required at Bromley-by-Bow. The relocated Bow secondary school is situated immediately to the south of Bromley-by-Bow. Should demand for school places exceed planned capacity or the ability of existing schools to expand to meet that demand, Pudding Mill would provide an area of search suitably placed to meet the needs of planned new communities and would be accessible to existing communities within more than one borough.
- 15.19. **Town and local centre services:** the potential new District Centre at Bromley-by-Bow and a new Local Centre at Pudding Mill would provide a focus for local retail and business for residents at each end of the sub-area, with Stratford providing the main location for major town centre services, accessible using bus and DLR links.
- 15.20. **Heat network and renewable energy opportunities.** Although there is no existing heat network, potential to utilise the future extension of existing or new networks to supply development within this sub area exist, including the passive provision of ducting within new bridges which should be pursued. Opportunities to deliver local renewable energy generation, particularly where associated with the waterways and tidal mills also exist and are encouraged.
- 15.21. **Highways Network.** Areas and sites with development potential within this sub area are of a size significant enough that each proposal will need to consider how it contributes to provision of the structure of local streets and routes for vehicles, pedestrians and cyclists. These should be developed in accordance with the hierarchy of streets set out in Policy T6.
- 15.22. The improvements to existing and new connections considered necessary for the delivery of the development anticipated within this sub area are:
- new all movements junction on the A12 at Bromley-by-Bow that serves the potential new district centre by improving access for pedestrians, cyclists, buses and general traffic;
 - widening and improving the pedestrian underpass adjacent to Bromley-by-Bow Station to allow access to the new district centre and beyond;
 - new and improved vehicle, pedestrian and cycle bridges across the River Lea;
 - a new all movements junction on the A11 to improve access to and from Sugar House Lane for pedestrians, cyclists, buses and general traffic;

- a potential new bridge across the Bow Back River linking to the all movements junction and connecting with Marshgate Lane;
- delivery of a cycle superhighway route along Stratford High Street;
- delivery of a west-east pedestrian and cycle route, parallel with Stratford High Street, through Pudding Mill, across the Greenway and through the Greater Carpenters area parallel to Stratford town centre;
- pedestrian and cycle improvements at Bow interchange.

15.23. **Public Transport.** Improvements are required at Bromley by Bow Station to improve accessibility, create step free access and improve its design and appearance that better serves the existing and new communities. Improvements to the routing and frequency of existing and future bus routes and their interchange at Bromley by Bow and Pudding Mill Lane stations and their respective proposed district and local centres.

15.24. **Parkland, open space and water environment.** The area has an existing network of green and open space in its southern part, at Three Mills Green, along the Greenway and the future Lea River Park area at Mill Meads (which is designated as open space in the natural environment section of this plan). The waterways are a dominant characteristic in much of the sub area, which along with their towpaths contribute towards the openness of these locations. New open space will be required as part of major developments, in particular as part of a potential new district centre at Bromley by Bow. Improvements to towpaths and increasing access to the waterside will also be required.

Policies for the Sub-Area

Policy SA4.1: A potential District Centre

The Legacy Corporation supports the future designation of a new district centre at Bromley by Bow, in accordance with Table A2.2 of Annex 2 of the London Plan 2011. Proposals for development will be required to demonstrate that they contribute to the comprehensive development of the Bromley-by-Bow site allocation area, including an appropriate mix and balance of uses that together have the potential to function as a district centre, including retail, employment floorspace, community uses, a primary school, open space and improved public realm. New development should also respond positively to the adjacent waterways and listed buildings at Three Mills.

Policy SA4.2: Scale of development

Development within the sub area should generally be of medium density. Taller buildings will only be permitted in exceptional circumstances, either where they are close to the District Centre or relate well to the surrounding form of development and street environment, and will be assessed against policy HBE6 of the local plan.

Policy SA4.3: Improving connections

Proposals for development within Sub Area 4 will be required to demonstrate that they physically contribute towards local connectivity, and where applicable, make allowance for provision of improved connections in those locations identified within this plan. In particular in this sub area improved connections will be sought across the A12, across the Rivers and across Stratford High Street.

Policy SA4.4: Community Facilities

Proposals for new community facilities will be supported where these are within the District Centre or Local Centre or exceptionally in other locations where it can be demonstrated that they are easily accessible to the communities that they are intended to serve.

Policy SA4.5: Heat Networks and Renewable Energy

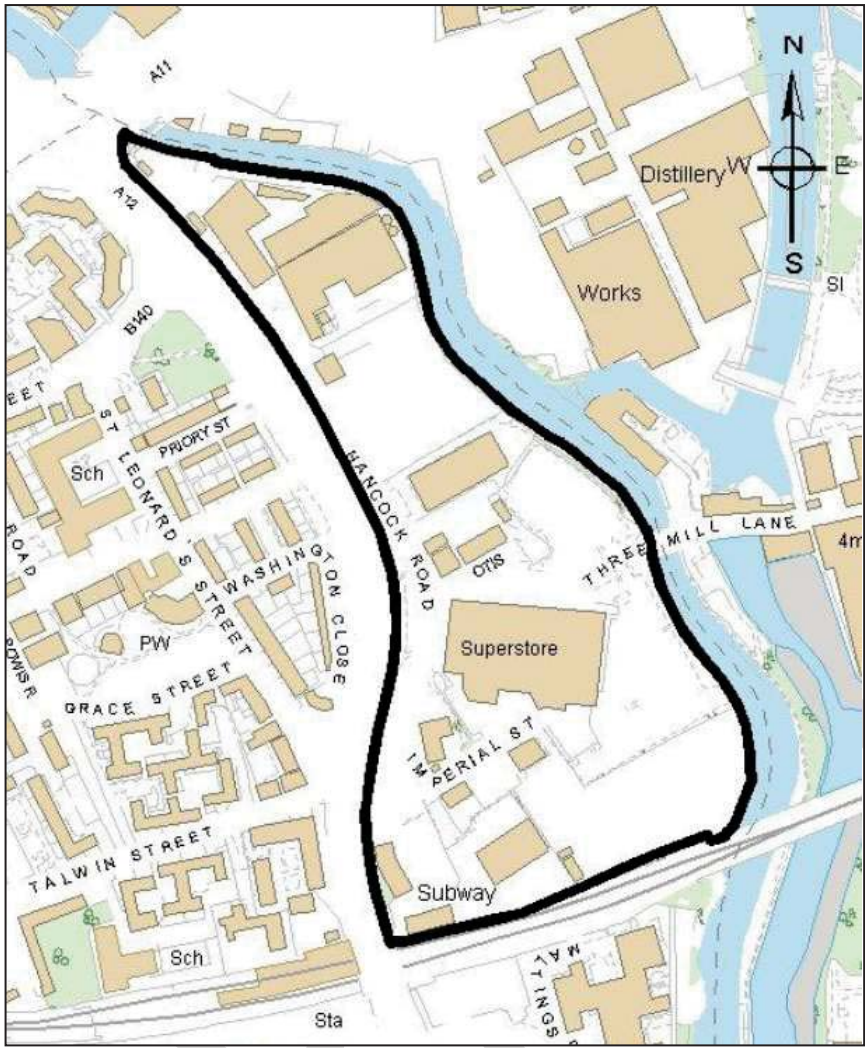
New development and infrastructure, including highways and bridges, within this sub area should make allowance or provision for the future introduction of heat network infrastructure, including taking account of the location of points for potential connections to the network. Proposals for renewable energy generation will, subject to the other policies within this plan, be supported.

Policy SA4.6 Enhancing Three Mills Island

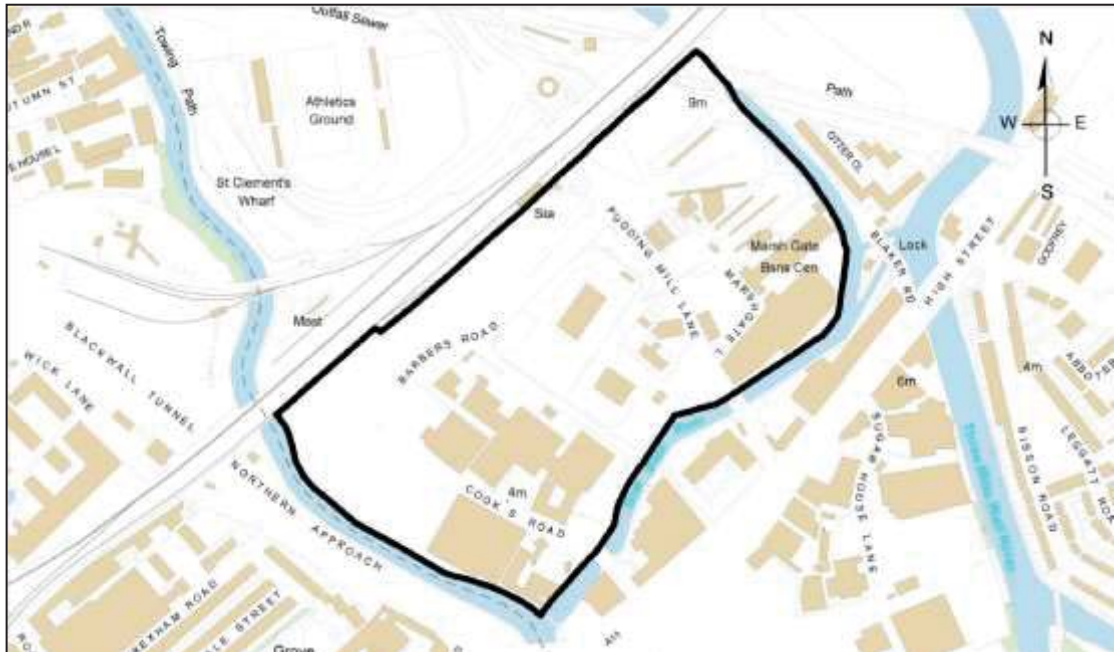
Proposals for new development or new uses within existing buildings within Three Mills Island should demonstrate that they conserve and enhance the character of the conservation area and the setting of the listed buildings, while complimenting the range of existing employment, including cultural and creative employment, and community uses.

Site Allocations

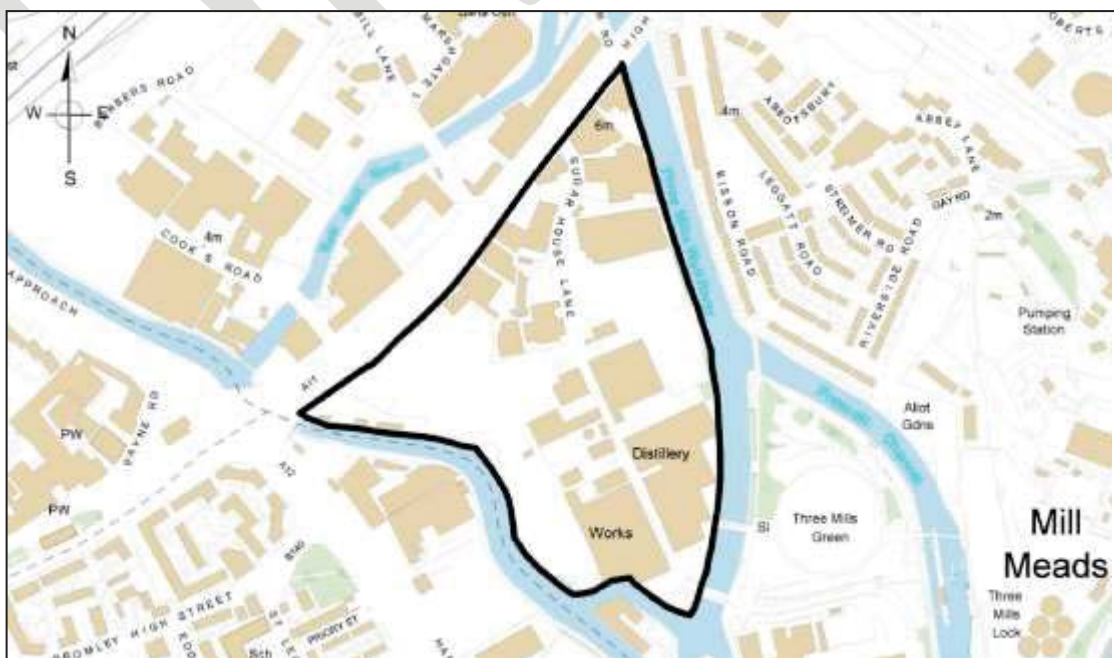
- 15.25. **Bromley-by-Bow:** A new mixed use area consisting of a potential new District Centre, a primary school, local open space and new riverside walkway, library or equivalent community facility, up to 1200 new homes with a significant element of family housing and new employment generating business space in a range of sizes and formats. Development proposals should be capable of comprehensive delivery in order to ensure that the regeneration potential of the area as a whole is achieved. Landowners should work together to bring forward comprehensive or complimentary schemes that are capable of achieving the delivery of the district centre and identified infrastructure for the location as a whole. Accessibility improvements will be required to enable the new centre to be accessible to new and existing communities.



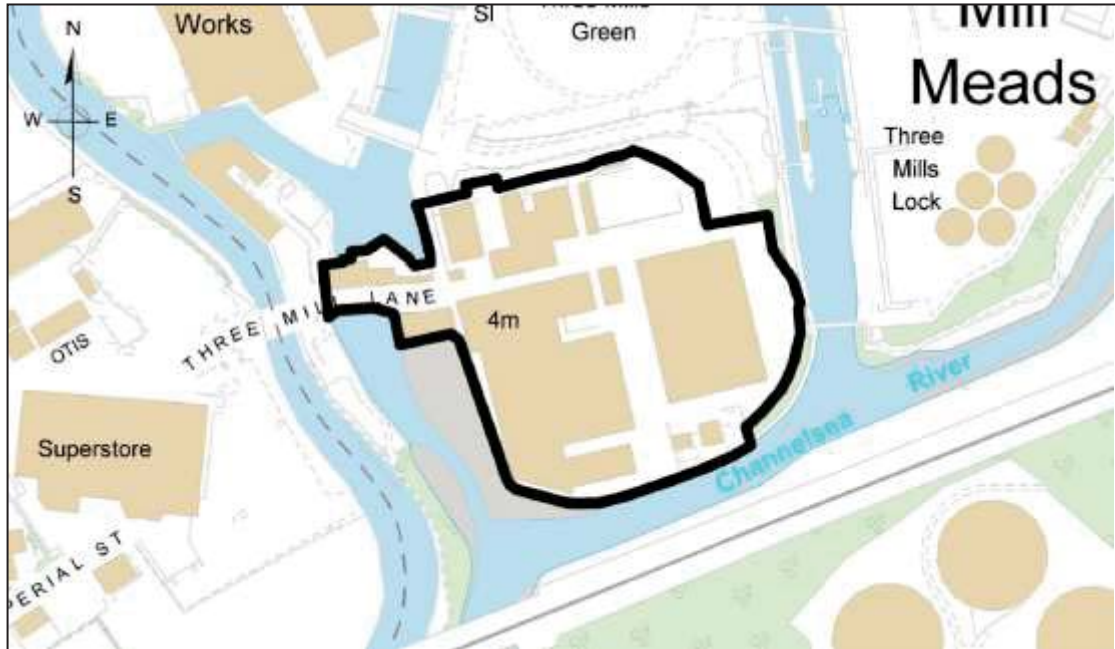
- 15.26. **Pudding Mill:** a new medium density mixed use area, including a significant and diverse element of new and replacement business floorspace including spaces suitable for small and medium sized businesses; a new Local Centre adjacent to Pudding Mill DLR Station and Pudding Mill Lane; 1200-1500 new homes including a significant element of family housing, new local open space and public realm. Across the Pudding Mill allocation site, a minimum of 25% non-residential floorspace should be achieved, with a predominantly industrial floorspace mix in the area to the west of Cooks Road and around the Crossrail portal.



- 15.27. **Sugar House Lane:** a new medium density mixed use area including, business (cultural and creative) and local retail space focused in the northern part of the site, up to 1200 new homes with a significant number of family homes, local open space and public realm. A new all movements junction to enable access to the area, and new bridges to link the area to surrounding communities.



- 15.28. **Three Mills:** retention and development of cultural and creative industries and community uses within and around the cluster of listed buildings in a form that retains and improves the character and setting of the listed buildings and conservation area, in particular respecting the importance of the tidal mills and related buildings.



References and evidence base

- Bromley-by-Bow Masterplan, London Borough of Tower Hamlets, 2012
- London Borough of Tower Hamlets Core Strategy, 2010
- London Plan, 2011
- Mayor's Olympic :Legacy Supplementary Planning Guidance, 2012
- Stratford Metropolitan Masterplan, London Borough of Newham, February 2011
- London Borough of Newham, Core Strategy, 2012
- A12 Study: London Thames Gateway Development Corporation, 2010
- Legacy Corporation Infrastructure Delivery Plan Study, URS, 2012
- Three Mills Conservation Area, Character Appraisal and Management Proposals, London Borough of Newham, 2006
- Sugar House Lane Conservation Area, Character Appraisal and Management Proposals, London Borough of Newham, 2010
- Legacy Communities Scheme Outline Planning Application 11/90621/OUTODA and associated detailed approvals
- Sugar House Lane Scheme, Planning Application, LTGDC-12-012-FUL
- Bromley by Bow North Scheme, Planning Application, LTGDC-11-070-FUL & LBTH ref: PA/11/02423
- Bromley-by-Bow South Scheme, Planning Application, LTGDC-09-099-OUT & LBTH ref: PA/09/02574

16. Delivery and Implementation

- 16.1. The vision, policies and proposals within this plan cannot be delivered by the Legacy Corporation in isolation but require the involvement of a wide range of partners within the public and private sectors and the involvement of local communities, both those who live and work within the area now and those who will live in the new communities when they are developed and those who will work or run businesses in the area in the future. In its role as a local planning authority, the Legacy Corporation will use its responsibility to determine applications for planning permission, listed building and conservation area consent applications and, where necessary its powers to take planning enforcement action, to achieve the outcomes sought through this Plan.
- 16.2. As a development corporation, the Legacy Corporation also has interests in and ownership of some land within its area. These assets and interests will also be utilised in a way that enables it to meet its regeneration and development aims, delivering the long-term legacy of the 2012 Games to east London and London as a whole. Where appropriate for the purposes of the regeneration of the Legacy Corporation's area or for purposes incidental to those purposes, the Legacy Corporation will also consider the use of its compulsory purchase powers.

Strategic Policy SP8: Delivery and Implementation

The Legacy Corporation will work with all relevant partners in the public and private sectors in seeking to ensure that new development within its area promotes and supports the opportunities and the policies within this plan, and to secure the investment required to deliver the infrastructure necessary to support that development and growth. It will use S106 Planning Obligations and, once implemented, its Community Infrastructure Levy to ensure that new development contributes towards meeting the infrastructure need that it will generate in accordance with Strategic Policy SP5 of this Plan.

S106 Legal Agreements

- 16.3. S106 of the Town and Country Planning Act 1990 allows local planning authorities to enter into a legal agreement with a developer that would make a development proposal acceptable in planning terms, that would not otherwise be acceptable. That might, for example, include the amount of affordable housing which would be included in the development scheme, or an item of infrastructure, or financial contribution towards it, such as a new school or the provision of a new highway junction.

Policy DI1: S106 Planning Obligations and Community Infrastructure Levy

The Legacy Corporation, in its role as Local Planning Authority, will use S106 Planning Obligations, where necessary and in accordance with Section 106 of the Town and Country Planning Act 1990 and other relevant legislation and Government Guidance, to secure:

- those aspects of development schemes that are necessary for the scheme to obtain planning permission, including meeting the requirements of policy in this Plan, the London Plan or the National Planning Policy Framework;
- the delivery of necessary infrastructure, where this is required on the site of the proposed development;

- the delivery of infrastructure off-site and where that infrastructure is not listed within the adopted CIL Regulation 123 List.

Community Infrastructure Levy and the Infrastructure Delivery Plan

- 16.4. A Community Infrastructure Levy is proposed for the Legacy Corporation Area that would raise money towards meeting the cost of the infrastructure required to meet the needs of new development within its area. To be supported by CIL funding the infrastructure must meet this test, although it can be located within or outside the Legacy Corporations administrative boundary.
- 16.5. An Infrastructure Delivery Plan has been prepared which identifies the infrastructure that will be needed to support the planned growth within the Legacy Corporation area, identifying the potential funding gap that exists for the delivery of this. It is intended that this is reviewed annually and updated as necessary as part of an annual monitoring process. A CIL Regulation 123 list will be published alongside the adopted Community Infrastructure Levy Charging Schedule. This will set out which items of infrastructure the Legacy Corporation intend to be wholly or partially funded from the CIL charge. Where an item of infrastructure is part of the Regulation 123 list, it would not be appropriate to require a planning obligation securing that item of infrastructure or any separate financial contribution towards it. The Regulation 123 List will also be the subject of an annual review.
- 16.6. A Supplementary Planning Document will be produced which will set out how S106 Planning Obligations will be used in the Legacy Corporation area, the relationship between this and the Community Infrastructure Levy and the Regulation 123 List.

Compulsory Purchase

- 16.7. “Compulsory Purchase powers are provided to enable acquiring authorities to compulsorily purchase land to carry out a function which Parliament has decided is in the public interest. Anyone who has land acquired is generally entitled to compensation.”⁸
- 16.8. The Legacy Corporation has compulsory purchase powers under section s.207 (2) of the Localism Act 2011, as well as powers to override easements and other rights affecting its land under s. 208 of the Localism Act 2011.
- 16.9. It may be appropriate in the interests of the proper planning of the Legacy Corporation area for the Legacy Corporation to acquire properties using these powers, if this would facilitate the regeneration of its area, and this regeneration could not be achieved without using these powers. The Legacy Corporation will follow the guidance as set out in ODPM Circular ‘06/2004 and 04/2010 Compulsory Purchase and the Crichel Down Rules’ in deciding whether use of its’ powers would be appropriate.

Policy DI.2 Compulsory Purchase

The Legacy Corporation will use its powers to compulsorily purchase land where it considers that such acquisition is appropriate for the purposes of the regeneration of its area or for purposes incidental to those purposes.

⁸ Compulsory Purchase and Compensation Booklet, ODPM 2004
London Legacy Development Corporation Local Plan Interim Consultation Document/draft/vs0.1
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17. Glossary

Access - Refers to the methods by which people with a range of needs (such as disabled people, people with children, people whose first language is not English) find out about and use services and information (London Plan, LP).

Accessibility - Refers to the extent to which employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available. It also refers to the extent of barriers to movement for users who may experience problems getting from one place to another, including disabled people (LP).

Affordable Housing - Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision (NPPF).

Affordable Rented Housing - Let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable) (NPPF).

Affordable Workspace - Affordable workspace is made available to tenants for a rent that is below the prevailing market rent for that type of space (LP).

Archaeological interest - There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them (NPPF).

Area Action Plan (AAP) - A type of Development Plan Document that is used when there is a need to provide the planning framework for areas where significant change or conservation is needed (for example key regeneration areas) (LBTH).

Biodiversity - This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society (LP).

Blue Grid - A network consisting of the River Thames and the rivers, streams, canals, docks and other open water spaces throughout the borough and the land alongside them (LBTH).

Blue Ribbon Network - A spatial policy covering London's waterways and water spaces and land alongside them (LP).

Central Activities Zone -The Central Activities Zone is the area where planning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities, as well as residential and more local functions (LP).

Community - Usually refers to those living within a specific area but can be any group with shared needs or interests living in the Legacy Corporation boundary, as well as those with business interests and the working population (LLDC Statement of Community Involvement).

Community Infrastructure Levy (CIL) - Standard charge determined by the local planning authority and levied on new development (an amount per square metre). The monies raised will be used to pay for infrastructure (LLDC Statement of Community Involvement).

Connectivity - Refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle (LBTH).

Conservation - The process of maintaining and managing change to a heritage asset in a way that sustains and where appropriate enhances its significance (Bradford).

Conservation Area - This is an area of special architectural or historic interest designated by the Council under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Development is controlled more tightly in order to preserve or enhance their special character and qualities (Bradford).

Contaminated Land - Previous industrial processes disposed of waste by tipping it on the land, raw materials and fuel were often spilt 'contaminating' the land at the sites. Pollution to rivers, groundwater, lakes etc. can occur by the leaching of contaminants out of the soil into water courses through the natural drainage of the soil, or through surface runoff of water eroding and transporting contaminant materials into water courses. This in turn can have negative impacts on aquatic plant and animal life, and affect the quality of human drinking water. Typically, such sites are 'cleaned up' during the planning process (LBH).

Convenience Goods - Food and non-alcoholic beverages, tobacco, alcoholic beverages, newspapers and periodicals and non-durable household goods (LLDC CIL draft).

Convergence - The principle drawn from the Strategic Regeneration Framework that the Mayor of London and the Growth Boroughs use the 2012 Games and its Legacy to ensure that the communities who hosted the 2012 Games will have the same social and economic chances as their neighbours across London by 2030.

Creative Industries - Industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property (LBWF).

Density - In relation to residential developments, a measurement of the number of dwellings per hectare (Bradford).

Development - Development, as defined under the 1990 Town and Country Planning Act is "the carrying out of building, engineering, mining or other operation in, on, over or under

land, or the making of any material change in the use of any building or other land.” Most forms of development require planning permission (LLDC Statement of Community Involvement).

District Centre - Provide convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000–50,000 sq.m of retail floorspace. Some District centres have developed specialist shopping functions (LP).

Energy Hierarchy - The Mayor’s approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand, the second step is to supply energy efficiently and the third step is use renewable energy (LP).

Energy Efficiency - Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience. This does not necessitate the use of less energy, in which respect it differs from the concept of energy conservation (LBWF).

Family Housing - Generally defined as having three or more bedrooms (LP).

Floodplain - Flat or nearly flat land adjacent to a stream or river that experiences occasional or periodic flooding (LBWF). The functional floodplain comprises the land where water has to flow or be stored in times of flood (NPPF).

Greater London Authority (GLA) - The GLA is the strategic citywide government for London. It is made up of a directly elected Mayor (the Mayor of London) and a separately elected Assembly (the London Assembly). (LBWF)

Green Corridor - This refers to relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join (LBN).

Green Belt - National policy designations that help to contain development, protect the countryside and promote brownfield development, and assists in the urban renaissance (LP).

Green Grid - Network of interlinked multi-functional and high quality open spaces that connect with town centres, public transport nodes, the countryside in the urban fringe, the Thames and major employment and residential areas (LBH).

Green Infrastructure - The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole (LP).

Greenway – The Greenway is the permissive path and green space that provides pedestrian and cycle access over the Thames Water Northern Outfall Sewer between Fish Island and Beckton. Within the Legacy Corporation Area it runs between Fish Island and West Ham.

Gypsy and Travellers' sites - These are sites either for settled occupation, temporary stopping places, or transit sites for people of nomadic habit of life, such as travellers and gypsies (LP).

Heat Network - Heat networks supply heat from a central source directly to homes and businesses through a network of pipes carrying hot water. This means that individual homes and business do not need to generate their own heat on site (gov.co.uk).

Heritage Assets - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing) (NPPF).

Houses in Multiple Occupation (HMOs) - Small shared dwelling houses occupied by between three and six unrelated individuals as their only or main residence, who share basic amenities such as a kitchen or bathroom (LP).

Hub - A centre around which other things revolve, or from which they radiate; a focus of activity, commerce, transportation etc...(Online Dictionary)

Inclusive Design - Inclusive design creates an environment where everyone can access and benefit from the full range of opportunities available to members of society. It aims to remove barriers that create undue effort, separation or special treatment, and enables everyone to participate equally in mainstream activities independently, with choice and dignity (LP).

Industrial Business Park (IBP) - Strategic industrial locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and small scale distribution. They can be accommodated next to environmentally sensitive uses (LP).

Infrastructure - Services that are necessary for the day-to-day functions of the community and economy such as roads, railways, and social and community facilities. Infrastructure includes utility services, transport, schools, health and leisure services, and energy (LBTH).

Infrastructure Delivery Plan (IDP) - Identifies the existing social, transport and utilities infrastructure within the LLDC area over the period 2014 to 2031. It is based on publically available information and consultation with the boroughs and infrastructure providers (LLDC IDP).

Intermediate Housing - Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above . These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing (LBN & NPPF).

Legacy Corporation's Legacy Communities Scheme - The Legacy Communities Scheme sought permission for the long-term development of five new neighbourhoods within the future Queen Elizabeth Olympic Park. Planning Application Reference: 11/90621/OUTODA (LLDC webpage).

Listed Buildings - Includes both local and statutory listed buildings. Locally listed buildings are those that satisfy one or more of the following criteria: historic interest, architectural interest or environmental significance. Statutory listed buildings are buildings of special architectural or historic interest, they are graded as I, II* or II with grade I being the highest. Statutory listing includes the interior as well as the exterior of the building, and any buildings or permanent structures (e.g. walls within its curtilage). English Heritage is responsible for designating buildings for statutory listing in England. Buildings listed as Grade 1, Grade 2 or applications for demolition of the Council's own buildings are subject to English Heritage Direction (LBH).

Local Development Order - An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development (NPPF).

Local Identity - Aspects of the historic and built environment that the Legacy Corporation considers most important to delivering the quality of development that will be expected for its area (LLDC Local Plan).

Main town centre uses - Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Managed Workspace - Normally comprises a number of business units or workspaces for individuals and/or small businesses which together are communally managed and provided with a range of support services and facilities.

Metropolitan Open Land (MOL) - Is strategic open land within the urban area that contributes to the structure of London (LBN).

Metropolitan Town Centre - The second category of town centres defined by the London Plan serving wide catchment areas covering several boroughs and offering a high level and range of consumer durable goods. They typically have over 100, 000 square metres of retail floorspace, including multiple retailers and department stores (LBH).

Mixed-use Development - A well integrated mix of land uses (retail, employment, leisure and other service uses) with decent homes of different types and tenures to support a range of household sizes, ages and incomes (LBWF).

National Planning Policy Framework (NPPF) - Published on 27 March 2012. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system. It provides London Legacy Development Corporation Local Plan Interim Consultation Document/draft/vs0.1 PROTECT - POLICY

a framework within which local people and their accountable local planning authorities can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities (LLDC Statement of Community Involvement).

Neighbourhood Centre - Typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sq.m), sub-post office, pharmacy, laundrette and other useful local services. Together with District centres they can play a key role in addressing areas deficient in local retail and other services (LP).

Open Space - All land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers a broad range of types of open space, whether in public or private ownership and whether public access is unrestricted, limited or restricted (LP).

Planning Permission - Formal approval given by the planning authority, allowing a proposed development to proceed. Permission may be sought in principle through outline planning applications, or in detail through full planning applications (LLDC Statement of Community Involvement).

Preferred Industrial Location (PIL) - Strategic industrial locations that are particularly suitable for general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities (LP).

Protected Views - Desirable views, vistas and sightlines that warrant protection through local planning policy (LLDC Local Plan).

Public Realm - This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces (LP).

Section 106 Agreements - These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990 (LP).

Sense of Place - A place with a positive 'feeling' for people and local distinctiveness, creating the concept that a place has its own identity and providing a focus for the community and civic activity, and an attractive, accessible and safe environment for businesses, shoppers and residents (LBH).

Social Rented Housing - Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency (NPPF).

Specialised Housing - Housing which meets the specialised housing needs of groups such as the elderly and disabled people (LBWF).

Strategic Housing Land Availability Assessment (SHLAA) - An assessment of land availability for housing which informs the London Plan and borough local development documents (LP).

Strategic Industrial Locations (SIL) - These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks and exist to ensure that LLDC provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses, logistics, waste management and environmental Industries (such as renewable energy generation), utilities, wholesale markets and some transport functions (LP).

Strategic Regeneration Framework (SRF) - An agreement of public sector action to address the issues facing those living in deprived areas.

Sub-area - Sub-areas make up a geographical framework for implementing strategic policy (Adapted from LP).

Superstores/supermarkets - Shopping destinations in their own right where food and convenience shopping needs are met and which can also include non-food floorspace as part of the overall mix of the unit (LLDC CIL draft).

Supplementary Planning Document (SPD) - A Local Development Document that may cover a range of issues either focusing on a specific area or theme, and provides further details of policies and proposals in a 'parent' document (LLDC Statement of Community Involvement).

Supplementary Planning Guidance (SPG) - Supplementary Planning Guidance may cover a range of issues, both thematic and site specific and provide further detail of policies and proposals in a development plan. Similar to SPDs, SPGs were produced prior to the 2004 Planning and Compulsory Purchase Act, covering similar matters (LBH). Supplementary Planning Guidance is also produced by the Mayor of London to provide further guidance to policies within the London Plan.

Sustainable Development - The core principle underpinning the planning system. "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (World Commission on Environment and Development (WCED). Our common future, 1987) (LLDC Statement of Community Involvement).

Sustainable Urban Drainage System (SUD) - A sequence of water management practices and facilities designed to drain surface water in a manner that will provide a more sustainable approach than the conventional practice of routing run-off through a pipe to a watercourse (LBWF).

Tall Buildings - Buildings or structures that are significantly taller than surrounding development (LBH).

The London Plan - The Regional Spatial Strategy for Greater London prepared by the Mayor of London, which the Local Plan must be in conformity with (LBTH).

Transport for London (TfL) - The primary role of TfL, which is a functional body of the Greater London Authority, is to implement the Mayor of London's Transport Strategy and manage transport services across London (LBWF).

DRAFT

18. Glossary for Themed Maps

Economic Activity Map (Page 37)

Town Centres: (see main glossary)

Primary Spines of Activity - Route which contains businesses with a frontage which is public facing activity such as shops or cafe's

Secondary Spines of Activity - Route which contains some businesses along the route which are public facing to provide activity.

Local Industrial - These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks and exist to ensure that the Legacy Corporation provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including general and light Industrial uses.

Employment mix: Areas which provide an employment offer.

Culture mix - A mix of employment and homes with a liberal spattering of cultural activity in terms of arts, artist studio space and cultural.

Leisure: Leisure, Sports and Recreation Activities.

Character of Urban Fabric (Page 70)

Existing Conservation Areas - Existing designated Conservation Areas.

Terraced Houses - Predominantly terraced and semi detached residential building typology in an area.

Low Rise Houses - Built form of the area in North Hackney Wick which includes single storey buildings.

Large Floor plates - Commercial area with tall buildings which have a large floor plate and accessible perimeter.

Adaptable Mix use with Industrial Heritage - Industrial buildings which allow for a range of flexible uses based around a narrow active street pattern.

Medium Grain - Medium density neighbourhood providing legible network of streets.

Green Spaces (Page 88)

Wild Parkland - Areas of parkland and/or verge which are predominantly bio diverse

Parkland - Areas of parkland.

Sports Pitches - Areas specifically designated for sports.

Rivers and Canal - Rivers and Canals.

Allotments - Allotments

Wild - Wild Bio diverse areas not within parks.

Playspace - Areas designated for play

Connections (Page 110)

Principal Routes - Principal routes between neighbourhoods usually trafficked that can be used 24 hours a day.

Park and towpath routes - Routes that fall predominantly along parks or towpaths

Future Connection - Proposed connection which has broadly been agreed

Existing Routes in need of improvement - Routes which exist and need to be either made safe or accessible.

Indicative future connections - Routes which connect two points and indicate a desired route between them but where this route needs further feasibility scoping.

19. Abbreviations

BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method
CIL	Community Infrastructure Levy
DPD	Development Plan Document
GLA	Greater London Authority
HMO	Housing in Multiple Occupation
IBC	International Broadcast Centre
IDP	Infrastructure Delivery Plan
IBP	Industrial Business Park
LLDC	London Legacy Development Corporation
MOL	Metropolitan Open Land
MPC	Media Press Centre
NPPF	National Planning Policy Framework
PTAL	Public Transport Accessibility Level
QEOP	Queen Elizabeth Olympic Park
SHLAA	Strategic Housing Land Availability Assessment
SIL	Strategic Industrial Location
SMEs	Small and Medium sized Enterprises
SPG	Supplementary Planning Guidance
SRF	Strategic Regeneration Framework
SRQ	Sustainable Residential Quality
SUDS	Sustainable Urban Drainage Systems
TfL	Transport for London

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Interim Consultation Report Autumn 2013



Foreword

In 2012, the Mayor of London established the London Legacy Development Corporation. The purpose of the Legacy Corporation is *“To promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”*.

As the Local Planning Authority for its area, the Legacy Corporation is required to prepare a Local Plan, setting out the Legacy Corporation’s strategy for the sustainable development of its area a whole and a number of supporting documents, such as the Infrastructure Delivery Plan. In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), the Legacy Corporation is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. This document is an Interim Consultation Report informed by the SCI and sets out how the Legacy Corporation has involved the community in the early stages of the draft Local Plan development process. This document will eventually form part of a wider Consultation Report that will demonstrate how the Legacy Corporation complies with its SCI, involving the community and key stakeholders in the preparation of the final Local Plan, including the forthcoming non-statutory stage of consultation on the draft Local Plan.

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1.0 Introduction

1.1 Purpose of the Local Plan

The Local Plan is a spatial strategy that will set out the planning policies to guide development within the Legacy Corporation administrative boundary. The document will give clarity to developers, public sector bodies, the local community and other interested parties regarding policies and will enable the effective determination of planning applications.

The overall purpose of the Local Plan is to respond to the needs of existing and future communities and provide a basis for the regeneration of the Legacy Corporation area to achieve socio-economic convergence with the rest of London over the period to 2030.

1.2 Legacy Corporation Statement of Community Involvement

In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), the Legacy Corporation as a Local Planning Authority is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. The SCI sets out how and when the Legacy Corporation will involve the community and key stakeholders in the preparation of local planning policy documents and in the processing and determination of planning applications.

1.3 Purpose of the Local Plan Consultation Report

This Interim Consultation Report sets out how the Legacy Corporation has complied with its adopted SCI, involving the community during the early stages of the draft Local Plan development process. It details the following:

- When/ The programme of consultation;
- Who/ The people consulted;
- How/ The methods of consultation;
- A summary of the issues raised during consultation; and
- How these issues have been addressed in the Local Plan.

The final Consultation Report will demonstrate to the Inspector at the Examination in Public that the Local Plan complies and exceeds the minimum requirements for community and stakeholder involvement set out in national and local borough legislation and guidance.

Documentation and evidence of the consultations outlined in this report will be made available upon request and/or will be included in the final Consultation Report Appendix.

2.0 Consultation Process and Programme

2.1 The Consultation Strategy

The consultation strategy consists of our consultation programme. The consultation programme has been developed on a contingent basis. When new issues have risen through the Local Plan production process, new consultations have been arranged and carried out. This strategy ensures that the “who, how, and how much” of consultation is appropriate to the stage of Local Plan production and the scale of the issue. This strategy has been discussed and approved by stakeholders at various meetings and carried out in accordance with the requirements of the Regulations and the SCI.

2.2 The Process of Local Plan Production and Engagement Overview

The following is an outline of the different stages undertaken in the production of the Local Plan:

- Stage 1. Regulation 18: Preparation of the Local Plan
- Stage 2. Regulation 19: Publication of the draft Local Plan
- Stage 3. Regulation 22: Submission of Local Plan to the Secretary of State
- Stage 4. Regulation 24: Independent Examination
- Stage 5. Regulation 25: Publication of Inspector’s Report
- Stage 6. Regulation 26: Adoption of the Local Plan

At each stage in the production of the Local Plan, the SCI obligates the Legacy Corporation to carry out the following community and key stakeholder engagement:

	Preparation (R.18)	Publication (R.19)	Submission (R.22)	Examination (R.24)	Inspectors Report (R. 25)	Adoption (R.26)
Letter/ Email to all known consultees	✓	✓	✓	✓	✓	✓
Leaflet distribution to key locations in the area	✓	✓				
Legacy Corporation e-newsletter	✓	✓	✓	✓	✓	✓

	Preparation (R.18)	Publication (R. 19)	Submission (R.22)	Examination (R.24)	Inspectors Report (R. 25)	Adoption (R.26)
Local Plan newsletter	✓	✓	✓	✓	✓	✓
One to one meetings with key stakeholders	✓	✓				
Meetings with residents associations/ other interest groups	✓	✓				
Focus groups	✓	✓				
Public meetings	✓	✓				
Workshops	✓	✓				
Public displays/ exhibitions	✓	✓				
Hotline/ contact number/ dedicated email address	✓	✓	✓	✓	✓	✓

The below (2.3) sets out how the Legacy Corporation adheres to and exceeds these obligations in the development of the Local Plan; facilitating opportunities for the local community and key stakeholders to inform Local Plan policies.

2.3 Who did we consult and how?

Letter/ Email to all known consultees:

A letter has been sent to all known consultees at key stages in the consultation process. The consultees included all local residents and every individual or organisation on the Consultation Database. The Consultation Database was set up

at the outset of Local Plan preparation, listing and recording the contact details of people interested and/or consulted in the Local Plan production process, such as Ward Members, General and Specific bodies set out in the Regulations. At each consultation event there has been the opportunity to sign up to the database and the database has been added to on a contingent basis, supporting the responsive and open consultation strategy. At key stages in the consultation process, notification has been sent to local residents and these contacts, informing them of the relevant consultations and inviting their representations and/ or attendance during consultations. This included (but is not limited to) notification of the Early Engagement Formal Consultation Questionnaire and Call for Sites.

Contact number/ dedicated email address:

A telephone number, address and email for correspondence relating the Local Plan has been made available at consultations, placed on consultation media and is available on the Legacy Corporation website. At consultation events people have been actively encouraged to contact the Legacy Corporation should they have any questions, issues or interests they would like to raise with regard to the Local Plan, especially in the early stages of Local Plan development so that issues can be addressed early on in the plan-making process.

Leaflet distribution to key locations in the area:

An Early Engagement Formal Consultation Questionnaire including a Call for Sites request was sent to registered addresses within the Legacy Cooperation area (including residential and business properties) and individuals and organisations on the Consultation Database. The questionnaire invited people to give their views on issues relating to the Local Plan. It contained a number of questions to encourage feedback and to focus responses on planning related matters. The questionnaire was colour printed in a practical (A4) size to encourage people to pick up, read and consider the questions. Once completed, responses could be delivered by hand, posted or emailed back to the Legacy Corporation. A prize draw to win tickets for a trip up the AcelorMittal Orbit was given as an added incentive to respond.

Meetings with residents associations/ other interest groups

Residents Meetings were held throughout the draft Local Plan production process. All residents in the local area were invited to attend these meetings and notifications promoting the meetings were placed in suitable and accessible locations, for example, local newspapers, borough magazines, newsletters and posters, placed in locations such as churches, community centres and schools in the area. The meetings were also promoted via local networks to facilitate publicity reaching typically harder to reach groups. Notification was given in other languages to ensure that people with English as their second language would know how to have their input. At each meeting it was highlighted that if people would like to have an additional consultation with the Legacy Corporation, for example at a specific time or location, or with a special community interest group, this would be welcomed and arranged.

Workshops and focus groups:

In combination with quarterly Residents Meetings and Biannual Olympic Park Engagement Network (OPEN) meetings, local residents and special interest groups have been invited to participate in structured workshops consisting of targeted consultation on Key Topic themes and Sub Areas in the draft Local Plan. Visual aids as well as drawing tools have been used to stimulate discussion and encourage input. For example, the Legacy Youth Panel focus group was set up to involve the youth in the Local Plan and gain insight into key aspirations and interests of young people in the area. The Panel is made up of 25 young people, between the ages of 13 and 21, from the five Olympic host boroughs. Workshops have been carried out with the Youth Panel in the early stages of the draft Local Plan production process to encourage and enable their contribution. As with Residents and OPEN Meetings, visual aids and drawing tools were used to stimulate discussion and encourage input.

Monthly Planning Policy Forum workshops were carried out with Local Borough Council officers and representatives from the GLA, TFL and the LVRPA. Throughout the workshop series Key Topic themes were discussed in detail and key issues were raised and considered by the group. This assemblage acted as a Steering Group, offering expert advice and giving reviews of work at key stages of the draft Local Plan production process.

Public displays/ exhibitions

Public displays and exhibitions have been utilised as part of workshops and focus groups. Due to the success of engagement through workshops and focus groups during the early stages of consultation on the draft Local Plan, the format of these events has been seen as effective and preferable to engagement primarily through public displays and exhibitions during the early stages of consultation. During consultation on the draft Local Plan there will be plans and illustrations to review. As a result, in this latter stage, public displays and exhibitions will be utilised to a greater extent.

One to one meetings with key stakeholders:

One to one meetings were carried out with key stakeholders during draft Local Plan preparation. The stakeholders included the necessary statutory and non statutory local and national advisory bodies, action groups and landowners. The meetings were held to discuss and identify general and site specific issues, as well as opportunities and aspirations of the stakeholder and the Legacy Corporation. For example, meetings were held with the Built Environment Access Panel (BEAP) to help embed accessibility and inclusive design within the draft Local Plan. This panel is made up of disabled people and experts on inclusive design, including local community representatives from the housing sector, minority ethnic and faith groups.

Local Plan Newsletter, including Legacy Corporation E-Newsletter

Notification of Residents Meetings were sent out and put up in suitable and accessible locations such as local newspapers, borough magazines, newsletters and posters in key locations such as churches, community centres and schools in the

area. Rather than having a newsletter solely dedicated to the Local Plan, to attract the attention a wider audience the newsletter addressed a number of items. Newsletters will also be produced for the next stage of consultation on the draft Local Plan.

2.4 Ongoing Consultation

A Consultation Plan is currently being drafted for the consultation stage for the publication of the draft Local Plan. During this stage, consultation will be set out to identify and address issues and/or opportunities raised by the publication of the draft Local Plan in order to inform the final submission of the document. Issues and/or opportunities raised post submission and adoption of the Local Plan will continue to be addressed, keeping the document up to date.

3.0 The Responses

Early Engagement

A total of 75 response forms and 118 representations were received in response to the Early Engagement Formal Consultation Questionnaire and a number of points were raised at the various early engagement meetings, workshops and focus groups. The points raised have been recorded, summarised and are outlined below. The points have then been considered and addressed in numerous meetings and responses to the points (i.e. how they have been taken into account in the Local Plan) are outlined in section 4. A total of 108 of the 118 representations were received solely in relation to the Carpenters Estate. As a result of the large quantity, these representations have been recorded, summarised and outlined separately in section 3.2. How the issues raised are being taken into account in the draft Local Plan is also outlined separately in section 4.

3.1 Key issues Raised in Early Engagement Questionnaire and Events

Community

- Provide affordable facilities, shops and restaurants
- Maintain and prioritise existing community and prevent polarisation
- Create opportunities for community management and creative contribution
- Review and update of community needs

The Legacy Corporation area has a socially, culturally and ethically diverse population. Respondents united in their interest for the area and community was raised more than any other topic area in response forms. Community facilities, the shape of the community and community management were the common themes. It was noted that new and upgraded facilities should be accessible and affordable. These facilities should support the existing and future needs of specific demographic groups (including the young, the elderly, faith groups and the local creative community), whilst helping to cross divides between and within communities.

Neighbourhoods should be shaped with community buildings as the central focus, with a balance of old and new architecture and innovative ways to utilise empty space for temporary use. Existing community interests should be protected during the development of the area, and where there are new neighbourhoods, these should house residents who set their roots in the area. It was regularly noted that local residents are keen to be involved in the development and management of the area.

Housing

- Provide affordable, low rise family housing with gardens
- Ensure higher quality housing than current development of flats
- Protect the Carpenters Estate
- Support developments that enable people to live and work in one place

Affordable Housing is a key concern for residents and government officials throughout London. The majority of interest in response forms surrounded the Carpenters Estate in Newham. 118 representations were made supporting the protection of this Estate in the face of emerging development proposals for the area. An outline of these representations can be found in section 3.2. Housing typologies were also a concern of local residents. Despite a diversity of housing tenure and flexible heights and densities promoted by some, the majority of people preferred high quality, affordable, low rise family housing and gardens. It was agreed during workshops that there should be height variation, yet within certain parameters. There was common interest in Hackney Wick for live/ work units and residential units connected to studio and workshop space.

Open Space and Biodiversity

- Protect and enhance open space and biodiversity
- Adhere to 'Blue Ribbon' network policies
- Flood management and "sequential approach" testing
- Protect of yard spaces and canals for traditional ways of life

London has been identified as the greenest World City by the Greater London Authority. People expressed significant Interest in open space and biodiversity in response forms and this was the third most discussed topic. People recommended that certain areas should be protected for natural wildlife, while other areas should be modified for increased biodiversity and/or outside activities for local communities, such as allotments. The designation for Metropolitan Open Land needs to be reconsidered. The waterways were frequently noted. People viewed the waterways as a place for leisure and transport, with a few people suggesting that the waterways provide an opportunity for community friendly commercial use. Boating communities were also supported by people stating that canal boats add to local character and improve public safety along the towpaths. The existing boating communities are also keen their way of life is not disturbed by the new developments. It was regularly noted that all open space should be clean, safe and well integrated into surrounding neighbourhoods.

Transport and Connectivity

- Improved strategic and local connections
- Provision for sustainable transport modes
- Exemplar standards for cycle routes and storage
- Safe access

Respondents were keen for improved transport connections and sustainable transport. It was upheld that both local and strategic connections need to be better. For example, specific site connections across the Lea Navigation and through the viaduct at Hackney Wick station, as well as connections to key centres of regeneration including the Royal Docks and Canning Town. For further examples given see Appendix X. Sustainable transport was the top priority and improved walkways and cycle paths were requested. It was noted that the London Cycle Design Standards and the London Plan Cycle Parking Standards are currently being revised and development should meet the new standards. Temporary cycle provision and storage should be located at major venues on the Queen Elizabeth Olympic Park. People regularly asserted the need for transport routes to be safe, well lit and accessible for disabled people, especially to and from key development areas. Stimulating transport connections were raised in the context of public realm improvements. There were also regular requests for the reinstatement of Carpenters Road.

Climate Change and Energy

- Mitigate climate change and reduce CO2 emissions
- Reduce the need for travel
- Consider sustainable land use options and local energy sourcing
- Employ high environmental standards

In response to the question dedicated to people's perception of sustainable development in the early engagement questionnaire there was a lot of interest relating to Climate Change and Energy. People's main concern and interest was mitigating climate change and reducing CO2 emissions. People suggested ways to achieve this. The most frequently noted recommendation was reducing the need for travel. Other suggestions included local sourcing of materials, local energy generation and local facilities for recycling, strategies that enable people to live and work in close proximity, utilising the canal for freight and statements such as "only take what we need". As with transport, it was noted that high environmental standards will be expected, higher than those set by the ODA. It was also raised that it is important to prepare for the affects of climate change and flood risk mitigation techniques will be essential.

Policy Commitment

- Have regard for existing policies, however push for exemplar standards
- Adhere to the definition of sustainable development used in the NPPF
- Create flexibility in the Local Plan so that places can adapt over time
- Identify policies that will be superseded by the Local Plan

There was a general positive regard for existing policies, including the NPPF, London Plan, OLSPG, Hackney Wick AAP and FI AAP. For example, it was stated that allocations must reflect the Mayor's adopted London Plan policies on Waste Self Sufficiency and Waste Capacity. However, there was a noted inconsistency between the Fish Island AAP and Hackney Wick AAP Local Centre and Retail designations. It was suggested that this inconsistency needs to be resolved and supported by the necessary evidence base. There was concern for the flexibility of new policies. In contrast to many local residents preference for low rise buildings, developers requested flexibility with regard to building heights, densities and housing typologies. The implications and significance of Development Management policies were also noted. It was suggested that when the Local Plan is in place, applications in accord with Local Plan should be approved without delay, and when there no policies are relevant, permission should be based on adverse impacts versus benefits, assessed against the NPPF. It was raised that new policies will have an impact on existing policies, and it should be clear which policies will be superseded when the Local Plan comes into place.

Business Growth

- Opportunities for small and traditional business
- Protection and support for existing local enterprise
- Support businesses that attract middle and high earners to live and work
- Prevent monopolies

The majority of people were keen to support existing, traditional and local business and prevent the domination of monopolies. However, respondents also noted that it will be important to support the growth of businesses that attract middle and high income earners to live and work. Business growth and designations for commercial space were regularly noted in association with specific locations. Key growth areas with good access to the rest of London, such as the iCITY media centre and Stratford were noted to be in need of ancillary services for business. Land adjacent to the canal was noted as a potential location for community friendly commercial use. Affordable workspace was requested, and live/work units advocated in the Hackney Wick area.

Education

- Prepare for quality and timely delivery of education facilities
- Enable some flexibility on the use of sites to provide for future needs
- Provide education to deliver expansion and diversification of economy
- Support community libraries, heritage centres and information points

Responses indicate that it is vital that education is looked at with regard to existing and future needs of the population. This includes assessing needs for affordable childcare, nurseries, primary, secondary and further education, as well as training for unemployed residents, including support for mothers. It was noted that quality and timely delivery of education infrastructure, with some flexibility on the use of sites will be essential in order to deliver the educated facilities needed in the area. Some local borough councils outlined specific education needs. Hackney Council identified the need for eight - ten forms of entry by 2018 in the primary sector to meet demands for

places arising from residential development within the AAP area. In general it was noted that education and training will be necessary to deliver the expansion and diversification intended for economic growth. Universities were cited as hubs of innovation, research and technology that would attract investment and provide infrastructure to support business growth. There was also interest in education being integrated with leisure activities. For example, a community led waterways heritage and education centre located beside the Canal.

Urban Design and Design Quality

- Stipulate high design standards
- Ensure sensitive integration of new developments with existing environment
- Restrict building heights
- Improve streetscape, create clean, safe, accessible and appealing public space

High quality urban design was supported in response forms. People were opposed to gated developments and asserted that new developments should be sensitively integrated with the existing local environment. Concerns were sighted over the heights of new buildings. Some people were keen for flexibility with regard to building heights, whereas the majority were keen for building heights to be low and restricted. It was noted that the Hackney Wick AAP and Fish Island AAP stipulate a maximum of 4-6 storeys. It was noted that views to the Velodrome, Stadium and Orbit should be protected. Issues surrounding the streetscape were raised. It is important to people that streets become cleaner, safer and more accessible. Where necessary, shops should be refurbished to a higher standard. In terms of residential development, people advocated the BREEAM Code for Sustainable Homes.

Jobs

- Designate, consolidate and intensify sites for employment generation
- Protect existing industrial and employment capacity
- Create affordable employment space for local population
- Support higher value employment uses in emerging growth sectors

There is a high level of unemployment in the four boroughs surrounding the Legacy Cooperation area. The creation of employment opportunities in the area is important to people. People supported the protection and consolidation of existing employment land, as well as the development of employment land at the margins. Debate was raised over the boundaries of Strategic Industrial Land (SIL) and Local Industrial Land (LIL) land in Fish Island. As a result, these boundaries should be considered and justified. It was argued that the loss or reduction of industrial and employment capacity should be refused, unless the industry is no longer suitable. A range of employment opportunities were raised. It was argued that there should be provision for traditional, local businesses and affordable workspace for the existing population as well as support for higher value employment uses in emerging growth sectors.

Area Character & the Historic Environment

- Maintain existing character
- Protect creative and diverse communities and the spaces they inhabit
- Conserve and preserve heritage

- Prioritise creative re-use of buildings over demolition

Area Character was frequently discussed in relation to human activity and the historic environment. People argued that the existing local culture and sense of community help to form the local character, setting it apart from other areas in London. Creative and diverse communities that live and work in the area were advocated as contributing to the local character and it was argued that the spaces they inhabit need protection in the face of new development. Certain areas and building were also highlighted as in need of protection, including the Three Mills Area and the Percy Peanut Factory Buildings. People prioritised conservation and creative re-use over demolition of existing buildings. It was asserted that new development should not be at the cost of local character.

Health & Wellbeing

- Support developments that facilitate positive social interaction
- Provide quality infrastructure and facilities that improve physical health
- Improve walkways and cycle paths to incentive physical activity
- Create public safety improvements

One of the twelve land use planning principles in the NPPF is to support local strategies to improve health, social and cultural wellbeing. In the response forms health and wellbeing were associated with positive social interaction, physical health and security. It was argued that the type of interaction encouraged by new developments should be considered. New developments should aim to facilitate positive social interaction and community spirit. Provision of quality infrastructure and facilities that improve physical health were supported. Examples given by people include the GP at the Carpenters Estate, healthy food stores, gyms, appealing walkways and cycle paths. To improve security, people suggested that pathways should be well lit. It was noted that thought should be given towards lighting the greenway.

3.2 Key Issues Raised in Carpenters Representations

A total of 108 of the 118 representations received were in relation to the Carpenters Estate. A total of 98 of these were from a group of local residents who made matching representations and an additional 10 were made by individual stakeholders, all arguing for the retention of the Carpenters Estate. An outline of these representations and the key points raised by these people are below.

Carpenters Estate Representations

Key points raised

- Existing Housing Crisis in Newham
- “Betrayal” by Newham Council
- Quality community life in the Estate that should be protected
- Quality housing in the Estate that should be retained

- If demolition occurs, residents should be relocated together, to low-rise, affordable housing with gardens

Representations outlined the existing housing crisis in Newham. People stated that Newham is currently experiencing the worst overcrowding in England. Homelessness has increased every quarter since the beginning of 2012, Newham has approximately 32000 on its waiting list, 2319 homeless households are in temporary accommodation of which 1522 are families (Shelter Records). People argued that the existing housing stock on the Carpenters Estate should be retained to support these people and the existing residents and alternative plots of land should be sought for new development proposals.

People portrayed a sense of betrayal from Newham Council regarding the future of the Estate. People stated that activities of the Council have not supported the interests of the existing community. People noted that the primary focus of the UCL proposal will be academic and this does not reflect the interests of residents. The residents' preference for low rise housing is also being disregarded. One respondent noted that although the Mayor of Newham announced that residents of the Estate would have the 'Right to Return' on the BBC News in February 2012, in reality it appears that the Council supports the redevelopment of the site and the permanent removal of existing residents from the site.

People cited that Clays Lane housing project was demolished so that space could be made available for the Olympics. This housing project met a particular need, specifically single people who had been homeless. It was argued that the loss of housing for this group had not been made up in Olympic housing developments so far, and people were concerned that a similar scenario could occur at the Carpenters Estate. People stated that the Legacy Corporation needs to ensure that the deficit caused by the demolishment at Clays Lane is made up and the Corporation prevents the demolishment of more affordable housing and the scattering of more communities. People requested that no regard should be given to housing proposals in the Newham Core Strategy. A separate housing needs assessment, which reflects the interests of the existing residents in the Legacy Corporation area, should be carried out.

People outlined their views of the Carpenters Estate, stressing the quality of the existing housing and community and why these assets should be protected. With regards to housing, people outlined a strong preference for affordable, low rise, terraced housing with gardens and stated that this typology facilitates social wellbeing and community cohesion. It was also put forward that within the last two years, a number of homes have been fitted with new kitchens and bathrooms, paid for by the Council. It was argued that these good quality buildings should be retained. However, if the existing houses are to be demolished, they should be replaced with new low-rise, affordable housing for the existing residents.

With regards to the community, people argued that the existing community is tolerant, cohesive and successful. Existing community facilities enable children to play safely and worship at anytime. It was stated that the Local Plan Vision must promote community cohesion and should not aim to dismantle the community. Personal memories and family histories were also described to support the retention

of the Estate. It was argued that whatever happens, it will be important to keep the existing community together.

3.3 Call for Sites

The Call for Sites was a formal consultation period undertaken between November 2012 and January 2013. The Call for Sites was carried out to enable people to suggest sites for development and/or a change of use within the Legacy Corporation area, to gather information about land that might be allocated for development in the Local Plan and to gather information for the Strategic Housing Land Availability Assessment (SHLAA) to determine site capacity and the probability of sites coming forward over the plan period.

A total of 38 sites have been put forward by respondents for consideration by the Legacy Corporation as part of the Call for Sites. A summary outlining site details received from respondents and the Legacy Corporation’s response at this stage can be found in section 4. Further information regarding the SHLAA and Site Allocations, including the processes informing these particular site details will be outlined in the forthcoming Site Report. Relevant Site Allocations, SHLAA sites and maps of the individual sites received from respondents will also be available in the appendix of the final version of this document. However, the inclusion of a particular site in this draft Interim Consultation Report is not in any way an indication that the site will come forward for development.

4.0 How the responses have been taken into account

The points raised in the Early Engagement Formal Consultation Questionnaire, various early engagement meetings, workshops and focus groups have been considered and addressed in discussions and meetings throughout draft Local Plan preparation. The draft Local Plan has been formulated to take the points and issues raised into account and the points and issues have informed a number of key elements within the Local Plan, including the Vision and Objectives, Policies, Site Allocations and a number of plans.

4.1 Early Engagement Questionnaire and Events

The below table identifies where each point and issue has been taken into account in the draft Local Plan through a relevant Vision, Objective, Policy, Site Allocation and/or additional plan. For suitability within the table, policies have been given in their number format.

Topic Area	Key Points Raised	Relevant Objectives, Policies & Plans
	Provide affordable facilities, shops and	Objectives 7: Creating inclusive spaces, 8:

Community	restaurants	Creating neighbourhoods. SP1, BEE.7, BEE.8
	Maintain and prioritise existing community and prevent polarisation	Objective 14: Convergence. SP.5
	Create opportunities for community management and creative contribution	Objective 6: Urban design and design quality. NE.10. Workshops and focus groups in the consultation process, for example with the Legacy Youth Panel.
	Review and update of community needs	SP.5, Infrastructure Delivery Plan (IDP) 2.4
Housing	Provide affordable, low rise family housing with gardens	Objective 3: Housing, H.1, H.3, SA1.1, Sub area 2: Site Allocation for Chobham Manor, Sub area 3: Greater Carpenters District
	Ensure higher quality housing than current development of flats	Objective 6: Urban design and design quality, H.2, H.1, H.6, Sub area 2: Site Allocation for Chobham Manor
	Protect the Carpenters Estate	Policy SA3.5, amenities protected.
	Support developments that enable people to live and work in one place	Objective 2: Jobs Objective 8: Creating neighbourhoods, BEE.5
Open Space and Biodiversity	Protect and enhance open space and biodiversity	Objective 12: Open space and biodiversity, SP.6, NE.5, NE.8, NE.9, NE.10, IDP 3.7
	Adhere to 'Blue Ribbon' network policies	Objective 12: Open space and biodiversity, SP.6, NE.3,
	Flood management and "sequential approach" testing	NE.4, SA1.8, IDP 5.6
	Protection of yard spaces and canals for traditional ways of life	Objective 9: Area characters and the historic environment. SP4, HBE.4, HBE.6, SA1.4
Transport and Connectivity	Improved strategic and local connections	Objective 13: Transport and connectivity, SP.5, SP.7, T.1, T.2, IDP.4
	Provision for sustainable transport modes	SP.7, T.4, accordance with London Plan, IDP.4
	Exemplar standards for	Objective 13: Transport

	cycle routes and storage	and Connectivity. T.3, T.4
	Safe access	Objective 6: Urban design and design quality, T.4, NE.2
Climate Change and Energy	Mitigate climate change and reduce CO2 emissions	Objective 11: Climate change and energy, HBE.7, HBE.8, H.1
	Reduce the need for travel	Objective 11: Climate change and energy, Objective 13: Transport and Connectivity, T.1
	Consider sustainable land use options and local energy sourcing	Objective 10: Sustainability, Objective 11: Climate change and energy HBE.7, HBE.8
	Employ high environmental standards	Objective 11: Climate change and energy, HBE.8, HBE.7
Policy Commitment	Have regard for existing policies, however push for exemplar standards	Objective 6: Urban design and design quality. HBE.1, HBE.7, HBE.8. Sub area 2: Site allocation for Chobham Manor.
	Adhere to the definition of sustainable development used in the NPPF	Visions and objectives
	Create flexibility in the Local Plan so that places can adapt over time	Vision and objectives. Wording to allow for flexibility in the future. For example, Sub area 3: Greater Carpenters District
	Identify policies that will be superseded by the Local Plan	To be completed in final plan
Business Growth	Opportunities for small and traditional business	Objective 1: Business growth, BEE.3, BEE.6
	Protection and support for existing local enterprise	BEE.3, BEE.6
	Support businesses that attract middle and high earners to live and work	Objective 2: Jobs, BEE.10
	Prevent monopolies	BEE.5, BEE.8
Education	Prepare for quality and timely delivery of education facilities	Objective 4: Education, IDP 3.2-3.4
	Enable some flexibility on the use of sites to provide for future needs	BEE.11, Sub area 3: Site Allocations

	Provide education to deliver expansion and diversification of economy	BEE.10
	Support community libraries, heritage centres and information points	Objective 8: Creating neighbourhoods, SP.4, HBE.2, IDP 3.9
Urban design and Design Quality	Stipulate high design standards	Objective 6: Urban design and design quality, SP.3, HBE.2, HBE.7, HBE.8
	Ensure sensitive integration of new developments with existing environment	Objective 9: Area characters and the historic environment. SP.4, HBE.1, HBE.3
	Restrict building heights	HBE.1, e.g. sub-area 3, Policy SA3.2
	Improve streetscape, create clean, safe, accessible and appealing public space	Objective 6: Urban design and design quality. Objective 7: Creating inclusive places, SP3, SP.6, NE.1, NE.2, NE.10,
Jobs	Designate, consolidate and intensify sites for employment generation	Objective 1: Business growth, BEE.1.Sub-area 1 (policy SA1.3) and International Quarter.
	Protect existing industrial and employment capacity	BEE.2, BEE.3, sub-area 1.
	Create affordable employment space for local population	BEE.6
	Support higher value employment uses in emerging growth sectors	Objective 2: Jobs. SP1, BEE.10, Sub area 1: i-City
Area Character & The Historic Environment	Maintain existing character	Objective 9: Area characters and the historic environment, HBE.6, H2
	Protect creative and diverse communities and the spaces they inhabit	BEE.2, HBE6, SA1.1, SA1.4, SA1.5,
	Conserve and preserve heritage	Objective 9: Area characters and the historic environment, SP.4, SA1.4, HBE.3
	Prioritise creative re-use of buildings over demolition	SP.3, SA1.4
Health and Wellbeing	Support developments that facilitate positive social interaction	Objective 8: Creating neighbourhoods, HBE.2, NE.10, NE.11, NE.12
	Provide quality infrastructure and facilities	Objective 5: Health, culture and wellbeing.

	that improve physical health	SP.6, NE.2, NE.11, NE.12, IDP 3.6
	Improve walkways and cycle paths to incentive physical activity	SP.7, T.4, IDP 4
	Create public safety improvements	H2, T.4

4.2 Carpenters Estate Representations

As outlined in 3.0, the Legacy Corporation received a large number of representations associated with the Carpenters Estate. A number of the objectives, policies and other elements of the draft Local Plan that are outlined above are relevant to the issues raised in the representations. As potential proposals for the Carpenters Estate linked to UCL have fallen away, there are no know current plans or alternative proposals that this authority is aware of for the estate, although some residents in combination with the London Tenants Federation have proposed a Community Plan for the estate. Any representations from residents based on the proposed community plan or expressing other views will be taken into account during the draft Local Plan consultation stage will be taken into account when producing the formal Publication version of the plan. At this stage, the draft Local Plan expresses an approach that allows a range of options to be developed for the future of the estate. (See policies (SA3.1-5). Meetings with the residents groups from the Carpets Estate have also been carried out to help understand the issues being raised and it will be important to take these issues into account as any specific options are developed for this area.

4.3 Call for Sites

A total of 38 sites have been put forward by respondents. A number of sites were submitted but not as Call for Sites and these will be detailed in the appendix of the final version of this document and dealt with through the Local Plan. A summary outlining site details received from respondents included in the Legacy Corporation's response at this stage can be found below. Relevant maps of the individual sites received from respondents will also be available in the appendix of the final version of this document. It is worth noting again that the inclusion of a particular site in this draft Interim Consultation Report is not in any way an indication that the site will come forward for development.

Call for Sites Response Sheet						
Reference Number	Type of respondent	Respondent	Address	Current Use	Proposed Use	LLDC Response
LPCFS35	Local Business	Foreman	Stour Rd, Fish Island, London, E3 2NT	The respondent has stated that the site is vacant and the last use was temporary hospitality for the Olympics.	The respondent has proposed residential led development with retained employment, restaurant and gallery use.	The site is within an area identified for regeneration as a mixed use area as identified in Sub area One: Hackney Wick and Fish Island, of the Local Plan Consultation Document (October 2013) and the adopted Fish Island AAP (2012).
LPCFS34	Public Body	UCL/DJDeloitte	Carpenters Estate	This site has been withdrawn by the respondent.	This site has been withdrawn by the respondent.	This site representation has been withdrawn by the respondent.
LPCFS33a	Planning Consultant	GVA	Hamlet Industrial Estate , White Post Lane	The respondent has stated that the site is currently Industrial use.	The respondent has proposed residential use.	The site is within an area identified for regeneration as a mixed use area as identified in Sub area One: Hackney Wick and Fish Island, of the Local Plan Consultation Document (October 2013) and the adopted Fish Island AAP (2012) and forms part of an area anticipated for comprehensive heritage led development. In addition to residential use, the Fish Island Area Action Plan (FIAAP) indicates that a mix of uses would be appropriate for Fish Island North, the area in which this site is located. This is reflected within the proposed strategy for the location within the Local Plan Consultation Document.
LPCFS33b	Planning Consultant	GVA	20/22 Rothbury Road	The respondent has stated that the site is currently Industrial use.	The respondent has proposed residential use.	The site is within an area identified for regeneration as a mixed use area as identified in Sub area One: Hackney Wick and Fish Island, of the Local Plan Consultation Document (October 2013) and the adopted Fish Island AAP (2012) and forms part of an area anticipated for comprehensive heritage led development. The Fish Island Area Action Plan (FIAAP) indicates that a mix of uses would be appropriate for Fish Island North, the area in which this site is located.

Call for Sites Response Sheet

LPCFS32	Community Group	Eton Mission Rowing Club	Gilbert Johnson Boathouse	Rowing Club	The respondent has proposed sports and leisure use.	The main building within this site is recognised in the Hackney Wick AAP (HWAAP) as having townscape merit and the site is also within the HWAAP Hub. Any new use will need to consider existing policies and plans relating this site. It is anticipated that a mix of uses will be appropriate in the wider area. The Local Plan consultation document (October 2013) includes the site within the proposed Hackney Wick Neighbourhood Centre where sport and leisure use would generally be appropriate.
LPCFS31	Public Body	LCR	Chobham Farm	The respondent has stated that the site is comprised of vacant areas (post Olympics), Industrial and Business use. Part of the proposed development site is public highway.	The respondent has proposed residential development with ancillary retail, community and business use.	The site has been identified as a site allocation within the Local Plan consultation document (October 2013). There is an existing permission on this site outlining an acceptance of the proposed uses, subject to a number of further considerations and actions.
LPCFS30	Public Body	LCR	Chobham Farm South	The respondent has stated that the majority of the site is vacant and the temporary offices for the Olympics are shortly to be removed.	High density mixed use development, including residential, student accommodation, hotel, car parking with the potential for edge of town centre and educational uses.	The site is identified as a Site Allocation within the Local Plan Consultation Document (October 2013). It is anticipated that this site will contain a single or mix of uses encompassing leisure, office, education or residential. Proposed uses that are in accordance with existing policies and plan would be appropriate.
LPCFS29	Public Body	LCR	Stratford International Station	The respondent has stated that the site is currently as bus layover/ taxi rank.	The respondent has proposed high density residential, hotel or commercial use above the bus layover.	The site is too small to be considered for a specific site allocation within the Local Plan. However, the site is anticipated to fall within the Site Allocation for the Stratford Town Centre Extension in the Local Plan Consultation Document (October 2013), which will encourage a range of town centre uses. The site is also located within opportunity areas set out in planning policy documents. Subject to further planning considerations, including analysis of site opportunities and constraints, additional uses.

Call for Sites Response Sheet						
LPCFS28	Developer	Charlbury Consultants	339 High Street	The respondent has stated that the site is being used for offices and storage and is approximately 50% vacant.	The respondent has proposed residential development / student accommodation.	The site is too small to be considered a specific site allocation within the Local Plan. Any specific proposals for development at this site would be considered in the light of the adopted planning policies that are in place at that time.
LPCFS27	Developer	Charlbury Consultants	206-214 High Street	The respondent has stated that the site is currently vacant and the site has previously been used as a petrol filling station.	The respondent has proposed commercial use and student accommodation, in replacement of the previously permitted residential use.	The site is too small to be considered a specific site allocation within the Local Plan. Any specific proposals for development at this site would be considered in the light of the adopted planning policies that are in place at that time.
LPCFS26	Community Group	London Gypsies and Travellers Unit	90 White Post Lane	The site is currently vacant.	The respondent has proposed a Gypsy and Traveller Site.	The site forms part of an area anticipated for comprehensive heritage led development. The site falls below the 0.25 ha threshold for site that have been considered for inclusion as a site allocation within the Local Plan.
LPCFS25	Community Group	London Gypsies and Travellers Unit	31-41 White Post Lane	The site is predominately being used for storage.	The respondent has proposed a Gypsy and Traveller Site.	The site is within the area identified within the Local Plan consultation document as part of the proposed Neighbourhood Centre around Hackney Wick Station. The site is also benefits from an extant planning permission for mixed use development. It is also a site necessary to delivering the new route through under the station and the wider plans for station improvements, as identified in the Legacy Corporation Infrastructure Delivery Plan.
LPCFS24	Community Group	London Gypsies and Travellers Unit	Bridgewater Road	The site is being used as a depot to support the development of Crossrail.	The respondent has proposed a Gypsy and Traveller Site.	The site has been identified as a site specific allocation within the Local Plan Consultation Document (October 2013) for allotments and residential development, in accordance with current extant planning permissions.
LPCFS23	Planning Consultant	Planning and Development Associates LTD on behalf of Gowlain Building contractors	1 Dorset Place	The respondent has stated that the site is currently being used as B1 commercial space.	The respondent has proposed further B1 Commercial use.	The site has been identified as part of a wider site allocation within the Local Plan Consultation Document for a comprehensive residential led, mixed use development. A current, extant, planning permission is in place for this location which reflects the site allocation use mix.

Call for Sites Response Sheet						
LPCFS22	Planning Consultant	NLP on behalf of McGrath Bros	Land at Hepscott Road	The respondent has stated that the site is currently being used as waste processing and storage.	The respondent has proposed residential led mixed use development.	The site is within an area that is considered appropriate for comprehensive heritage led mixed use development within the Local Plan Consultation Document (October 2013).. In addition, the site is identified as suitable for a mix of uses in the FIAAP and Olympic Legacy Supplementary Planning Guidance (OLSPG).
LPCFS21	Public Body	LB Waltham Forest	Eton Manor	The respondent has stated that the most recent use of the site has been for Olympic venues.	The respondent has proposed affordable, inclusive sporting and recreational facilities with potential for employment and training opportunities.	The site currently has planning permission for indoor and outdoor sports facilities and 1.2 hectares of allotments. This mix of new uses is being actively delivered as part of the post 2013 Games transformation works. Any change to the works being implemented would need to be pursued through the submission of a new application for planning permission.
LPCFS19	Developer	Bellway/Savills	Cooks Road	The respondent has stated that the site is currently industrial and commercial use.	The respondent has proposed residential led mixed use development.	The site is within a wider proposed site allocation within the Local Plan Consultation Document (October 2013). This anticipates that residential development with a significant proportion of employment space for diverse, small and medium sized businesses would be appropriate in this area as part of a wider use mix, with a particular concentration of employment uses adjacent to the River Lea. .
LPCFS18	Planning Consultant	CMA Planning	Vittoria Wharf	The respondent has stated that the site is currently occupied by a variety of uses. These include creative studios, office space and commercial units.	The respondent has proposed a mix of residential and commercial use.	The site is within the 'Fish Island Mid' area as defined by the Fish Island Area Action Plan (2012). The site also adjoins the Fish Island Conservation Area. This is identified as an area of heritage led mixed use with residential regeneration on the waterfront. This approach is reflected within the Local Plan Consultation document.
LPCFS17	Planning Consultant	CMA Planning	57 Berkshire Road	The site is currently industrial use.	The respondent has proposed a mix of residential and commercial use.	The site is within the area proposed for the Hackney Wick Neighbourhood Centre within the Local Plan Consultation document Mixed use development is supported in the OLSPG and HWAAP. The site is designated as an Other industrial Area and an Opportunity Site in the HWAAP and the site is located

Call for Sites Response Sheet						
						adjacent to the proposed hub at Hackney Wick.
LPCFS16	Planning Consultant	GL Hearn	Sugar House Lane	The site is currently partly in industrial use, partly vacant and partly under construction and development for permitted office, restaurant and exhibition space.	The respondent has noted that a variety of uses are suitable for this site, including A, B, C and D class uses.	The site benefits from a planning permission for 1200 new homes, offices, workshops and other non-residential floorspace. This is reflected within the site allocation included within the Local Plan Consultation Document, which identifies the site for a medium density mixed use area, including cluster of local retail and business space in the north of the site.
LPCFS15,14,13,12,11,10	Planning Consultant	Metropolis PD on behalf of Groveworld ltd and land owners	Wallis Road	The site is currently predominantly industrial use.	The respondent has proposed a mixed use development.	The site is within the area proposed for the Hackney Wick Neighbourhood Centre within the Local Plan Consultation document Mixed use development is supported in the OLSPG and HWAAP. The site is designated as an Other industrial Area and an Opportunity Site in the HWAAP and the site is located adjacent to the proposed hub at Hackney Wick.
LPCFS9	Planning Consultant	First plan on behalf of Aggregate Industries Uk and London Concrete	Bow Midlands Goods Yard	The respondent has stated that the site is currently industrial use.	The respondent proposed the retention of the existing use and the safeguard of rail related uses.	The site is located within the Strategic Industrial Location at Fish Island South in the Fish Island Area Action Plan. The Local Plan Consultation Document proposes to retain this SIL designation and recognise the safeguarded rail related uses.
LPCFS8	Public Body	National Grid	Rick Roberts Way	The respondent has stated that the site is currently a decommissioned gasworks site.	The respondent has proposed residential development.	The site is included within the Rick Roberts Way proposed site allocation within the Local Plan Consultation Document, which overall reflects the existing planning permission for a secondary school and residential development on the adjacent site. Overall, the site allocation would allow a mix of uses that includes residential.
LPCFS6	Developer	Urban Student Life on behalf of Duncan House property LTD	Duncan House	The respondent has stated that the site is currently educational use.	The respondent has proposed a mix of uses, including residential, education, commercial, sports, leisure and tourism.	The site is within the Greater Carpenters District site allocation within the Local Plan Consultation Document. This proposes an approach to the regeneration of this area that includes a use mix which reflects the overall existing balance of uses in its final form.

Call for Sites Response Sheet						
LPCFS5a	Planning Consultant	Quadrant Planning on behalf of Newham College	Olympic park, South of Orbit	The respondent has proposed a site adjacent to the stadium, recently used to support development during the Olympics.	The respondent has proposed educational use.	The Majority of the area identified is within the Stratford Waterfront West site allocation within the Local Plan Consultation Document. In addition to housing, the allocation identifies the potential for institutional or education uses. The OLSPG and Newham Core strategy support residential and an element of educational use within the wider area. The smaller area within the Stadium Island is adjacent to the Warm Up Track and associated facilities. It is also proposed within the Local Plan to designate this location as Metropolitan Open Land and Local Open Space. The document does, however recognise the opportunity for inclusion of compatible ancillary uses within the Stadium Island as a whole.
LPCFS5b	Planning Consultant	Quadrant Planning on behalf of Newham College	Chobham Farm South	The site is currently vacant.	The respondent has proposed educational use.	The site forms part of an area anticipated for further development and is located with a Site Allocation for Chobham Farm South in the Local Plan Consultation Document. The OLSPG identifies this location within an area of change with potential for a predominately mixed land use. The Site Allocation for Chobham Farm South identifies the area for a single use or a mix of uses, potentially encompassing an element of educational use.
LPCFS4	Local Business	Mr Michael Spinks, Essex Flour and Grain	28 Lee Conservancy Road	The respondent has stated that the site is currently commercial, warehouse and yard space for employment.	The respondent has suggested residential use.	The site is located within Employment Hub 6, Site at Junction of Lee Conservancy Road and the Eastway in the Local Plan Consultation Document. The retention of this site for employment use is supported in relevant policy documents, including the HWAAP and Hackney Core Strategy.. It is anticipated that the site designation will remain protected for employment use.
LPCFS2	Local Business	TRAD Properties	Dace Road	The respondent has stated that the site is currently being used for office space, including use of the external yard.	The respondent proposed predominately residential use, with commercial, office and leisure space.	The site is located within a wider area of Fish Island that is anticipated for comprehensive heritage led regeneration within the Local Plan Consultation Document. It is also included within the Wick Lane and Crown Close Other Industrial

Call for Sites Response Sheet

						Location within this. The Fish Island Area Action Plan identifies the location as both within an area of Heritage led mixed use regeneration and within a Local Industrial Location.
LPCFS1	Local Business	TRAD Properties	TRAD Scaffolding, Imperial Street, Bromley by Bow	The respondent has stated that the site is currently being used for office space, including use of the external yard.	The respondent has proposed predominately residential use, with commercial, office and leisure space.	The site is located within the Bromley-by-Bow proposed site allocation within the Local Plan Consultation Document. This reinforces the position outlined in the LB Tower Hamlets Core Strategy and the Bromley by Bow Masterplan, seeking a comprehensive mixed use redevelopment of the area which includes a potential new District Centre and associated infrastructure, including a new primary school, library/community facility and open space.

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Appendix 3: Draft Summary for Consultation Leaflet

What is a Local Plan and why do we have to prepare one?

On 1st October 2012, the Legacy Corporation became the Local Planning Authority for its administrative area, taking over the planning powers of the four boroughs, the Olympic Delivery Authority and London Thames Gateway Development Corporation.

As well as being responsible for determining planning applications, the Legacy Corporation has plan-making responsibilities for the area. It is preparing a single Local Plan. The Local Plan will set out a blueprint for how this area of London can fulfil its potential as London's most important regeneration project for the next 25 years, accommodating the mix of homes, business space and public amenities that will meet the needs of local people and London as a whole, embedding the achievement of the Olympic Games and opening a new chapter of success.

More specifically it sets out the requirements for new development in the area, with policies that will be used to determine applications for planning permission and identifying sites that can help to meet local and London-wide needs for economic growth and for building new homes.

What will it do?

The Local Plan Consultation Document proposes an exciting Vision that sets out how the Legacy Corporation could look at the end of the Plan Period (2031). This will be achieved through Strategic Objectives and a series of Policies covering employment, retail, housing, environmental, transport and infrastructure needs. as well as specific policies and proposals for four sub-areas.

This consultation provides the opportunity for you to have your say on the proposed direction for the proposed vision, objectives and policies, including those for each of the sub areas.

A Vision for the Legacy Corporation Area - Creating jobs and communities

Centred around the Queen Elizabeth Olympic Park, the Legacy Corporation area will become a new piece of London, where new centres and neighbourhoods reconnect surrounding areas, attract visitors and investment, and provide a focus for development that will bring economic growth, new jobs and new homes in a well designed built environment that is accessible to and useable by all. The legacy of infrastructure, restored waterways and well designed open spaces will underline the environmental quality that sets the scene for sustainable growth in economic activity and delivery of new homes. This will enable local communities to develop, grow and integrate, providing a platform for community innovation and enterprise.

As one of London's most dynamic and unique urban districts the Legacy Corporation area will provide major cultural and leisure attractions, including world class sporting venues that reinforce its role as a location of choice for business and for current and new residents.

The area will provide the opportunity for a range of business, of local and international importance, to locate in high quality premises with plentiful and excellent local through to international transport links. It will also offer a range of high quality education opportunities

and facilities, from early years to higher education and research, meeting the needs and aspirations of local communities and those of London and beyond.

In addition to excellent education, health and other community infrastructure being available within the area, development will have driven an improvement in the quality and accessibility of the existing local environment and contributed to the mitigation of climate change through delivery of sustainable buildings and open spaces, the availability of locally generated heat and power and the high level of accessibility to public transport, local shops and services.

Taken together, the many aspects of the Legacy Corporation area will make a substantial contribution to enabling residents in wider east London to achieve, at least the London average in the quality of life expected for successful London communities.

Objectives

OBJECTIVE 1, Business growth

OBJECTIVE 2, Jobs

OBJECTIVE 3, Housing

OBJECTIVE 4, Education

OBJECTIVE 5, Health Culture and wellbeing

OBJECTIVE 6, Urban Design & Design Quality

OBJECTIVE 7, Creating inclusive places

OBJECTIVE 8, Creating Neighbourhoods

OBJECTIVE 9, Area characters and the historic environment

OBJECTIVE 10, Sustainability

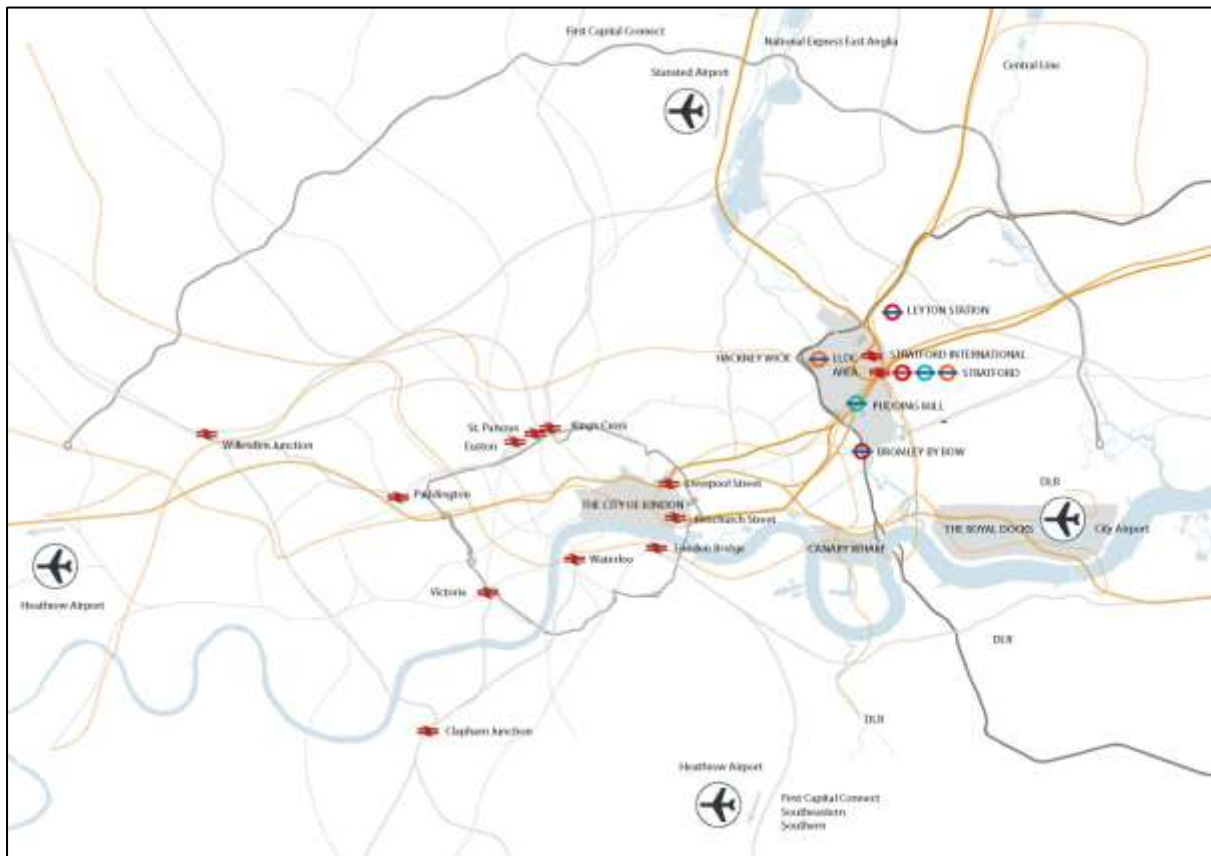
OBJECTIVE 11, Climate change and energy

OBJECTIVE 12, Open space and biodiversity

OBJECTIVE 13, Transport and Connectivity

OBJECTIVE 14, Convergence

Key Diagram



The Economy

The Legacy Corporation will draw on the opportunities created by the 2012 Games, to enhance the cultural, economic, leisure and sporting offer within the Park and surrounding areas making the transition from industrial decline and infrastructure to one, vibrant, mixed economy. The enhancement of the commercial centre at **Stratford** and creation of new economic hubs at **Hackney Wick and Fish Island** will be supported by industrial activity at smaller, employment hubs across the area. These will provide a diverse range of functions and affordability suitable for each location.

Stratford Town Centre will provide much of the additional retail, office, hotel and other commercial expansion, supported by **Bromley-By-Bow** through its role as a District Centre, integrating new retail, leisure and community uses. The new neighbourhood centre at **Hackney Wick** will offer a diverse range of economic activities; industrial premises will be supported by retail and residential whilst building upon its identity, industrial function and heritage. **Pudding Mill** and **East Village** will each function as local centres to meet localised retail and commercial requirements.

The Legacy Corporation will promote the role of training, education and establishment of research and development activity in the emerging structural change of the area's economy.

Communities

The Legacy Corporation area will see major population growth in the years ahead through the creation and expansion of communities. A large number of new homes, with a target of at least **1,432 per year**, will be built, and of size and tenure able to existing and future community needs. High quality **design, internal space, density** and **accessibility standards** will be integral to all developments.

The creation of vibrant, mixed communities is key to the Legacy Corporation's aims for enhancing the prospects of East London. A minimum target of **35% of homes across the area to be affordable**, equating to **441 per year**; requirements for other specialist housing needs including **older persons' housing, hostels** and **student accommodation**, and **Gypsy and Traveller** will be taken into account.

Built and natural environment

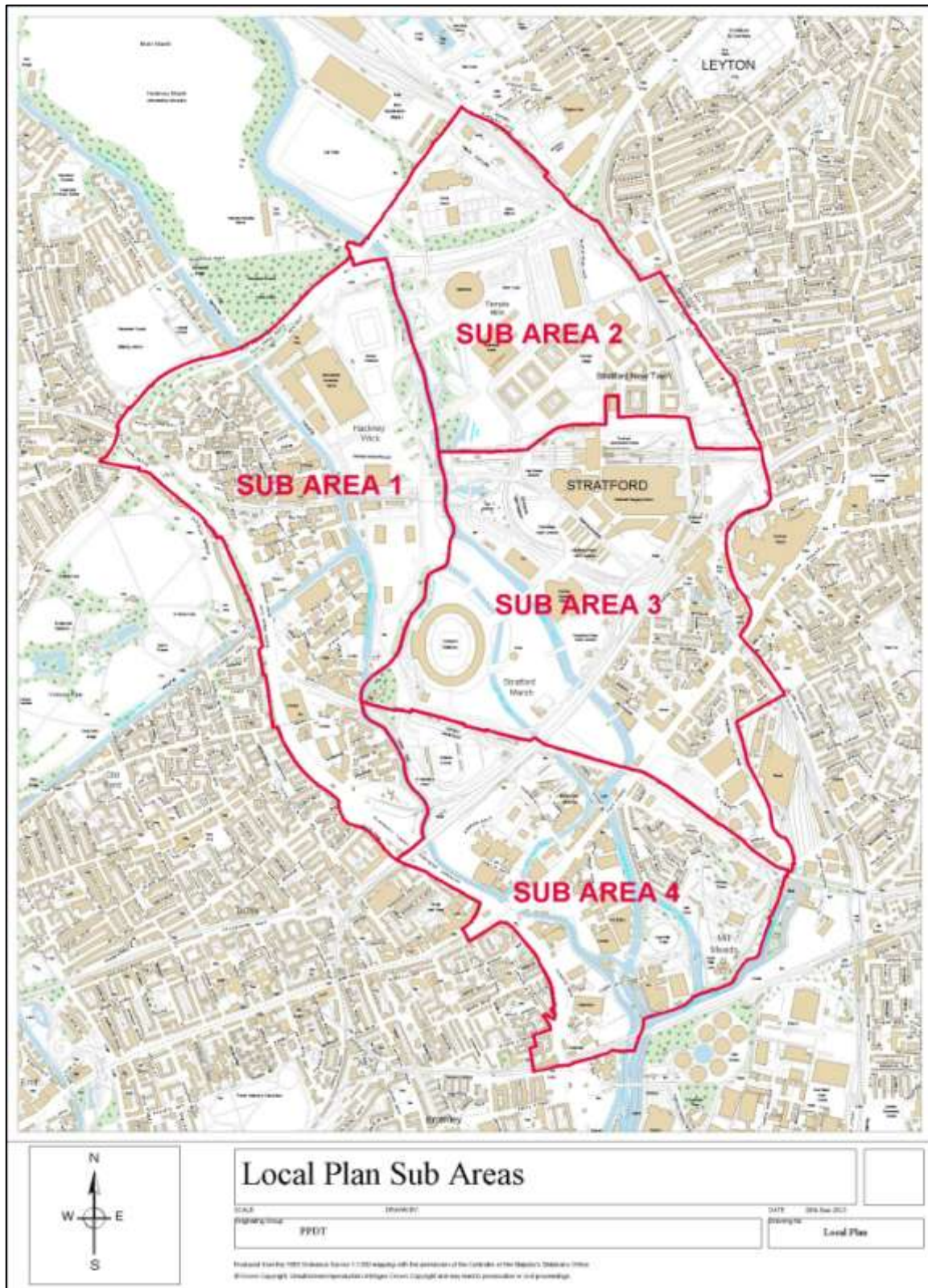
The understanding of **local identity** will be reflected in the **design** of new development whilst high standards in **energy efficiency** and **sustainable design and construction** are met. Important **views** will be protected; new **Conservation Areas** will be designated and local lists of **heritage** assets drawn together where necessary.

The natural environment will be cared for through safeguarding designated open space, maximising opportunities for **biodiversity** enhancement and healthy living through access and enhancement of the wealth of **open space, waterways** and **green infrastructure** available within the area. **Flood patterns, surface water drainage, contamination** and **air quality** issues are strong determinants of the suitability of development.

Infrastructure and Transport The Sub Areas

New **Strategic transport connections** with East London, London and beyond will enhance accessibility, bringing people and investment into the area. Development will make **local connectivity** and **transport improvements** and maximise pedestrian and cycling provision to create sustainable and liveable neighbourhoods. Appropriate **parking** provision will also meet aspirations of residents. New and improved local links will ensure that local people have better access to those transport links and the places providing employment, services and leisure opportunities.

The Sub Areas



Policies for **Sub Area 1 (Hackney Wick and Fish Island)** guide building heights and densities, connection enhancement, delivering new community facilities, tackling flood risk and facilitating a new heat network. The retention of buildings of heritage value and the setting of the Conservation Area are key to the success of the new neighbourhood centre at **Hackney Wick**. Site allocations are made for:

- 651 homes, primary school, playing fields, local amenities and community facilities at **Sweetwater**
- 887 homes, primary school, a canal side park, hub of employment and education use, with a supporting retail at **East Wick and iCity**
- retail, restaurants, drinking establishments and community facilities together with residential and office/light industry to the north and south of the railway line at **Hackney Wick**
- permanent designation of a Travellers site at **Chapman Road**

Sub Area 2 (North Stratford and Eton Manor) policies set out suitable housing typologies, densities and building heights as well as the means of improving connections and improvements to the public realm at Leyton Road. Site allocations are proposed for:

- Up to 1,100 new homes, local park, community facility and a minor retail or office uses at **Chobham Farm**
- Approximately 2,388 additional new homes retail and office uses under 1,000m² at **East Village**
- Up to 960 new homes, local park and a minor retail and office at **Chobham Manor**

Policies for **Sub Area 3 (Central Stratford and Southern Queen Elizabeth Park)** focus on the achieving Metropolitan Centre status at Stratford, provision of new cultural and leisure facilities, appropriate building heights and densities, protection of community uses and means of making connections across the area. Site allocations are made for:

- a full range of town centre uses appropriate in scale and form at **Stratford Town Centre Extension**
- leisure, office, education or residential in a form that reflects its location and access at **Chobham Farm South**
- a mixture of Retail , office and leisure and 1,705 homes at **Stratford Waterfront East with potential for significant education, institutional and or cultural uses to be introduced.**
- development, of up to 1,000 homes and subsidiary community, retail and leisure uses at **Stratford Waterfront East with potential for significant education, institutional and or cultural uses to be introduced.**
- Predominantly residential mixed use for comprehensive development or regeneration at **Greater Carpenters District**
- 300 homes and at least 1.1 ha of allotments at **Bridgewater Road**
- Secondary school and up to 550 homes at **Rick Roberts Way**

Policies for **Sub Area 4 (Pudding Mill, Bromley-by-Bow and Mills Meads)** focus on developing Bromley-By-Bow as a new District Centre, the appropriate scale of development, improving connections across the area, new community facilities, provision for the future

introduction of heat network and the protection and enhancement of the character and setting of the Conservation Area at Three Mills Island. Site allocations are proposed for:

- New district centre, primary school, local open space, library or community facility, up to 1200 new homes and new employment space at **Bromley-By-Bow**
- new and replacement business floorspace a new Local Centre, 1200-1500 homes, open space and public realm at **Pudding Mill**
- business space, local retail space, up to 1200 homes, open space and public realm at **Sugar House Lane**
- retention and development of cultural and creative industries and community uses at **Three Mills**



Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

Non-Technical Summary

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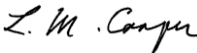
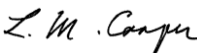


London Legacy Development Corporation

Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

Non-Technical Summary

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Report No	002-UA005031-UE31-01	
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This report has been prepared for the London Legacy Development Corporation in accordance with the terms and conditions of appointment for the Local Plan dated 13 September 2012. Hyder consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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ABBREVIATIONS

AAP	Area Action Plans
AQMAs	Air Quality Management Areas
LLDC	London Legacy Development Corporation
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SuDS	Sustainable Drainage Systems

1 INTRODUCTION AND BACKGROUND

The London Legacy Development Corporation (LLDC) has prepared a Local Plan to help guide development within the LLDC area up to 2031. The Local Plan will replace existing planning policy for the LLDC area which is currently covered by four adopted Core Strategies and associated Area Action Plans (AAPs) for the London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest.

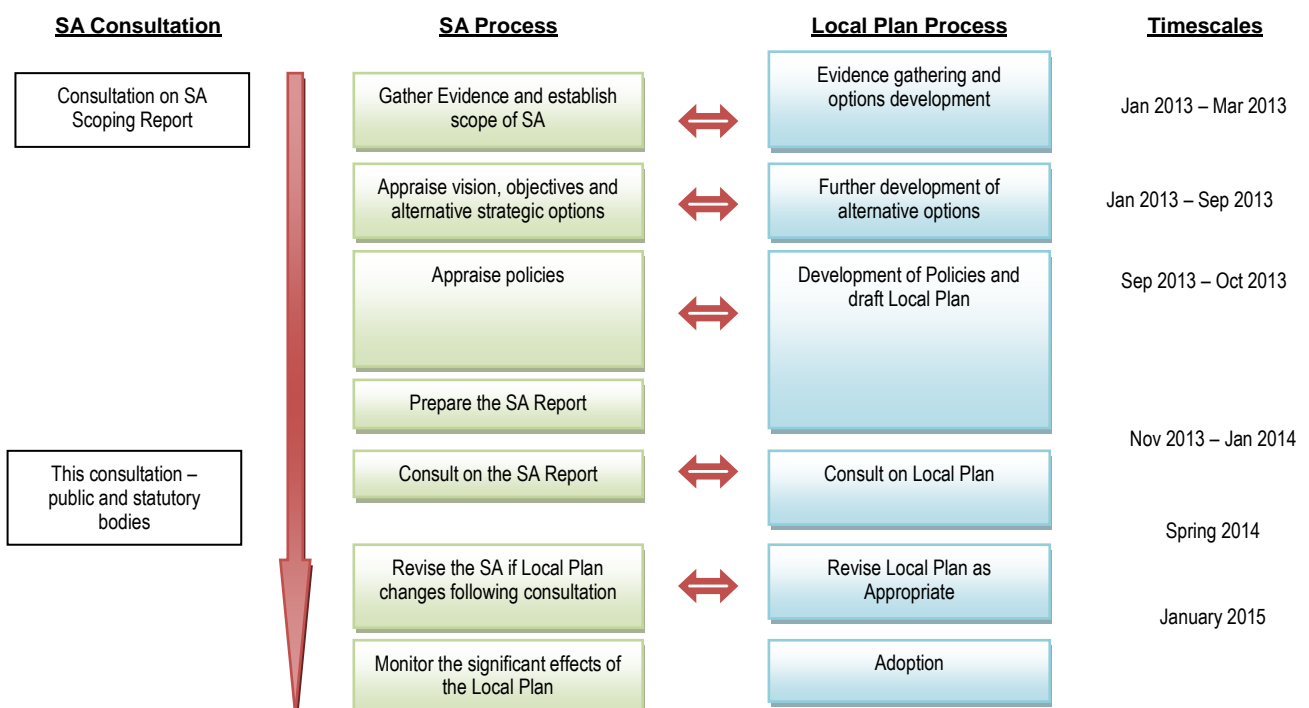
When preparing the Local Plan it is a legal requirement to undertake a Sustainability Appraisal (SA) to ensure that it is developed within the principles of sustainable development. Independent consultants Hyder Consulting Limited have undertaken the SA during the development of the Local Plan. This report provides a summary of the findings. The detailed reports can be viewed at the LLDC main office or on the website.

2 WHAT IS SUSTAINABILITY APPRAISAL?

SA is a process for assessing the social, economic and environmental impacts of a Development Plan Document as it develops and it aims to ensure that sustainable development is at the heart of the plan-making process. It is a legal requirement under planning law. The law states that the SA must comply with requirements of the European Strategic Environmental Assessment Directive.

Good practice guidance proposes a number of prescribed stages in the SA process, each of which links with stages of the plan-making process. It is important that the SA is able to feed into the plan-making process. This involves the ongoing appraisal of the plan and makes recommendations to help steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options. Consultation with statutory bodies (Natural England, English Heritage and Environment Agency) and the public is also required at key stages.

A high-level chart showing the SA stages undertaken alongside the plan-making stages is presented below. It also indicates the timeline and key consultation points.



3 Scope of the Appraisal

The scope of the SA was determined through collecting information on the environmental, social and economic characteristics of the LLDC area. This enabled key issues, opportunities and trends to be identified. A review of other relevant environmental protection objectives and policies was also undertaken. The scope of the appraisal was documented in a Scoping Report, issued for consultation with the statutory bodies in February 2013.

Existing characteristics and issues in the LLDC area

To ensure that a robust assessment of the Local Plan is undertaken, it is necessary to understand the existing conditions and characteristics of the LLDC area, for example, the location of key environmental features like designated historical sites, population dynamics including migration patterns, health, employment, schools capacity and the condition of housing stock and its affordability. These are detailed in the SA Report. Table 3-1 below identifies the sustainability topics covered in the SA and summarises some of the key characteristics and issues under each.

Table 3-1 Summary of key existing characteristics and issues in the LLDC area

SA Topic	Summary of key existing characteristics and issues in the LLDC area
Population	The high level of population growth anticipated within Hackney, Tower Hamlets, Newham and Waltham Forest are an indication why large numbers of new homes will be considered necessary within the boroughs. The 65+ group is projected to see the greatest increase in the next 25 years in the four boroughs therefore opportunities to provide appropriate housing for the elderly should be sought.
Education	There is a need to improve educational attainment across all four boroughs. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy. It should be ensured that any new residential development on the LLDC area does not put pressure on existing educational establishments.
Health	Health is generally poor when compared to the national average figures with regards to life expectancy from birth and incidences of diseases. The new developments may put pressure on existing health care facilities. Opportunities should be sought to encourage people to lead healthy lifestyles and participate in regular exercise.
Crime	Although the crime levels in the LLDC area are decreasing, there is a need to tackle anti-social behaviour across all four boroughs.
Water	The majority of rivers within the catchment are designated heavily modified and there is a distinct lack of natural river processes. The modification of rivers including in-stream structures has led to loss of habitat diversity and the creation of barriers for fish migration. Water quality also remains a significant issue. The highly urbanised nature exacerbates the pollution pressures particularly through increased surface water run-off, storm sewage overflows, alongside effluent from sewage treatment works. There are large areas within the area that are at risk of flooding from both the River Lee Navigation and the River Lee. There may be a risk of tidal flooding.
Soil and Land	Development on the LLDC area represents development on brownfield land and therefore a sustainable use of land resources. Any contaminated land encountered on the LLDC area prior to development should be remediated – which would offer benefits to soil and land resources.
Air Quality	Air Quality Management Areas (AQMAs) are designated in the four London boroughs, where the LLDC area is located, for exceedences in both particulate matter (PM ₁₀) and nitrogen dioxide (NO ₂).

SA Topic	Summary of key existing characteristics and issues in the LLDC area
Biodiversity	There are no nationally or internationally important ecological sites within the LLDC area. However, opportunities should be sought to maximise accessibility to nature and to consider Biodiversity Action Plan commitments.
Cultural Heritage	The LLDC area contains a large number of historic assets including such of national importance. The LLDC area located within Newham is considered to be within an archaeological priority area. Cultural heritage features should be conserved and enhanced.
Landscape/Townscape	There are no designated landscape assets within 20km of the LLDC area. However, it is essential that townscape character and quality is maintained / enhanced through high quality design, careful siting, and the incorporation of soft landscaping.
Minerals and Waste	Recycling rates saw an overall increase in all four boroughs from 2001-2011. Opportunities should be sought to enhance reuse, recycling and composting performance.
Transport	The LLDC area is well connected strategically by transport infrastructure and public transport links, making the area relatively accessible. Strategic infrastructure is established and has been previously enhanced to support the Olympic Games, with the minor exception of routes north of Stratford towards Waltham Forest. Opportunities should be sought to reduce reliance on the private car to reduce current local issues with congestion and air quality.
Economy	Levels of economic inactivity within all four boroughs are lower than regional and national levels. There are opportunities to increase employment opportunities through employment hubs and Stratford City in its role as a sub-regional centre. The good transport links to the LLDC area should be exploited as accessibility is a key issue when attracting new residents / inward investment / creating employment opportunities.
Deprivation	There are a number of wards within the four boroughs that are considered to be in the bottom 20% most deprived nationally. Enhancements on the LLDC area that deliver employment opportunities, high quality new housing, improved public realm, access to nature would all benefit deprivation.
Housing	House price inflation alongside the recent recession has impacted significantly on housing affordability across London. Overcrowding is a key problem in Hackney with 10% of households being officially overcrowded. With the projected increase in population and a large projected increase in the 65+ age group in Hackney, Tower Hamlets, Newham and Waltham Forest, there will be a need for appropriate housing for the elderly.

Policy context

A review of other international, national, regional and local plans and environmental protection objectives that could influence the development of the SA and the Local Plan was undertaken and is recorded in the SA Report. The review of these documents focussed upon identifying key environmental and sustainability objectives that would need to be considered in the SA and the Local Plan.

Which aspects of the Local Plan were appraised?

The following aspects of the Local Plan were appraised through the SA:

- Vision and Objectives
- Strategic Policies and Detailed Policies
- Sub Areas Policies and Site Allocations

Following the appraisal of the above, recommendations were presented to the plan-makers to adapt the choice of strategy or policy wording in order to minimise adverse effects and maximise benefits.

4 ALTERNATIVE OPTIONS APPRAISAL

Vision, Objectives and Policies

The development of the Local Plan considered options relating to the Vision, Objectives, and policies of the Local Plan. The preferred options and alternatives were assessed against the SA Objectives and recommendations for further development were provided. In many cases, no alternatives were considered as this would result in a policy approach that would not be in general conformity with the London Plan or with other high tier planning documents.

On the whole, the preferred options provide a balanced approach between housing and economic growth in the LLDC area through a number of relevant policies. As a result the preferred options will provide both housing benefits for the growing population of the area (including affordable housing) and employment and investment opportunities to tackle some deprivation issues. The preferred options also performed very well against SA objectives relating to health, sustainable access and biodiversity.

Sub areas

Alternative options were also considered with regards to the identified four Sub Areas in the Local Plan and a number of Site allocations within these Sub Areas. It was recognised that certain limitations exist for considering more alternatives with regards to the proposed Sub Areas and Site Allocations as planning permissions have already been granted for the majority of sites. Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

Sub Area 1

The only alternative option within the Sub Area 1 policies is related to Policy SA1.4 Heritage-led Regeneration where an alternative option would be to encourage purely residential or employment-led regeneration. It was considered more appropriate that no one use should predominate in the Sub Area in accordance with other policies in the Local Plan. The preferred option performs particularly well against the SA objectives relating to the enhancement of townscape quality and protection of cultural heritage.

Sub Area 2

Given the high level of certainty of delivery of the permitted development in the area no realistic alternative options were available for consideration. The permitted schemes are outline parameters based applications that set the limit of development extent and height, allowing sufficient flexibility in the final form for it.

Sub Area 3

An alternative option for the Sub Area 3 Vision was not to propose the extension of the existing town centre which would encompass the retail, leisure and commercial district of Westfield Stratford. It was discounted as this would weaken the case for Stratford as a whole being defined as a Metropolitan Centre within the London Plan. The sustainability appraisal showed that the alternative option is less likely to contribute to the economic objectives because it offers fewer employment and retail opportunities within the LLDC area.

Promoting only residential and subsidiary uses within the Sub Area was an alternative option for policy SA3.2 Cultural and Education facilities. The alternative was discounted as it was considered that it would not reflect the overall vision and strategy set out within the Local Plan and would not maximise the economic growth element of the plan. The preferred option will contribute to the achievement of a number of SA objectives as it is likely to result in positive effects with regards to health, education, and overall deprivation levels.

An alternative option of not permitting interim uses of land (SA3.3: Interim Leisure, Cultural and Event Uses) has been discounted as this will risk the land being unutilised and provide a poor quality environment along key routes in the area. The alternative option may result in some negative effects with regards to the economic SA objectives as the land would be underutilised and is likely to create an unattractive business environment prior to the delivery of later phases of permanent development.

Sub Area 4

No specific alternatives were considered with regards to the Sub Area policies as these were explored and discounted through the Core Strategy preparation process in line with consultation responses, evidence and sustainability appraisal. The Legacy Corporation's vision for Sub Area 4 updates this already established approach.

Site Allocations

The following alternatives were considered and rejected with regards to the Site Allocations in the LLDC area:

- Chobham Farm South: The alternative option of allocating the site for development without the completion of a link to the town centre bridge was rejected as this link will help to improve access and the range of options for acceptable forms of development. The preferred option will result in benefits related to sustainable access to amenities. The alternative option is less likely to contribute to the achievement of the economic SA objectives because it provides limited opportunities for development of the site thus attracting less investment in the area. Moreover, it may result in worsening of the deprivation levels due to restricted access to amenities.
- Stratford Waterfront East: The option of only reflecting the approved form of development in this location, with no additional flexibility was discounted as the provision of greater flexibility provides an opportunity for accommodating specific significant proposals within the final form of development that could contribute to the wider economic and culturally significant role of this location. Positive effects were identified with regards to health and housing supply. In addition, the preferred option is more likely to contribute to the achievement of the economic SA objectives through the flexible option to introduce conference centre, institutional or educational uses on the site.
- Rick Roberts Way: The alternative of only reflecting the Legacy Communities Scheme permitted floorspace scenario was discounted as the identification of the Gas Holder site opens the potential for a wider and more comprehensive development scenario. The preferred option performs well against objectives related to an improved education attainment, health benefits and housing supply. In addition, some positive effects on biodiversity are likely to occur through the remediation of contaminated land in the south section of the area. The Alternative Option will result in similar effects as the Preferred Option with unknown performance against the biodiversity SA objective.

'No Plan' / 'Business as Usual' Option

An option representing a 'No Plan' / 'Business as Usual' approach was also subject to the SA process as the comparison of options to a 'No Plan' / 'Business as Usual' situation is a

requirement of the SEA Directive and some of the suggested alternative options include 'no policy' alternative.

In the absence of the Local Plan (and more detailed specific policies) the following effects are likely to occur:

- A greater uncertainty over the exact form of new development.
- A greater likelihood of development being less sustainable and of adverse environmental, social or economic effects occurring.
- A lower likelihood of opportunities being met in order to solve the area's existing social and economic issues. By not implementing the Local Plan, there is a greater likelihood of the district's negative trends continuing in the future.
- The planning and consenting process would be slower as decisions would need to rely upon a wider range of policy and guidance where it is available.

5 APPRAISAL RESULTS

5.1 The Vision and Objectives

There is an emphasis within the Vision to create 'a series of well-connected neighbourhoods' that 'bring economic growth, new jobs and new homes' which would positively fulfil many of the social and economic SA Objectives, as creating such a place would improve local housing, encourage economic growth and increase employment opportunities. This would be particularly beneficial for surrounding areas which currently suffer with elevated levels of deprivation. Levels of deprivation would further benefit from provision of high quality education opportunities and facilities, from early years to higher education and research within the LLDC area. However, the Vision does not specifically mention that affordable housing will form part of new residential development which has been identified as a specific need in the area.

Climate change would also benefit under the Vision through promoting adjacency of homes and jobs along with a commitment to maximise connectivity of the LLDC area with surrounding areas through sustainable transport links. This may also encourage a model shift encouraging people to leave their private cars at home and opt for a more sustainable travel choice i.e. walking, cycling or taking the train to access the LLDC area.

With regards to the environment the Vision seeks to ensure that the LLDC area provides a well-designed built environment that is readily accessible and provides areas of open space. However, it does not explicitly mention the need to protect and enhance the natural environment such as watercourses, wildlife sites (or local wildlife) and other Green Infrastructure. In addition the Vision does not specifically mention the need to protect the historic environment (including heritage assets), a need to protect and enhance townscape character and quality (although this is indirectly inferred to) or protect and enhance the quality of water features and resources.

The Local Plan contains 14 Objectives to deliver the Vision. The primary focus of these objectives is the delivery of sustainable communities, the economy and the environment, and contains clear provisions to ensure sustainable construction and good transport connectivity. The objectives collectively therefore are considered to be sustainable. However, it was recommended that there should be a clear commitment that business growth and new housing development minimises the use of natural resource use and maximises opportunities to reduce waste production.

5.2 The Policies of the Local Plan

The policies of the Local Plan are designed to guide development in the LLDC area. On the whole the majority of policies contribute to the achievement of the SA Objectives. However, a number of policies were identified to detract from the SA Objectives with potential to have a negative effect if no mitigation measures are put in place.

The policies relating to Business, Economy and Employment perform very well against the sustainability criteria used in the appraisal and would lead to both direct and indirect benefits. Direct benefits would occur in relation to improved employment opportunities, economic inclusion, long-term economic benefits and an improved education attainment for all age groups. Other indirect benefits will occur as a result of the creation of improved public realms attracting more visitors, residents and businesses, which could indirectly benefit crime and health, and also reduction in carbon emissions in the long-term through the promotion of mixed use developments. Indirect benefits in terms of greenhouse gas emissions and air quality could also be realised through the implementation of travel plans for new schools and by focussing new leisure facilities in locations where public transport is available.

The housing policies directly seek to ensure the provision of a range of housing types including affordable housing, ensuring both market and affordable housing needs are met, which could indirectly encourage inward investment and economic growth. Many of the policies seek to ensure access to services including by public transport. It is ensured that the needs of specific sectors of the community such as older people and students are met, which could provide indirect benefits for their health and well-being.

The built environment policies positively support many of the environmental sustainability criteria, particularly through the requirement for the sustainable design construction of new developments, maximising energy efficiency, and utilising low carbon technologies. The policies therefore directly seek to reduce carbon emissions and ensure adaptation to climate change, and indirectly contribute to a reduction in the use of natural resources and waste generation. The policies also seek to ensure that new development is well connected to other amenities and facilities, is well integrated with the existing townscape, and does not have adverse impacts on (and where possible improves) the quality of the built and natural environment. Such provisions can offer a number of social and economic benefits, for example relating to accessible jobs and encouraging inward investment. In addition, encouraging the use of public transport, walking and cycling are also beneficial by providing opportunities for individuals to pursue healthy lifestyles.

The historic environment related policies clearly provide for significant protection of the area's heritage assets and their settings, which can also benefit townscape character. The preservation of heritage assets can also encourage additional residents, employees and tourists, and act as an important learning resource.

The policy seeking to protect community infrastructure and services ensures that facilities and infrastructure are available to cope with the demand that new development will generate, water, waste and energy infrastructure could all help contribute to the long-term sustainability of the LLDC area. The energy enhancing policy contributes positively to the sustainability criteria used in the appraisal through the promotion renewable energy generation, which could generate indirect benefits to the local economy.

The policies relating to integrated water management focus upon protecting the area's water resources, and ensuring that flood risk is effectively managed as part of the development process. The protection of water quality is particularly important as there are a number of rivers across the LLDC area (Waterworks River, River Lee, River Roding) and there are flood risk

issues associated with some localised areas that fall within Flood Zone 2 and 3. Flooding can have significant adverse effects on the economy and human health and wellbeing by affecting homes, buildings and services, and resulting in significant remedial costs. These policies would therefore indirectly benefit the local economy by reducing the risk of flooding pressure on the district's economy and services.

The policies relating to green infrastructure seek to ensure the existing green infrastructure network of the area is protected, which would indirectly benefit health and wellbeing. There is also potential for green spaces such as allotments to be used to promote healthy lifestyles and eating. In addition, green infrastructure can be important green travel links (cycle routes) and enhancing these links across the LLDC area could help contribute to greater levels of walking and cycling which would have air quality, climate change as well as health benefits in the long-term. Positive environmental impacts upon water resources, soil resources, biodiversity and townscape should also occur if the policies were implemented.

The policies relating to the connectivity across the LLDC area positively contribute a number of sustainability criteria (e.g. health, access, economy, air quality) by ensuring local services are located in areas where there is a choice of travel options (walking, cycling and public transport) and are accessible to all. Whilst the focus of this policy is not upon environmental issues, by ensuring that new services are well located in relation to existing centres, it may help to reduce the number of journeys made by car which could indirectly benefit air quality (although this depends upon the travel choices of individuals). Sustainable transport links would also improve access to existing services and facilities, and would encourage economic development and inclusion.

5.3 The Sub Areas and Site Allocations

All four Sub Areas will have a positive contribution to meeting housing demands with planned housing growth of approximately 20 000 new residential units within the plan period. Along with the allocation of land for residential use, there is a significant floorspace allocated for employment and office use which will result in direct benefits in relation to improved employment opportunities, economic inclusion, and business development. Sub Area 3 provides the greatest opportunities to achieve the SA objectives relating to reduction of poverty and economic growth with the promotion of education and research facilities and the provision of retail and office space.

Positive effects are identified with regards to enhancement of biodiversity and remediation of contaminated land in Sub Area 3 and 4. Although the four Sub Areas are already well-served by public transport, further transport infrastructure improvements will have a positive direct effect on access and connectivity across the LLDC area. Crime levels may increase with the influx of significant number of new residents in the short term; however the potential negative effects are likely to be reduced in the long term as increased employment opportunities will lead to improved living standard, with a positive effect on deprivation rates and reduction of crime.

The Sub Areas will also slightly improve overall levels of deprivation though providing new affordable decent housing, new essential facilities which are accessible via walking / cycling and the provision of some commercial / employment opportunities. The Olympic Stadium located in Sub Area 3 will provide a wide range of facilities which may encourage more sport activities thus reducing health inequalities. Further infrastructure improvements of roads, tube stations and bridges will improve the access of the expanding resident population to public transport. These opportunities will offer benefits to those from more deprived communities in the area. Townscape quality and local character will be protected through the implementation of policies relating to the height and density of new buildings and specific heritage-led regeneration policies.

Twenty site allocations were identified in the Local Plan and assessed against the SA objectives. On the whole, the majority of site allocations performed very well against housing and health objectives through the provision of a significant number of new homes and facilities to encourage healthy lifestyles. Positive effects are identified with regards to improvement of educational attainment in five site allocations through the provision of secondary school, library, and conservation of historical assets. At present there is uncertainty whether the potential to develop Chobham Farm South, Stratford Waterfront East, and Stratford Waterfront West with regards to education and research will be realised. Sustainable access and connectivity will be improved at half of the proposed sites which may result in further investment and economic benefits in these locations. However, there is limited information provided with regards to access issues for the rest of the sites with some uncertain/unknown potential effects against the SA objectives. Positive effects with regards to business and employment opportunities are identified at ten site allocations mostly through the provision of employment/office/retail floorspace, new hotel, and a new District Centre.

Negative effects are primarily related with the close proximity of some sites in Sub Area 3 to water courses, with potential risks for flooding.

5.4 Cumulative Effects

The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).

The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. The LLDC Local Plan has been assessed for its individual impacts but there may be cumulative effects which could occur as a result of the policies being implemented. Potential positive cumulative effects include the following:

- Provision of better quality homes and diversity of housing types which will contribute to the long-term housing needs of the area.
- Increased business and employment opportunities.
- Improvement in educational attainment levels
- Improvement in health.
- Improvement in access to and provision of services and facilities.
- Provision of suitable open areas for recreation.
- Improvement of public realm through open spaces provision and regeneration.

However, potential adverse cumulative effects can result from growth and development contained in policies, which include:

- Increase in use of resources from water and energy consumption.
- Loss of habitats through landtake.
- Increase in landfill waste.
- Increase in road traffic in major roads and worsening of air quality from traffic generation and dust from construction activities.

5.4.1 Further SA Recommendations

It is recommended that the Vision and Objectives are amended to ensure the following:

- The Vision could be strengthened to ensure it includes a commitment to ensuring an element of affordable housing is provided within the LLDC area i.e. 'provide a focus for development that will bring economic growth, new jobs and new homes (*including an element of affordable homes*) in a well-designed built environment'. However, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.
- There should also be a clear commitment within the Vision to the protection and enhancement of biodiversity resources, heritage assets and townscape character and quality. However, as above, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.

It is recommended that the Policies are amended to ensure the following:

- Within the housing policies there is no clear commitment to ensuring Sustainable Drainage Systems (SuDS) are incorporated into new development to ensure flood risk within the LLDC area is not exacerbated nor is there specific reference to minimising the use of water resources. It is therefore recommended that these elements are incorporated into the policies.
- Safety by design principles should also be incorporated into the housing policies to ensure that crime levels do not increase as a result of the planned growth of the area and the influx of a significant number of new residents.
- It would be beneficial if the water management policy is more explicit about the main use of the waterways as that will determine the potential effects on biodiversity throughout the plan period.
- Renewable energy infrastructure should be more explicitly promoted where appropriate to mitigate the effect of increased energy demand related to the planned level of growth.
- The LLDC area is largely located within an Area of Archaeological Importance. Therefore it is likely that major infrastructure works will have an adverse effect on archaeological resources. Detailed impact assessment of Cultural heritage assets may be required before any construction works commence.
- The Local plan includes a policy which ensures that there is no loss of any waste management facilities but does not include measures to reduce waste sent to landfill. Currently a high percentage of the waste in the area goes to landfill and landfill waste is a large source of anthropogenic methane. Reuse, recycle or compost of materials should be encouraged.

It is recommended that the Sub Areas are amended to ensure the following:

- Increased energy demand from new developments may result in adverse effects caused by increase of greenhouse emissions. Achieving high levels (5 or 6) of the Code for Sustainable Homes would serve to minimise any increase in carbon emissions associated with new development.
- Although the LLDC area is considered to be very urban with few areas that provide valuable spaces for wildlife, the wetlands and rivers that cross the area provide habitat for

species and where expanding neighbourhoods result in loss of habitat from landtake compensation measures should be sought.

- The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. Reuse/recycle of materials must be sought where possible. Opportunities should be sought to reuse any vacant dwellings.
- Additional information or reference to the relevant policy in the plan would provide more clarity on how the Sub Area / Site Allocation will contribute to the achievement of the SA objectives.

6 MONITORING

Monitoring is an ongoing process, integral to the implementation of the Local Plan and a requirement of the SA process. The proposed monitoring framework was designed to focus mainly on significant sustainability effects identified during the SA, including effects:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

A monitoring framework is presented in the SA Report which identifies the factors that should be monitored, by whom and when. It also identifies how remedial action should be taken if unforeseen effects occur. Monitoring should occur throughout the lifetime of the Local Plan.

7 NEXT STEPS

This Draft SA Report will be issued for consultation alongside the Local Plan to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, LLDC will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Local Plan being adopted.

The Local Plan and the SA Report may be viewed at the address below:

London Legacy Development Corporation

Level 10, 1 Stratford Place

Montfichet Road

Olympic Park

London

E20 1EJ

Alternatively they can be viewed at LLDC's website: **TBC**



Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

SA Report

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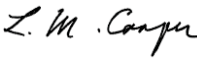
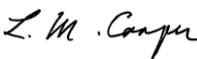


London Legacy Development Corporation

Strategic Environmental Assessment and Sustainability Appraisal

Local Plan

SA Report

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Report No	002-UA005031-UE31-01	
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This report has been prepared for the London Legacy Development Corporation in accordance with the terms and conditions of appointment for the Local Plan dated 13 September 2012. Hyder consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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Alternative Options Policies and Sub Areas

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Policy Options Sustainability Appraisal

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Sustainability Appraisal Matrices Policies

Appendix G

Sustainability Appraisal Matrices Sub Areas and Site Allocations

ABBREVIATIONS

AAP	Area Action Plans
AMR	Annual Monitoring Report
AONBs	Area of Outstanding Natural Beauty
APS	Annual Population Survey
AQMAs	Air Quality Management Areas
BAP	Biodiversity Action Plan
GVA	Gross Value Added
HRA	Habitats Regulations Assessment
LLDC	London Legacy Development Corporation
LNR	Local Nature Reserves
LSOA	Lower Super Output Area
MOL	Metropolitan Open Land
NEETs	Not in education, employment, or training
NNR	National Nature Reserves
NPPF	National Planning Policy Framework
NVQ	National Vocational Qualification
PAS	Planning Advisory Service
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SINC	Sites of Importance for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific interest
SuDS	Sustainable Drainage Systems

1 INTRODUCTION

The London Legacy Development Corporation (LLDC) is currently in the process of preparing its Local Plan. The Local Plan will eventually replace existing planning policy for the LLDC area (shown on Figure 1-1) which is currently covered by four adopted Core Strategies and associated Area Action Plans (AAPs) for the London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest.

As part of the preparation process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is being undertaken. The term SA shall be used to refer to the combined SA/SEA for the remainder of this report. This report presents the process and findings of the SA of the emerging Local Plan.

1.1 Background to and Purpose of the Local Plan

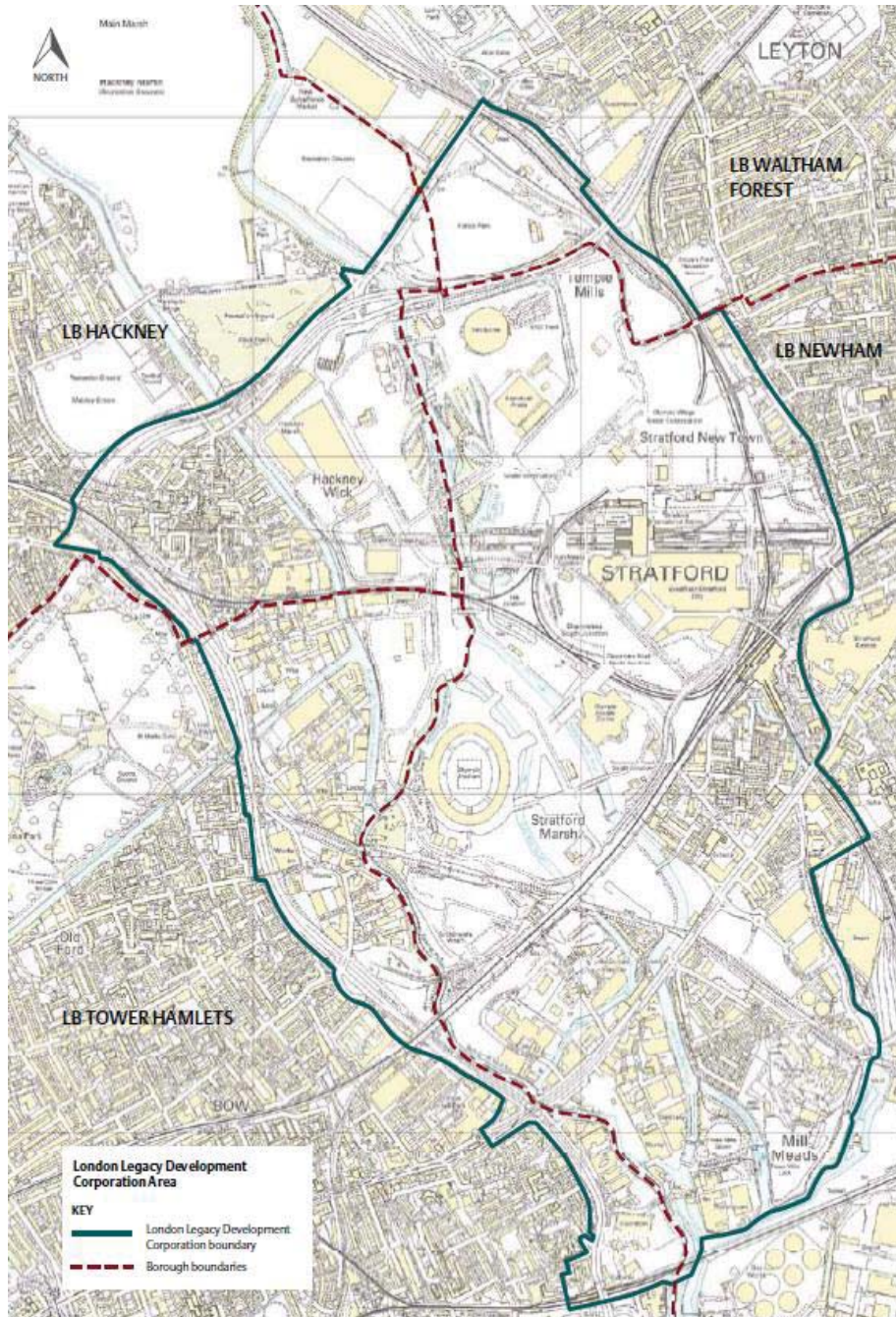
On 1 October 2012, the LLDC Planning Functions Order came into force giving the LLDC the full range of planning functions that would normally be available to a local planning authority, including plan making powers. The LLDC is the planning authority for the Mayor's development corporation in east London which includes the Queen Elizabeth Olympic Park. The precise area affected ('the Legacy Corporation planning boundary') includes parts of the London Boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest and its location is presented on Figure 1-1.

The LLDC plans a £300m construction project to transform the Olympic site into the Queen Elizabeth Olympic Park. Legacy plans for the Queen Elizabeth Olympic Park include:

- Venues and Sport - the future of six of the eight permanent venues has already been secured (Aquatics Centre, Orbit, Multi-Use Arena, Olympic Village, Velodrome, Eton Manor);
- Employment - up to 8,000 permanent jobs on the park by 2030 plus 2,500 temporary construction jobs along with training and apprenticeships with a focus on opportunities for local people;
- New Neighborhoods - Five new neighborhoods developed over 20 years;
- Transport - anticipated to be the most accessible and connected place in Europe;
- Visitor Attraction – anticipated to become one of London's top 10 visitor destinations by 2020 attracting local, regional, national and international visitors; and
- Green Space - Over 22 miles of interlinking pathways, waterways and cycle paths and 111 acres (45 hectares) of biodiverse wildlife habitat on the Olympic Park, including reedbeds, grasslands, ponds and woodlands, with 525 bird boxes and 150 bat boxes.

The development plan for the LLDC area currently comprises the London Plan and the Local Development Documents of the constituent London boroughs of Newham, Hackney, Waltham Forest and Tower Hamlets. Until the Legacy Corporation has prepared planning policy for the new local planning authority area, planning applications will be determined in accordance with the existing development plan. Therefore, the emerging Local Plan will eventually provide the planning policy framework to deliver the vision, goals and aspirations for the LLDC area. The Local Plan together with the London Plan will guide development within the LLDC area and will be used in the determination of future planning applications. The LLDC area is presented on Figure 1-1.

Figure 1-1 Location of the LLDC Area



The Local Plan includes the following key elements:

- An outline of the key issues facing the area i.e. a 'spatial portrait'.
- A vision for how the area should look in 2031, with strategic level supporting objectives.
- The strategic direction of future growth in the area, including the identification of strategic sub areas and sites which are key to the delivery of the vision, and a suite of place-based policies which will describe how sub areas will be expected to change over time.
- A set of issues-based policies which will be used in the determination of planning applications, covering issues such as housing, business, economy and employment, infrastructure, natural environment, historic and built environment, and transport requirements.

- A delivery and implementation strategy which covers planning obligations and community infrastructure levy as well as compulsory purchase powers.

The preparation of the LLDC Local Plan commenced in 2012 and an initial consultation on ‘what the Local Plan should cover’ ran between Monday 12th November and Monday 12th December 2012. Representations received from stakeholders and the public alike were considered when drafting the Local Plan and the corresponding SA Report.

Table 2-1 presents an indicative programme for the emerging LLDC Local Plan and future consultation dates.

Table 1-1 Indicative Programme for the LLDC Local Plan

Stage / Element of the Local Plan	Date
Nov – Dec 2012	Consultation on what the Local Plan should cover
Jan – March 2013	Consultation on the SA Scoping Report
Jan – September 2013	Development of draft policies, proposals and designations that will form the Local Plan taking views and information provided into account
November 2013 – January 2014	Informal consultation on the draft Local Plan and the draft SA
Spring 2014	Formal publication and consultation period for the Local Plan
Summer 2014	Independent examination of Local Plan by a planning inspector
January 2015	Formal adoption of the Local Plan

1.2 Background to and Purpose of the SA Report

SA (incorporating the requirements of the SEA Directive¹) has been undertaken on the Local Plan throughout its development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Local Plan and that it broadly complies with the relevant planning guidance. The overarching aim of the process is to contribute to better decision-making and planning. SA is an iterative process and follows a series of prescribed stages as set out in Section 2.2 in which the elements of the Local Plan are appraised against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the development that is brought forward.

This SA Report provides a summary of the SA process so far and presents the findings and recommendations of the assessment of the Local Plan. The key aims are to:

- Provide information on the Local Plan and the SA process;
- Present the key existing social, economic and environmental conditions within the LLDC area, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;
- Identify, describe and evaluate the likely significant effects of the Local Plan;
- Recommend measures to avoid, reduce or offset any potentially significant adverse effects; and

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

- Propose a monitoring framework that can be used to monitor the identified significant effects.

It is essential that the Local Plan is read in conjunction with this SA Report.

1.3 Structure of this SA Report

Table 1-2 provides an outline of the contents and structure of this SA Report.

Table 1-2 Contents and Structure of this SA Report

Section of SA Report	Outline Content
Non-Technical Summary (separate document)	Summary of the SA process and SA Report in plain English (a legislative requirement).
Abbreviations	Abbreviations used in this report.
1: Introduction	Provides the background to, purpose of, and structure of the Local Plan and this SA Report. It also introduces the concept and application of the Habitats Regulations Assessment (HRA) process.
2: Sustainability Appraisal	This section outlines the legal requirements for the SA. It outlines the key elements of the SA process and the approach adopted for appraising the effects of the Local Plan (including the SA Framework), together with an overview of the consultation requirements.
3: The Local Plan Alternatives	Outlines the development of alternative options that were considered and appraised as part of the development of the Local Plan.
4: Appraisal of the Local Plan	Presents the full appraisal of the Local Plan against the SA Framework including cumulative effects.
5: Monitoring Framework	Provides an outline of the proposed monitoring framework.
6: Next Steps	Identifies the next steps in the SA process, following consultation on this SA Report. Details of how to comment upon this SA Report are also provided.
Appendix A	Presents the full analysis of relevant Plans, Programmes and Environmental Protection Objectives and their relationship/conflicts with the Local Plan.
Appendix B	Contains the baseline data, a summary of which is presented in Chapter 2.
Appendix C	Vision and Objectives Options Appraisal
Appendix D	Alternative Options Policies and Sub Areas
Appendix E	Policy Options Appraisal
Appendix F	Sustainability Appraisal Matrices Policies
Appendix G	Sustainability Appraisal Matrices Sub Areas and Site Allocations

1.4 Habitats Regulations Assessment

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon a Natura 2000 site (Special Area of Conservation (SAC), candidate Special Area of Conservation (cSAC), Special Protection Area (SPA), potential Special Protection Area (pSPA) and Ramsar site), which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. The

overarching process is referred to as HRA. A HRA screening exercise is therefore being undertaken in tandem with this SA to determine if the Local Plan (either in isolation and/or in combination with other plans or projects) would generate an adverse impact upon the integrity of a Natura 2000 site, in terms of its conservation objectives and qualifying interests. This process is documented in a Screening Report that will be submitted to Natural England.

2 SUSTAINABILITY APPRAISAL

2.1 Legal Requirements

It is a legal requirement that the LLDC Local Plan is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive which was transposed directly into UK law through the SEA Regulations².

The aim of the SEA is to *'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1 of the SEA Directive).

A combined SA and SEA has been undertaken, as the Local Plan has the potential to have a range of significant sustainability effects (both positive and negative). The SA has been undertaken in accordance with guidance from the Planning Advisory Service (<http://www.pas.gov.uk/pas/core/page.do?pageId=152450>). In addition, published Government guidance on SEA³ (hereafter referred to as the Practical Guide) has also been followed.

2.2 Stages in the SA Process

Although there are formalised approaches for both SA and SEA, only the latter has a legal obligation to perform certain activities as stipulated in the SEA Directive. These legal obligations have been adhered to throughout the SA process by following a series of prescribed stages, through which the elements of the Local Plan have been appraised using Sustainability Objectives (Table 2-1 provides further detail).

Table 2-1 presents a summary of the key stages of the SA process, together with the SEA Directive requirements for each stage. Reference is given to where the requirements have been addressed within this SA Report.

Table 2-1 Stages in the SA Process and SEA Directive Requirements

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Local Plan
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope			
A1: Identifying other relevant policies, plans and programmes and sustainability objectives	The Environment Report should provide information on: <i>"the relationship (of the plan or programme) with other relevant plans and programmes"</i> (Annex 1(a)) <i>"the environmental protection objectives, established at international (European) Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation"</i> (Annex 1(e))	Chapter 2 and Appendix A.	Stage A corresponds to the scoping stage of the SA and the findings of this stage are presented in the Scoping Report that was consulted upon in February / March 2013. During this stage the scope of the SA for the Local Plan was

² S.I. 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations, 2004

³ ODPM *et al.* (2005) *A Practical Guide to the Strategic Environmental Assessment Directive*

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Local Plan
A2: Collecting baseline information	The Environment Report should provide information on: <i>“relevant aspects of the current state of the environment and the likely evolution thereof without its implementation of the plan or programme”</i> and, <i>“the environmental characteristics of the areas likely to be significantly affected”</i> (Annex 1(b), (c)) <i>“any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”</i> (Annex 1 (c))	Chapter 2 and Appendix B	defined.
A3: Identifying sustainability issues and problems		Chapter 2	
A4: Developing the SA Framework	N/A	Chapter 2	
A5: Consulting on the scope of the SA	<i>The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report. (Article 5.4)</i>	The scope of the appraisal is presented in Chapter 2. A Scoping Report was produced and consulted upon.	
Stage B: Developing and Refining Options and Assessing Effects			
B1: Testing the Local Plan’s objectives against the SA Framework	The Environment Report should consider <i>“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”</i> and give <i>“an outline of the reasons for selecting the alternatives dealt with”</i> (Article 5.1 and Annex I(h))	Chapter 3 and Appendix C.	Stage B of the SEA process is linked to the overall production of the Local Plan which includes the development of the strategic plan policies and sub area policies and site allocations options and the finalisation of the preferred options. There has been a degree of interaction between the plan-making and SA teams during this stage in the process. This has enabled potential adverse effects of the Local Plan to be avoided/minimised and potential sustainability benefits maximised.
B2: Developing the Local Plan Options	In the Environmental Report, <i>“the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated”</i> (Article 5.1)		
B3: Predicting the effects of the Local Plan			
B4: Evaluating the effects of the Local Plan			
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	Annex I (g) states that it should also include <i>“measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme...”</i>		
B6: Proposing measures to monitor the significant effects	<i>The Environmental Report should provide information on “a description of the measures envisaged concerning monitoring”</i> (Annex I (i))		

SA Stage	Key SEA Directive Requirements	Relevant Section of the SA Report	Application to the Local Plan
of implementing the Local Plan			
Stage C: Preparing the SA Report			
C1: Preparing the SA Report	Article 5.1 contains the requirement for an environmental report to be produced where an assessment is required. The environmental report “ <i>shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication..</i> ” (Article 5.2). Details of the information to be given in the Environmental Report are provided in Annex 1.	This SA Report represents the required Stage C output.	This SA Report has been produced in line with the requirements of the SEA Directive for producing an Environmental Report. A Non-Technical Summary is also provided.
Stage D: Consultation on the Local Plan and the SA Report			
D1: Public participation on the proposed submission documents	Article 6 contains the requirements for the draft plan or programme and the environmental report to be made available to statutory authorities and the public. They should be given an ‘ <i>early and effective opportunity within time frames to express their opinions</i> ’ (Article 6.2).	Arrangements for consultation are indicated in Chapter 6.	The SA Report and the Local Plan will be consulted upon in accordance with Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
D2: Appraising significant changes resulting from representations	N/A	N/A	Following the receipt of representations, the SA Report may need to be updated to reflect comments received. The SA Report will need to be updated to accompany the Publication (Regulation 30) version of the Local Plan. It will be essential for the SA Report and the Local Plan to remain consistent.
D3: Making decisions and providing information			
Stage E: Monitoring the significant effects of implementing the Local Plan			
E1: Finalising aims and methods for monitoring	“ <i>Member States shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action</i> ” (Article 10.1)	Monitoring will commence once the Local Plan has been adopted. A draft monitoring framework is included within Chapter 5 of this SA Report.	Monitoring undertaken for the SA process should feed into the Annual Monitoring Report AMR).
E2: Responding to adverse effects			

The following sections detail the activities that have been, and are proposed to be, undertaken at each stage of the SA process. This provides context and background to the SA to date

including its agreed scope, the methodology for the appraisal of the Local Plan, and the technical limitations to the appraisal.

2.3 Stage A: Setting the Context, Establishing the Baseline and Deciding on the Scope

2.3.1 Review of Plans, Policies and Environmental Protection Objectives

The box below stipulates the SEA Directive requirements for this stage of the process.

Box 1: SEA Directive Requirements for the Review of Plans Programmes and Environmental Protection Objectives

The SEA Directive requires that the SEA covers:

'an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes' (Annex 1 (a)).

'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation' (Annex 1 (e))

A review of other plans and programmes that may affect the preparation of the Local Plan was undertaken in order to contribute to the development of both the SA and the Local Plan. This included:

- Identification of any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identification of any baseline data relevant to the SA.
- Identification of any external factors that might influence the preparation of the plan, for example sustainability issues.
- Identification of any external objectives or aims that would contribute positively to the development of the Local Plan.
- Determining whether there are clear potential conflicts or challenges between other identified plans, programmes or sustainability objectives and the emerging Local Plan.

The review included documents prepared at international, national, regional and local scale. A brief summary of the documents reviewed and the main findings are summarised below with further details presented in Appendix A.

International Plans and Programmes

A review was undertaken of key International Conventions and European Directives that could potentially influence the development of the Local Plan and the SA. European Directives are transposed into national legislation in each individual Member State and, therefore, there should be a trickle-down effect of the key principles and an application to the relevant national, regional and local circumstances in other planning documents.

National Plans and Programmes

A review was undertaken of relevant White Papers, plans and strategies. One of the most

important documents reviewed was the UK Sustainable Development Strategy⁴ which outlines the over-arching Government objective to raise the quality of life in our communities.

Central Government establishes the broad guidelines and policies for a variety of different topics which are now brought together in the National Planning Policy Framework (NPPF). The NPPF streamlines national planning policy into a consolidated set of priorities to consider when planning for and deciding on new development.

It sets national priorities and rules only where it is necessary to do so. It aims to ensure that planning decisions reflect genuine national objectives - such as the need to safeguard the natural environment, combat climate change, and to support sustainable local growth - while allowing for local authorities and communities to produce their own plans, reflecting the distinctive needs and priorities of different parts of the country. The principle of sustainable development is at the heart of the NPPF.

The NPPF guidance is structured around the following sections:

- Building a strong, competitive economy;
- Ensuring the vitality of town centres;
- Supporting a prosperous rural economy;
- Promoting sustainable transport;
- Supporting high quality communications infrastructure;
- Delivering a wide choice of high quality homes;
- Requiring good design;
- Promoting healthy communities;
- Protecting Green Belt land;
- Meeting the challenge of climate change, flooding and coastal change;
- Conserving and enhancing the natural environment;
- Conserving and enhancing the historic environment;
- Facilitating the sustainable use of minerals;
- Plan-making; and
- Decision-taking.

Regional and Sub-Regional Level Plans

A wealth of different plans and strategies have been produced at the regional (London) and sub-regional (East London / North London) level covering a variety of topics including; housing; economic development and performance; climate change (including flood risk); renewable energy; innovation; rural development; waste management; accessibility; equality and diversity; health; waste; cultural provision and diversity; and physical activity. All of the objectives of these plans as well as some of the challenges they raise need to be taken on board and driven forward by the borough as appropriate. However, it must be noted that the overarching goals of some of these plans and strategies may be outside the remit of the Local Plan which forms only an individual part of a number of different vehicles trying to deliver regional and sub-regional targets.

⁴ UK Sustainable Development Strategy: Securing the Future (2005) and the UK's Shared Framework for Sustainable Development, One Future – Different Paths (2005)

The Localism Act was granted Royal Assent on 15th November 2011. This Act seeks to rescind some regional planning documents. However, regional level plans such as the London Plan (2011) have been included within the review along with relevant objectives and targets, as the Plan remains in force.

Local Policy

Plans produced at the local level specifically address issues relating to the economy; health; safety; tourism; sustainable communities; housing; employment; and physical activity. The Local Plan and the SA should draw from these documents and transpose their aims in their policies and proposals. These local policy plans have been instrumental in the development of the SA Framework (refer to Section 6). These plans should in theory have included the main influences of international, national, regional and county level plans through the 'trickle-down effect'. They should also provide more of a local focus for the LLDC area. It is, through identifying these themes and incorporating them into the Local Plan that synergies can be achieved with other relevant documents.

Key Results from the Review

There were many common themes emerging through the review of plans, programmes and environmental protection objectives. The list below provides a summary of the main themes and issues identified:

- The need to reduce greenhouse gas emissions and increase energy efficiency.
- The need to ensure that new housing development meets local needs (for all sections of society). This is a particularly important issue in London where affordable housing issues are particularly prevalent (refer to Section 5 for further details).
- The need to protect and enhance vibrancy.
- Promoting convergence and community participation.
- The need for the protection and enhancement of the quality and character of urban areas.
- Recognising the need for the townscape to evolve and for development to be appropriate to townscape setting and context.
- The need to conserve and enhance biodiversity as an integral part of economic, social and environmental development.
- The need to protect and enhance the historic environment.
- The need to promote sensitive waste management.
- The need to promote more sustainable transport choices and to improve accessibility.
- The need to promote the use of renewable energy and renewable technologies in appropriate locations.
- Recognising the importance of open spaces, sport and recreation and the contribution that they make to enhancing quality of life.
- The need for prudent use of natural resources.
- The need to promote and protect the water environment including issues such as quality and resource use.
- To need to protect and enhance air quality.
- The need to promote community cohesion and to establish communities where individuals want to both live and work.
- The need to adapt to the threat posed by climate change.

- The need to protect and enhance biodiversity resources.
- The need for long-term sustainable patterns of development that provide for the economic and social needs of all populations.
- The need to reduce crime and fear of crime.
- The need to protect and enhance ecosystem functions and services.
- Raising levels of health and well-being and promoting greater levels of physical activity.
- Establishing a housing market that meets the needs of all residents.
- Promoting sustainable economic development and a range of employment opportunities that meet the needs of all sectors of the population and all skills levels.
- Promoting high levels of equality and inclusion.
- Promoting higher levels of design quality.

The European Spatial Development Perspective identified a potential conflict that is likely to prevail in all countries, irrespective of their location and this concerns balancing the social and economic claims for spatial development with an area's ecological and cultural functions to ensure that the most sustainable patterns of development are achieved. Through the SA process and the inclusion of suitable sustainability objectives, indicators and targets, it should be possible to identify where potential issues and conflicts may arise and to develop suitable policy modifications and mitigation measures.

2.3.2 Establishing the Baseline

Box 2 defines the SEA Directive requirements for this element of the process.

Box 2: SEA Directive Requirements for Baseline Data Collation

The SEA Directive requires that the SEA covers:

'the environmental characteristics of areas likely to be significantly affected' (Annex 1 (c))

'any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EC' (Annex 1 (d)).

Characterising the environmental and sustainability baseline, issues and context helps to define the SA Framework. It involves the following key elements:

- Characterising the current state of the environment within the LLDC area and immediate surroundings (including social and economic aspects as well as the natural environment); and
- Using this information to identify existing problems and opportunities which could be considered in the Local Plan where relevant.

The baseline was characterised through the following methods:

- Review of relevant local, sub- regional, regional, national and international plans, policies and environmental protection objectives;
- Data gathering using a series of baseline indicators developed from the SEA Directive topics, the PAS guidance, and the data available for the area.
- Consideration of the scope and contents of the Local Plan.

A detailed description of the baseline characteristics of the LLDC area is provided in Appendix B, together with any identified data gaps and inadequacies. Obtaining these datasets would help to further increase the knowledge of the areas and therefore the potential impacts of the Local Plan. Such data gaps could potentially be overcome through the use of the monitoring framework.

The baseline data has been used to identify the key sustainability issues and opportunities within the LLDC area, a summary of which is presented in the paragraphs below. Although these have been grouped by broad sustainability theme, many are indirectly or directly linked and are therefore closely related.

Key Sustainability Issues and Opportunities

Population

- Tower Hamlets showed the highest growth in population observed within England and Wales between 2001 and 2011 and the third highest population density in London in 2010.
- Newham had the second highest population growth of all the boroughs within England and Wales.
- Hackney had the fourth highest population growth within England and Wales in 2011 and was the fourth most densely populated borough in 2010. Between 2010 and 2035; the population of the borough is projected to increase by 30.0%.
- The high level of growth anticipated within Hackney, Tower Hamlets, Newham and Waltham Forest are an indication why large numbers of new homes will be considered necessary within the boroughs.
- The 2011 Census revealed the population of all four boroughs continues to be heavily skewed towards the 25-29 age cohort.
- It should be ensured that the needs of all including ethnic minorities such as Black or Black British and Asian or Asian British (main ethnic minorities within Hackney, Tower Hamlets, Newham and Waltham Forest) are met in new development such as appropriate services provision, education, housing etc.
- The 65+ group is projected to see the greatest increase in the next 25 years in the four boroughs therefore opportunities to provide appropriate housing for the elderly should be sought.

Education and Qualifications

- Educational attainment across Hackney and Waltham Forest is below the regional and national average. However, educational attainment across Newham and Tower Hamlets is higher than England averages although lower than the London average.
- The percentage population holding National Vocational Qualification (NVQ) Level 4 or above in Hackney and Tower Hamlets is higher than both regional and national levels and for Newham and Waltham Forest, levels are lower than the regional percentage but higher than the national percentage.
- There is a need to improve educational attainment across all four boroughs. By improving levels of educational attainment there could be wider social benefits and improvements to the local economy.
- Those not in education, employment, or training (NEETs) % of 16 – 18 year olds in Hackney and Waltham Forest is lower than that for Newham and Tower Hamlets, however, higher than that for London.
- It should be ensured that any new residential development on the LLDC area does not put pressure on existing educational establishments.

- Opportunities to incorporate work based learning / training should be incorporated into the LLDC development where possible. These opportunities could also be linked to the colleges and universities within the four boroughs the LLDC area is located within.
- It should be ensured that new high quality educational establishments are developed on the LLDC area if there are capacity problems with existing schools.

Health

- Life expectancy from birth for males in 2008-2010 in Hackney is lower than the national average and life expectancy from birth for females is slightly higher than national averages. Life expectancy from birth for males and females in 2008-2010 in Tower Hamlets, Newham and Waltham Forest are all lower than the national average.
- Levels of teenage pregnancy (15-17) in Hackney, Newham and Waltham Forest are higher than regional and national levels and which has implications for health service provision, housing and educational attainment.
- The percentage of people engaging in regular sport or exercise in Tower Hamlets is higher than regional and national averages; however, the percentage of people engaging in regular sport or exercise in Hackney, Newham and Waltham Forest is lower than regional and national averages.
- It should be ensured that new development does not lead to capacity issues with existing local health care facilities and gaps in health care provision are identified.
- There is a need to reduce the incidence of diseases and health inequalities. There are opportunities to contribute to reducing this through the Plan and thus creating a happy, healthy sustainable community on the LLDC area.
- Opportunities should be incorporated into design guidelines for LLDC developments to encourage people to lead healthy lifestyles and participate in regular exercise.
- Sustainable transport such as the use of buses, the DLR, walking and cycling should be maximised within the LLDC area in order to access employment, nature, essential services and facilities.
- New health care facilities should be developed on the LLDC area if new development leads to pressure on existing facilities although it should be noted that proposed large developments are providing facilities.

Crime

- The overall crime rate in Tower Hamlets, Newham and Waltham Forest have decreased by 1.6, 7.8 and 3.1 crimes per thousand respectively from 2009-2010 to 2011-2012.
- The type of crime with the highest rate in 2010-2011 in Hackney, Tower Hamlets Newham and Waltham Forest was violence against a person.
- The number of wounding or other acts endangering life offences overall increased significantly across all four boroughs in 2010-2011.
- There is a need to tackle anti-social behaviour across all four boroughs.
- Opportunities to reduce fear of crime should be incorporated into the design of new development at the LLDC area through promoting social inclusion, permeability and increasing natural surveillance.
- Secured by design principles should be incorporated into any new development at the LLDC area.

Water

- There are two main water features within the LLDC boundary the River Lee and the Lee Navigation along with smaller watercourses and ponds which may impose constraints on

future development. However, a positive relationship can exist between developments and waterways as watercourses can be an important asset / key feature in developments.

- The River Lees current ecological quality is considered to be 'moderate' and predicted to remain 'moderate' by 2015. However, improving marginal habitats is recognised as being necessary for heavily modified water bodies to reach good ecological potential. Therefore opportunities should be maximised.
- The London catchment which the LLDC area lies within is highly urbanised with Greater London situated at the heart. The majority of rivers within the catchment are designated heavily modified and there is a distinct lack of natural river processes. The modification of rivers including in-stream structures has led to loss of habitat diversity and the creation of barriers for fish migration. Examples include in-stream structures in the Lee Navigation and Lee Flood Relief Channel. Water quality also remains a significant issue in this catchment. The highly urbanised nature exacerbates the pollution pressures particularly through increased surface water run-off, storm sewage overflows and misconconnections, alongside effluent from sewage treatment works. These issues, the presence of invasive species and physical modification pressures, give rise to poor water quality and habitat diversity for a number of rivers, as well as varied biological quality throughout the catchment. However, legacy development provides the single biggest opportunity to improve the lower reaches of the River Lee and its backwaters.
- There are large areas within the area that are at risk of flooding from both the River Lee Navigation and the River Lee (that pass through the site). There may be a risk of tidal flooding.
- Opportunities to maintain, repair and replace flood defences within the LLDC area should be maximised.
- Surface water and groundwater flood risk is also considered to be an issue within the LLDC area.
- New development can further intensify water run-off rates due to the uses of impermeable surfaces such as concrete and tarmac during construction. Predicted increases to the level of rainfall received, and intensity along with levels of new development could thus combine to potentially increase the risk of flooding in future.
- New developments and households within the LLDC area need to recognise they fall within a 'water stressed' area and should be encouraged to minimise water use and to re-use rainwater where possible i.e. through incorporating water efficient fixtures and fittings, incorporating rainwater harvesting technology and using grey water recycling systems. Discussions regarding water resources availability for new developments should be undertaken with Thames Water.
- Areas at risk from flooding should be protected from development that would increase that risk. New development should be encouraged to use Sustainable Drainage Systems (SuDS) to manage runoff and further reduce flood risk.
- Environment Agency maps show that the LLDC area is underlain by a secondary aquifer which stores groundwater (e.g. the Lambeth Group – clay, silt and sand) and Source Protection Zones 1 and 2 indicate the presence abstraction points for water supply at Old Ford and Stratford Box. Therefore, it should be ensured that groundwater quality is protected particularly during any construction works.
- Opportunities to maximise the use of waterways within the LLDC area for leisure, freight, waste and construction should be sought. Improvements were made at the Three Mills Lock to enable larger barges to enter the LLDC areas waterways network, and were actively used for the construction of the Olympic Park.

Soil and Land Quality

- The LLDC area is largely located on non- agricultural urban land. However, the Agricultural Land maps appear to show part of the north east of the area is located on Grade 4 Agricultural land (poor quality).
- There are four historic landfill sites located within the LLDC boundary.
- Development on the LLDC area represents development on brownfield land and therefore a sustainable use of land resources.
- Any contaminated land encountered on the LLDC area prior to development should be remediated – which would offer benefits to soil and land resources.

Air Quality

- Air Quality Management Areas (AQMAs) are designated in the four London boroughs, where the LLDC area is located, for exceedences in both particulate matter (PM₁₀) and nitrogen dioxide (NO₂).
- Encouraging the use of sustainable modes of transport to access the LLDC area would only benefit local air quality over the long term.

Energy and Climate Change

- New developments should be encouraged to include sustainable design principles, energy efficiency and the incorporation of renewables e.g. the inclusion of solar panels, PV technology and low carbon technologies. The carbon footprint of new development should also be reduced.
- There is a need to expand Heat Networks in the area.
- New development should seek to contribute to the London carbon dioxide (CO₂) reduction targets.
- The local plan should recognise the importance of adaptation to climate change through ensuring flood risk resistance and resilience measures are incorporated into new development along with green infrastructure and sustainable construction techniques are used e.g. ensuring populations keep cool during rising temperatures by locating houses at the correct orientation, using insulation, shutters, shading etc.

Biodiversity, Flora and Fauna

- London itself and the surroundings of the LLDC area are surprisingly green city (approximately 48% of London is surfaced in vegetation, rivers and still waters). Red Path Wood and the Lee Valley Sites of Importance for Nature Conservation (SINCs) are located immediately north of the area boundary.
- Tower Hamlets Cemetery Park is located approximately 720m southwest. However, the closest nationally important ecological site is Walthamstow Marshes Site of Special Scientific interest (SSSI), which is approximately 2.2km northwest and the closest internationally important site is Epping Forest SAC located approximately 3.1km northeast.
- The London Borough of Newham's Biodiversity Action Plan identifies two areas within the LLDC area considered to have deficient access to nature; therefore opportunities to maximise accessibility to nature should be incorporated into any new development.
- There is a need to consider Biodiversity Action Plan commitments.
- The watercourses within the LLDC area are assigned a unique reference number and are currently classified (with regards to the WFD) as follows:
 - River Lee, from Tottenham Locks to the Tideway (GB106038077852) - current status is moderate.

- River Lee Navigation, tidal section (GB70610068) - current status is moderate.
- Regents Canal, lower section (GB70610510) - current status is moderate.

All these watercourses are classed as heavily modified and the target is to reach good ecological potential by 2027. Opportunities should also be sought to ensure there is no deterioration in a current water body status as a result of development or policy approach.

- Opportunities to enhance biodiversity habitats should be maximised. Opportunities, where possible, should be sought to develop new and enhance a network of public open space, green grid infrastructure and blue ribbon network within the LLDC area. In addition, other opportunities should be sought to retaining existing habitats, such as water features, as they provide habitats for local species.
- Opportunities should be sought to not limit the protection and enhancement of biodiversity and green infrastructure to the Queen Elizabeth Olympic Park, but the whole of the LLDC, through the delivery of biodiverse habitats and green infrastructure (including in the built environment).
- Opportunities to align the Local Plan with the revised Local Biodiversity Action Plan and Green Infrastructure Strategy should be maximised.

Cultural Heritage

- Hackney, Tower Hamlets, Newham and Waltham Forest are home to a wealth of heritage assets including those of a national importance. These include Listed Buildings and Conservation Areas within the area boundary and Registered Historic Parks and Gardens and Scheduled Ancient Monuments located within close proximity to the LLDC area.
- The LLDC area located within Newham is considered to be within an archaeological priority area.
- Opportunities should be sought to conserve the setting of Listed Buildings within and adjacent to the LLDC boundary. In addition, it is important to ensure that the wider historic landscape is protected and that cultural heritage issues are taken into consideration.
- As expressed in the National Planning Policy Framework the setting of a heritage asset can contribute to its significance. Therefore opportunities to enhance and better reveal the significance of heritage assets, through responsive developments within the setting of heritage assets should be maximised.
- Cultural heritage features should be conserved and enhanced. In addition measures to protect / enhance heritage assets identified to be 'at risk' should be included within the Local Plan.

Landscape

- There are no designated landscape assets (i.e. AONBs or National Parks) within 20km of the LLDC area.
- It is essential that townscape character and quality is maintained / enhanced through high quality design, careful siting, and the incorporation of soft landscaping.
- There are opportunities to incorporate open green corridors and attractive green areas within the LLDC area.
- Locally protected views ((i) from Stratford City and (ii) from the Athletes' Village to Cobham Farm to the Velodrome) should be protected.

Minerals and Waste

- The residual waste per household in Hackney, Tower Hamlets and Waltham Forest was less than the regional average.
- Recycling rates saw an overall increase in all four boroughs from 2001-2011.

- Opportunities should be sought to enhance reuse, recycling and composting performance. Percentage of household waste sent for reuse, recycling or composting needs to be increased for all the boroughs, particularly in Newham where the rate for 2010-2011 was 14.9%.
- Opportunities should be sought to reuse materials and incorporate recycled construction materials into new development.
- Opportunities to maximise the use of waterways within the LLDC area for transporting waste should be sought.

Transportation

- The LLDC area appears to be well connected strategically by transport infrastructure and public transport links, making the area relatively accessible. Strategic infrastructure is established and has been previously enhanced to support the Olympic Games, with the minor exception of routes north of Stratford towards Waltham Forest.
- Stratford regional and international, Pudding Mill Lane DLR and Hackney Wick London Overground stations are located within the LLDC area.
- Hackney has one of the highest rates of cycling in London, having increased by 70% in recent years.
- A significant proportion of the population within the four boroughs drive to work via car / van.
- Opportunities should be sought to reduce reliance on the private car to reduce current local issues with congestion.
- Opportunities should be sought to promote cycling / walking through new development delivered on the LLDC area as this would also indirectly benefit health. This could be achieved through developing a network of high quality cycle / footpath routes that connect the area to the surrounding areas.
- Opportunities to use the Green Infrastructure Strategy (which is currently under revision) as a blueprint for the direction of travel in the LLDC area, linking it up with other Green Infrastructure and biodiversity assets in neighbouring authorities should be sought.
- There are opportunities to significantly promote rail travel on the LLDC area due to the presence of a range of stations within the area.
- There are opportunities to promote the use of bus services within the local travel context.
- Opportunities to maximise the use of waterways within the LLDC area for leisure, freight, waste and construction should be sought. Improvements were made at the Three Mills Lock to enable larger barges to enter the LLDC areas waterways network, and were actively used for the construction of the Olympic Park.

Economy

- The economic activity rates for Hackney, Tower Hamlets, Newham and Waltham Forest are all lower than regional and national levels.
- Levels of economic inactivity within all four boroughs are lower than regional and national levels.
- There are opportunities to enhance the role of Stratford City as a sub-regional centre and Hackney Wick as a neighbourhood centre.
- There are opportunities to increase employment opportunities through other employment hubs (such as the International Broadcasting Centre) in the area. The good transport links to the LLDC area should be exploited as accessibility is a key issue when attracting new residents / inward investment / creating employment opportunities.

Deprivation and Living Environment

- There are a number of wards within Hackney, Tower Hamlets, Newham and Waltham Forest that are considered to be in the bottom 20% most deprived nationally.
- Deprivation is a very complex issue and a number of different issues will need to be addressed for noticeable improvements to be realised. Enhancements on the LLDC area that deliver employment opportunities, high quality new housing, improved public realm, access to nature would all benefit deprivation.

Housing

- House price inflation alongside the recent recession has impacted significantly on housing affordability across London.
- Overcrowding is a key problem in Hackney with 10% of households being officially overcrowded.
- With the projected increase in population and a large projected increase in the 65+ age group in Hackney, Tower Hamlets, Newham and Waltham Forest, there will be a need for appropriate housing for the elderly.
- If new housing is to be delivered on the LLDC area, consideration should be given to the considerable need within all four boroughs of affordable housing.
- Housing regeneration (if incorporated on to the LLDC area) presents a significant opportunity both to revitalise the housing stock and to improve quality of life. In addition, housing regeneration should also include should retrofitting for climate change and water resource reduction.
- The population growth in London and need for housing should be considered when providing housing in the LLDC area.

Transboundary Issues

For many authorities, the geographical scale of particular baseline issues means that they relate closely to neighbouring authorities. For example, housing provision and prices, employment migration and commuting, service provision and education can all result in flows of people across Local Authority boundaries. In order to help to characterise the baseline further, some of these key 'transboundary' issues have been identified below.

- There is not enough affordable housing being constructed in London to meet current demand; and as the number of households in London grows, demand for affordable housing will increase. In addition, there is generally a shortage of family sized housing within the four London boroughs the LLDC area is located. These issues may be exacerbated in future years if trends remain the same. There are therefore opportunities for the LLDC Local Plan to contribute to reducing this trend.
- Fluvial flood risk in Hackney Wick also affects the London Borough of Hackney and a smaller area of the London Borough of Tower Hamlets therefore is a transboundary issue. Hackney's Level 2 Strategic Flood Risk Assessment identified a possible flood alleviation scheme involving a sheet piled flood defence along the Lee Navigation within both boroughs, with a compensatory flood storage area upstream in Hackney Marshes.
- Surface water flood risk and the measures to manage this may also be a transboundary issue e.g. surface water runoff from one borough having an impact on a neighbouring borough. LLDC need to work in partnership with the neighbouring boroughs to ensure flood risk is reduced for future generations.
- Employment and economic activity rates within the four boroughs the LLDC area is located in are a significant issue (particularly if Canary Wharf is removed from the equation), which may discourage new business from locating within the LLDC area.

- Open space is declining across London due to pressures from developers; therefore this is important that the LLDC Local Plan incorporates open space.
- Cumulative impacts regarding major roads should be considered.

2.3.3 Scope of the Appraisal

The SA process commenced in 2012 with the preparation of an SA Scoping Report for the LLDC Local Plan as a whole (Hyder Report Reference: 002-UA005031-UE31-01). The Scoping Report contained:

- Characterisation of the environmental, social and economic baseline within the LLDC area and the surrounding four London Boroughs;
- A review of relevant plans, programmes and environmental protection objectives that could influence the SA and the development of the Local Plan;
- Identification of key sustainability issues and opportunities, together with recommendations for mitigation where required; and
- The development of the SA Framework against which the elements of the Local Plan have been assessed.

Geographical Scope of the Appraisal

The Scoping Report set out the scope and approach to the assessment of the Local Plan. The geographical scope of the SA was driven by the geographical scope of the Local Plan. The SA therefore assesses the LLDC area and considers the spatial extent of its likely impacts.

Temporal Scope of the Appraisal

The LLDC sets out the framework for facilitating the determination of future planning applications within the LLDC area until 2031.

Topics Covered in the Appraisal

The SA comprises the consideration of the environmental, social and economic effects of the Local Plan. The baseline characterisation has therefore reflected the topics set out in the SEA Directive, but also considers relevant additional social and economic topics as recommended in the PAS SA guidance. Table 2-2 identifies the topics covered, together with their relationship with the topics listed in Annex I of the SEA Directive.

Table 2-2 Topics Covered in the SA and Relevant SEA Directive Topics

Topics covered in the SA	Relevant topics listed in Annex I of the SEA Directive
Population	Population and Human Health Material Assets
Education and Qualifications	Material Assets
Health	Population and Human Health Material Assets
Crime	Population and Human Health
Water	Water and Soil
Soil and Land Quality	Water and Soil Material Assets
Air Quality	Air
Energy and Climate Change	Climatic Factors
Biodiversity, Flora and Fauna	Biodiversity, Flora and Fauna
Cultural Heritage	Cultural heritage and landscape
Landscape	Cultural heritage and landscape
Minerals and Waste	Material Assets
Transportation	Material Assets
Economy	Material Assets
Deprivation and Living Environment	Population and Human Health Material Assets
Housing	Material Assets

Annex I of the SEA Directive also requires an assessment of secondary, cumulative and synergistic effects, the results of which are provided in Chapter 4. Transboundary impacts on neighbouring authorities are considered inherently throughout the assessment.

2.3.4 The Scoping Consultation

The Scoping Report was issued for public consultation in February 2013, for a four week consultation period. The aim of this was to obtain comment and feedback upon the scope and level of detail of the SA.

It was issued to the three statutory consultees (the Environment Agency, English Heritage and Natural England) and transport for London along with the public through the reports availability on the Legacy Corporation's website. In addition, the four boroughs were also specifically consulted upon the scope of the sustainability appraisal. The report was subsequently updated following this consultation feedback.

2.3.5 The SA Framework

The SA Framework was developed at the scoping stage. It underpins the assessment methodology and comprises a series of 15 aspirational objectives (SA Objectives) against which the Local Plan has been assessed. The SA Objectives are intended to be overarching and

aspirational. To ensure a consistent approach, the SA Objectives are common to all the SAs conducted for elements of the Local Plan. They address the full cross-section of environmental, economic and social sustainability issues within the LLDC area.

The SA Objectives have been developed using the review of other relevant plans, programmes and environmental protection objectives, the baseline data and the key issue and opportunities identified. Each of the SA Objectives is supported by a series of sub-objectives to add further clarity and to assist the assessment process. These sub-objectives have been considered by the assessors when undertaking the appraisal in order to inform their decision.

The SA Objectives and associated sub-objectives are presented in Table 2-3.

Table 2-3 SA Objectives and Sub-Objectives

SA Objective		Sub-Objectives	Indicators and sources
1	To reduce crime, disorder and fear of crime	<ul style="list-style-type: none"> ▪ To reduce levels of crime ▪ To reduce the fear of crime ▪ Improve environmental safety (street lighting, visibility etc.) ▪ To avoid the creation of isolated places during day and night ▪ To reduce levels of anti-social behaviour and improve safety for children and young people ▪ To encourage secured by design 	<ul style="list-style-type: none"> ▪ Crime rates per 1000 of the population for key offences including burglary (Office for National Statistics Local Profiles). ▪ Percentage of people who thought anti-social behaviour was a problem in their local area (Place Survey).
2	To improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> ▪ To increase levels of participation and attainment in education for all members of society ▪ Set mechanisms in tackling lower levels of attainment and specific barriers to certain disadvantaged groups pursuing higher education ▪ To improve the provision of education and training facilities, particularly for young people and the long term unemployed 	<ul style="list-style-type: none"> ▪ Percentage of pupils achieving five or more GCSEs at Grades A* - C or equivalent (Office for National Statistics Local Profiles). ▪ Percentage of people aged 19 – 50/64 who have attained a Level Four NVQ or higher (Office for National Statistics Local Profiles). ▪ Percentage of the population aged 16-74 with no qualifications (Office for National Statistics Local Profiles). ▪ Percentage of 16-18 year olds not in education, employment or training (NEETs) (Department for Education). ▪ Education, Skills and Training Deprivation (Indices of Deprivation for England 2010). ▪ Proportion of people aged 16-64 who received job related training (Annual Population Survey (APS) NOMIS, Office for National Statistics). ▪ Lower Super Output Areas (LSOAs) in the bottom 20% for education, skills and training deprivation (Indices of Deprivation for England).
3	To improve physical and mental health and	<ul style="list-style-type: none"> ▪ To reduce health inequalities ▪ To improve access to health and social care 	<ul style="list-style-type: none"> ▪ Percentage of adults who are overweight or obese ▪ Percentage of the resident population who

SA Objective	Sub-Objectives	Indicators and sources
wellbeing for all and reduce health inequalities	<ul style="list-style-type: none"> ▪ To reduce health inequalities amongst different groups in the community ▪ To promote healthy lifestyles and provide the necessary facilities to promote this, such as open space, sport facilities and active travel (walking and cycling). ▪ To maximise crosscutting opportunities to deliver health gains through better informed and health focused partnership working i.e. through better housing, better environment, higher educational attainment and skills. ▪ To help reduce obesity. ▪ Encourage the development of strong, cohesive communities 	<ul style="list-style-type: none"> consider themselves to be in good health (surveys). ▪ Life expectancy at birth for males and females (Office for National Statistics Local Profiles). ▪ Standardised mortality rates for all cause of death, circulatory disease and all cancers (Neighbourhood Statistics, Office for National Statistics) ▪ Distribution of and GPs and dentists (Local Authorities). ▪ Percentage of people participating in regular sport or exercise (defined as taking part on at least 3 days a week in moderate intensity sport and active recreation for at least 30 minutes continuously in any one session) (Sport England Active People Survey). ▪ Conception rate of 15-17 year olds (per 1,000) (Office for National Statistics). ▪ Health Deprivation and Disability (Indices of Deprivation for England). ▪ Long- standing conditions in Hackney (The Information Centre for Health and Social Care).
4 To ensure housing provision meets local needs	<ul style="list-style-type: none"> ▪ Ensure that there is sufficient housing to meet identified needs in all areas i.e. increase the amount of family housing ▪ Ensure that housing meets acceptable standards ▪ Increase the range and affordability of housing for all social groups within the LLDC area boundary ▪ Meet the needs of the older and vulnerable ▪ To reduce homelessness and overcrowding ▪ To reduce the number of households in temporary accommodation ▪ To ensure that appropriate social and environmental infrastructure is in place for new residents 	<ul style="list-style-type: none"> ▪ Average house price (Department for Communities and Local Government, from Land Registry). ▪ Ratio of relative housing affordability (Office for National Statistics Local Profiles). ▪ Number of vacant dwellings (Office for National Statistics Local Profiles). ▪ Dwelling Stock by Tenure (Office for National Statistics Local Profiles). ▪ Number of affordable housing completions (Office for National Statistics Local Profiles). ▪ Number of Homeless presentations (Neighbourhood Statistics ONS Office for National Statistics).

SA Objective	Sub-Objectives	Indicators and sources
5	<p>To improve sustainable access to jobs, basic goods, services and amenities for all groups</p> <ul style="list-style-type: none"> ▪ Ensure that public transport services meet people's needs ▪ Ensure that highways infrastructure meets people's needs (including walking and cycling routes) ▪ Promote the use of sustainable travel modes (rail and buses) and reduce dependence on the private car ▪ Improve accessibility to work and services by public transport, walking and cycling ▪ Improve access to cultural and recreational facilities ▪ Improve access to open space ▪ Increase the amount of wheelchair accessible buildings ▪ Facilitate the efficiency in freight distribution ▪ Encourage a modal shift to more sustainable forms of travel as well as encouraging greater efficiency (i.e. through car-sharing) ▪ To reduce road traffic accidents 	<ul style="list-style-type: none"> ▪ Distribution of major transport systems – roads, rail, cycle links etc. (Ordnance Survey mapping). ▪ Journey to work by mode (2001 Census).
6	<p>To reduce poverty and social exclusion whilst promoting social inclusiveness and equality</p> <ul style="list-style-type: none"> ▪ Reduce multiple deprivation and social exclusion in those most affected. ▪ Improve social cohesion. ▪ Foster a sense of pride in local neighbourhoods ▪ Set mechanisms for local people not to lose out on the benefits of the legacy ▪ Encourage engagement in community activities ▪ Tackle barriers to participation ▪ Respond to community needs and desires ▪ To ensure that the Local Plan ensures equitable outcomes for all communities, particularly those most liable to discrimination, poverty and social exclusion. 	<ul style="list-style-type: none"> ▪ Number and percentage of lower super output areas in the most deprived 10% lower super output areas for London ▪ Average house price compared to average annual salary ▪ Number and percentage of domestic units that are provided for affordable housing per year ▪ The number of homelessness presentations received by each Borough per 1000 households annually ▪ Percentage of population of a working age qualified to NVQ level 4+ or equivalent
7	<p>To encourage sustainable economic growth, inclusion and business development</p> <ul style="list-style-type: none"> ▪ Encourage indigenous business ▪ Encourage inward investment ▪ Make land and property available for business development ▪ Encourage new and improve business development and opportunities ▪ Improve the resilience of business and the economy ▪ Promote growth in key sectors or clusters ▪ Enhance the image of the areas as a business location 	<ul style="list-style-type: none"> ▪ UK Competitiveness Index ▪ Number of jobs in the Growth Boroughs ▪ Gross Value Added (GVA) per head of local population ▪ Full time gross median pay (£/week) ▪ Percentage of residents working age population in employment ▪ The percentage of unemployed people claiming benefits who have been out of work for over a year ▪ Proportion of residents on Jobseeker's Allowance

SA Objective	Sub-Objectives	Indicators and sources
	<ul style="list-style-type: none"> ▪ Improve job density ▪ Reduce skill shortages ▪ Reduce poverty and help improve earnings ▪ Provide job opportunities and improve quality of life to the most deprived sections of the community ▪ Improve business development and resilience, and enhance business competitiveness ▪ Help to diversify the economy ▪ To prevent the loss of local businesses ▪ To encourage business start-ups and support the growth of businesses ▪ Reduce levels of deprivation ▪ Support the development of green industries, resilience to climate change and a low carbon economy ▪ Help maintain London as an internationally competitive city 	<ul style="list-style-type: none"> ▪ Amount of land (in hectares) available for employment
8	<p>To increase employment opportunities for all residents in the local area</p> <ul style="list-style-type: none"> ▪ Improve the range of employment opportunities ▪ Provide employment opportunities for the local community and stimulate regeneration ▪ Help to improve earnings ▪ Help improve learning and the attainment of skills ▪ Reduce unemployment, including long-term unemployment ▪ Provide jobs at higher skill levels ▪ Promote adjacency of employment, recreation and residential areas in urban areas 	<ul style="list-style-type: none"> ▪ Economic activity rate (ONS- NOMIS). ▪ Employment by occupation (ONS- NOMIS). ▪ Employment by industry (ONS- NOMIS). ▪ Percentage of resident population claiming Jobseekers" Allowance (ONS – NOMIS). ▪ Average gross weekly pay (2011 ONS- NOMIS). ▪ Job density (ONS- NOMIS)
9	<p>To protect and enhance biodiversity</p> <ul style="list-style-type: none"> ▪ Protect and enhance sites of nature conservation importance ▪ Protect and enhance wildlife especially rare and endangered species ▪ Protect and enhance habitats and wildlife corridors ▪ Provide opportunities for people to access wildlife and open green spaces ▪ Protect and enhance the area's water bodies to achieve a good ecological status (e.g. River Lee, Lee Navigation) ▪ Promote, educate and raise awareness of the enjoyment and benefits of the natural environment ▪ Encourage the protection of trees 	<ul style="list-style-type: none"> ▪ Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, National Nature Reserves (NNR), Local Nature Reserves (LNR) and Sites of Importance for Nature Conservation (SINCs) and Local Wildlife Sites (MAGIC, www.magic.gov.uk and Local Authority websites). ▪ Key Biodiversity Action Plan (BAP) species and habitats present (London BAP). ▪ Percentage of features of internationally and nationally designated sites in favourable condition (SACs, SPAs, SSSIs)

SA Objective		Sub-Objectives	Indicators and sources
10	To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	<ul style="list-style-type: none"> ▪ To protect and enhance townscape character and quality ▪ To promote sensitive design in development ▪ To promote local distinctiveness ▪ To minimise noise pollution (including ambient noise pollution) ▪ To minimise light pollution ▪ To protect and enhance neighbouring park open space areas ▪ Create a variety of functional open space to meet community and environmental needs ▪ Improve opportunities for recreation and play ▪ Promote a clean well – maintained public realm ▪ Promote a high quality of sustainable urban design 	<ul style="list-style-type: none"> ▪ Area (in hectares) of townscape protected by local landscape designations (Green Belt, special landscape area and conservation areas) ▪ Distribution and area of National Parks ▪ Number of eligible open spaces managed to Green Flag standards (Civic Trust and individual local authority websites).
11	To protect and enhance the cultural heritage resource	<ul style="list-style-type: none"> ▪ To protect and enhance historic buildings, sites and assets along with their setting ▪ To protect and enhance historic townscape value including Conservation Areas 	<ul style="list-style-type: none"> ▪ Percentage of conservation areas with an appraisal undertaken in the last 10 years ▪ Percentage of listed buildings 'at risk'
12	To protect and enhance the quality of water features and resources and reduce the risk of flooding	<ul style="list-style-type: none"> ▪ To protect and enhance ground and surface water quality ▪ Requiring sustainable use of water resources ▪ Requiring the inclusion of flood mitigation measures such as SuDS ▪ Reduce and manage flooding ▪ Reduce harmful discharges to surface and groundwater (e.g. polluted runoff from car parks, roads etc.) ▪ Improve water systems infrastructure ▪ Improve the quality of water bodies ▪ To improve the quality of nearby water and indirectly affected waters ▪ To maintain (through replacement or repair) flood defences to ensure an appropriate level of flood protection is achieved for existing and new developments 	<ul style="list-style-type: none"> ▪ Distribution of areas at risk of fluvial flooding (Environment Agency) ▪ Number of planning applications granted permission contrary to Environment Agency advice (Local Planning Authorities). ▪ Water and groundwater quality (Environment Agency). ▪ Daily domestic water use (per capita consumption, litres)

SA Objective		Sub-Objectives	Indicators and sources
13	To limit and adapt to climate change	<ul style="list-style-type: none"> ▪ To reduce greenhouse gas emissions ▪ To require the inclusion of SuDS in new development ▪ To reduce the demand for energy and increase energy efficiency ▪ To increase the use of renewable energy ▪ To reduce CO₂ emissions from the transport sector ▪ Contribute towards helping London meet its emission targets ▪ To promote flood risk resilience measures such as green infrastructure, water efficiency and sustainable construction techniques to reduce impacts of rising temperatures 	<ul style="list-style-type: none"> ▪ Annual emissions of greenhouse gases by end use and sector ▪ Traffic volumes (billion vehicle Km) ▪ Mode of travel to the city centre for all purposes ▪ Average household energy consumption (kWh) ▪ Percentage of major developments that generate a percentage of their energy from renewable sources ▪ Number of properties at risk from river and coastal flooding ▪ Percentage of new development with sustainable urban drainage systems (SuDS) ▪ Number of new housing units approved in Zone 2 and 3 flood risk areas
14	To protect and improve air quality	To protect and improve local air quality	Number of air quality management areas (AQMA)
15	To ensure sustainable use of natural resources	<ul style="list-style-type: none"> ▪ Reduce the demand for raw materials ▪ Promote the use of recycled and secondary materials in construction ▪ Reduce the amount of derelict and vacant land ▪ Ensure that contaminated land will be guarded against ▪ Encourage development of brownfield land where appropriate ▪ Maintain and enhance soil quality ▪ Increase the proportion of waste recycling and re-use ▪ Reduce the production of waste ▪ Reduce the proportion of waste landfilled 	<ul style="list-style-type: none"> ▪ Percentage of housing on previously developed land ▪ Number and area (in hectares) of potentially contaminated sites

2.3.6 SA Objective Compatibility

The 15 SA Objectives have been tested against each other to identify any potential areas of internal incompatibility. The results are presented in Table 2-4 and summarised below.

Table 2-4 Internal Compatibility of the SA Objectives

SA Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
1															
2	0														
3	0	0													
4	0	0	+												
5	+	+	+	0											
6	+	+	+	+	+										
7	+	+	0	0	+	+									
8	+	+	0	0	+	+	+								
9	0	0	+	?	0	+	?	0							
10	0	0	+	?	0	+	?	0	0						
11	0	0	+	?	0	+	?	0	+	+					
12	0	0	+	?	0	0	?	0	+	+	0				
13	0	0	+	?	0	0	?	0	+	+	0	+			
14	0	0	+	?	0	0	?	0	+	+	0	0	+		
15	0	0	0	?	0	0	?	0	+	+	0	+	+	0	

A number of areas of compatibility were identified between the SA Objectives, although there were some uncertainties identified which are documented in more detail below.

The compatibility was assessed as uncertain between SA Objective S4 'To ensure housing provision meets local needs' and also SA7 'To encourage sustainable economic growth, inclusion and business development' against the following SA Objectives:

- SA9 To protect and enhance biodiversity
- SA10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)
- SA11 To protect and enhance the cultural heritage resource
- SA12 To protect and enhance the quality of water features and resources and reduce the risk of flooding
- SA13 To limit and adapt to climate change
- SA14 To protect and improve air quality
- SA15 To ensure sustainable use of natural resources

This is because new development has the potential to adversely affect biodiversity resources through direct land take, landscape and heritage resources from inappropriate siting and water resources through an increase in water consumption and development in the floodplain. In addition new development requires the use of natural resources, raw materials and energy, and can increase pressure upon waste management.

These areas of potential conflict were considered when undertaking the appraisal of the Local Plan policies to ensure that appropriate mitigation was included within the policy wording to address any potential conflicts between new development and protection of the environment.

2.4 Stage B: Developing and Refining Options and Assessing Effects

Options Assessment

The Planning Advisory Service's online Plan-Making Manual identifies that Stage B of the SA process corresponds to developing and assessing the options. Further guidance on how to undertake this is presented in the Government's Practical Guide to the SEA Directive (ODPM 2006).

Drawing upon (and adding to) this guidance, the approach adopted included the following steps:

- 1 High-level review of the Plan Options against the SA Objectives
- 2 Preparing a series of recommendations to assist the LLDC in further developing the Plan Options.

The development of the Local Plan considered options relating to the Vision, Objectives, policies and site allocations. An alternative options form was filled in for each policy, objective, site allocations. The form set out the preferred option wording, reasons for selecting the preferred options, alternatives and why this was not chosen. If no alternatives were considered, then this is also explained in the form. The preferred options and alternatives were assessed against the SA Objectives and the matrix table provides commentary and recommendations for further development. Notations used in the assessment of the options and policies are presented in Table 2-5 below.

Table 2-5 Notations used in the appraisals

Major Positive Impact	The option/strategy/design principle strongly supports the achievement of the SA Objective.	++
Positive Impact	The option/strategy/design principle partially supports the achievement of the SA Objective.	+
Neutral/ No Impact	There is no clear relationship between the option/strategy/design principle and / or the achievement of the SA Objective or the relationship is negligible.	0
Positive and negative outcomes	The option/strategy/design principle has a combination of both positive and negative contributions to the achievement of the SA Objective, e.g. a short term negative impact but a longer term positive impact.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The option/strategy/design principle partially detracts from the achievement of the SA Objective.	-
Major Negative Impact	The option/strategy/design principle strongly detracts from the achievement of the SA Objective.	--

L-T	Effects likely to arise in 10-25 years of Local Plan implementation
M-T	Effects likely to arise in 5-10 years of Local Plan implementation
S-T	Effects likely to arise in 0-5 years of Local Plan implementation
D	Direct effects.
I	Indirect effects.
R	Effects are reversible
IR	Effects are irreversible
H/M/L	High, medium or low certainty of prediction
C	Potential to have cumulative effect with other proposals or plans on this objective

2.4.1 Assessing the Effects of the Local Plan

The findings of the options assessments were fed back to the plan-makers. The options were subsequently developed and refined.

The Local Plan has been assessed against the SA Objectives in order to determine the overall sustainability performance of the document. The following elements of the Local Plan have been assessed:

- Vision and Objectives
- Strategic Policies and Detailed Policies
- Sub Areas Policies and Site Allocations

The detailed appraisal used SA matrices where each objective, policy or site allocation was assessed against the SA Objectives. Commentary and recommendations, such as mitigation measures were provided to improve the Local Plan's sustainability performance.

2.4.2 Mitigation

Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Local Plan. In addition, potential opportunities to benefit and enhance the social, economic and environmental receptors are identified.

As the Local Plan has been developed in parallel to SA process, mitigation measures have been incorporated on a continual basis.

2.4.3 Appraisal of Cumulative and Synergistic Effects

The SEA Directive requires *inter alia* that cumulative effects should be considered. It stipulates consideration of "*the likely significant effects on the environment...*" and that "*These effects should include secondary, cumulative, synergistic...effects*" (Annex I). The Practical Guide sets out the following definitions for these terms:

- Secondary or indirect effects comprise effects which do not occur as a direct result of the proposed activities, but as a result of complex causal pathway (which may not be predictable).

- Cumulative effects arise from a combination of two or more effects, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan or programme have a combined effect.
- Synergistic effects – synergy occurs where the joint effect of two or more processes is greater than the sum of individual effects.

The potential for cumulative, synergistic or secondary or indirect effects as a result of the Local Plan has been inherently considered within the appraisal, the findings of which are presented in Section 4.7.

2.4.4 Appraisal of Transboundary Effects

The SEA Directive also requires SAs to consider the transboundary effects of the plan on other EU member states. These effects have been noted where appropriate throughout the assessment.

2.4.5 Technical Limitations and Uncertainties

During the assessment of the Local Plan, there has sometimes been uncertainty when predicting the potential effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts.

In addition, a number of data gaps are identified within the baseline context where data is unavailable or out of date. Obtaining these datasets would help to further increase the knowledge of the areas, and could potentially be filled through the use of the monitoring framework.

Finally, the Local Plan essentially acts as a guidance document for the future development of the LLDC area. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured.

2.5 Stage C: Preparation of the SA Report

This SA Report presents the findings of the assessment to-date including the information collated in Stage A and during scoping, and documents the entire SA process. The results of the appraisal together with any mitigation measures proposed are recorded in the remaining chapters of this document. The SA Report also includes a separate NTS.

2.6 Stage D: Consultation on the Local Plan and the SA Report

This SA Report has now been issued for the informal consultation alongside Local Plan to key stakeholders for comment. Following the close of the consultation period, LLDC will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Local Plan formal consultation in the summer of 2014, when the Local Plan and the draft SA will be issued to all key stakeholders (including statutory consultees and the public).

2.7 Stage E: Monitoring the Significant Effects of Implementing the Local Plan

The SEA Directive requires that the plan is monitored to test the actual significant effects of implementing the plan against those predicted through the assessment. This process helps to ensure that any undesirable environmental effects are identified and remedial action is implemented accordingly.

Based on the assessment conducted on the options and identification of potential significant environmental effects, a monitoring framework has been prepared and is presented in Chapter 5. Monitoring will be undertaken following adoption of the Local Plan.

3 APPRAISAL OF THE ALTERNATIVES

3.1 Vision and Objectives

Alternative Visions and Objectives were considered during the development of the Local Plan. Table 3-1 below lists the preferred option and alternatives as well as the reasons why the alternatives were not chosen. The more detailed assessment of alternative options is presented in Appendix C. In some cases, no alternatives were considered as this would result in a policy approach that would not be in general conformity with the London Plan. These objectives are listed below:

- Objective 5 - health and wellbeing,
- Objective 6 - urban design and design quality,
- Objective 7 - creating inclusive places
- Objective 11- climate change and energy
- Objective 12 – open space and biodiversity
- Objective 14 - convergence

Table 3-1 Summary Appraisal of Vision and Objectives

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
Vision: Creating jobs and communities – proposes a series of well-connected neighbourhoods and provides for development that focuses on economic growth.	Alternative 1: Emphasis on housing delivery with lower emphasis promoting business and employment growth	Emphasis on housing delivery would not represent the economic growth function of the area.	The preferred option performed particularly well against the economic objectives (SA Objectives 6, 7, and 8). Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth. Both alternatives scored positively against 1 SA Objective 4 but alternative 1 recorded a higher score.
Objective 1, Business growth	Alternative 1: Prioritising housing delivery over business growth.	Emphasis on housing delivery would not represent the economic growth function of the area.	Same as above.
Objective 2 – Jobs	Alternative 1: Alternative as for the Plan Vision, which is prioritising housing delivery over business growth	A different balance in approach would reduce the ability to optimise employment growth and access to jobs	Same as above

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
Objective 3: Housing – to secure a wide range of housing types....	Alternative 1: Alternative as described in the Local Plan Vision as a whole – where the focus is on economic growth but also include a series of well-connected neighbourhoods	-	The preferred objective and the alternative both scored positively against SA 4 (housing). They also have indirect positive effects on SA 3 (health and well-being).
Objective 4, Education – to secure provision of excellent education facilities and opportunities... to meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas	Alternative 1 –Provision of education facilities that only serves the projected population from the new development in the area	This alternative would not aid integration of new and existing communities and would not be consistent with the Strategic Regeneration Framework ‘convergence’ agenda.	The preferred option would benefit more people and would have a higher score against SA Objective 2 (improve levels of educational attainment for all age groups and all sectors of society).
Objective 8 – Creating Neighbourhoods – to expand and create new neighbourhoods...with good links to the amenities and facilities available in the wider area.	Alternative 1 – To focus development around only the existing communities within and around the LLDC area.	This alternative is not seen as a viable approach as the scale and type of development will result in new communities only around existing ones.	The preferred option performed better against the SA Objective 5, since it would ensure that there are good links to amenities and facilities whereas the alternative may not have as good access and may put pressure on facilities and amenities within the existing communities.
SA Objective 9 – Area characters and the historic environment – to create a new place in London comprising of distinctive neighbourhoods	Alternative 1 – to treat the Legacy Corporation area as a single character area.	This alternative would not reflect the existing differences in character and place, for example, between Hackney Wick and Stratford.	The preferred option performs better against SA Objectives 10 (To protect and enhance townscape character and quality) and 11 (To protect and enhance the cultural heritage resource)
SA Objective 10 – Sustainability – to draw together the strands of	Alternative 1: Focused only on environmental	This would reflect the corporate Environmental Policy	The preferred option performs well against social, economic and

Preferred Vision and Objectives	Alternatives not selected	Reasons why not selected	SA Comments
<p>economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area....</p>	<p>sustainability.</p>	<p>of the LLDC but not its wider regeneration remit that includes contributing to delivery of the aspirations of the Strategic Regeneration Framework.</p>	<p>environmental objectives. The alternative will perform better against the environmental SA Objectives: 9 (biodiversity), 10 (townscape character), 11 (cultural heritage), 12 (water features and resources), 13 (climate change), 14 (air quality) and 15 (sustainable use of natural resources) but will score negatively against the social and economic objectives.</p>
<p>Objective 13 –Transport and Connectivity – to seek to maximise growth within the boundaries of existing transport capacity and that of committed projects to improve capacity, while maximising opportunities for local movement...and facilitating local connectivity...</p>	<p>Alternative 1: Growth in transport capacity provision beyond current planned levels to further increase potential development capacity.</p>	<p>This alternative would involve delivery of uncommitted and unidentified transport projects and would not allow achievement of the balance development scenario set out in the vision and would change the overall character and balance in development types and required infrastructure and amenities required.</p>	<p>Both options will have positive effects on the SA Objective 5 – to improve sustainable access to jobs, basic goods, services and amenities for all groups. However, the alternative 1 could have negative effects on SA Objective 15, to ensure sustainable use of natural resources since resources will be used inefficiently. Also, if the transport infrastructure is developed before other elements – such as housing, this may have a negative effect on SA Objective 10, the townscape character.</p>

3.2 Alternative Policies

Alternative Policies were considered during the development of the Local Plan. Appendix D provides details on the preferred options and alternatives as well as the reasons why the alternatives were not chosen. In many cases, no alternatives were considered as this would result in a policy approach that would not be in general conformity with the London Plan or with other high tier planning documents. Some of the alternative options considered are 'business as usual' options where the alternative is not to include the policy in question in the Local Plan. A summary of the 'business as usual' option is provided in Section 3.4.

The detailed appraisal against the SA objectives of the preferred policy options and alternatives is presented in Appendix E and a summary of the findings is presented in Table 3-2 below.

Table 3-2 Summary Appraisal of Policies and Alternatives

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
Strategic Policy SP1: Business, Economy and Employment.	Alternative 1: Emphasis on housing delivery with lower emphasis promoting business and employment growth	Emphasis on only housing delivery would not provide a balanced approach to new development, meeting both employment needs and housing needs within east London and more widely	The preferred option performs particularly well against the economic objectives (SA Objectives 6, 7, and 8). Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth.
Policy BEE.4 Employment uses in other locations	Alternative 1: Not protecting the existing employment floorspace, outside of specifically designated areas Alternative 2: Promoting change to housing	Potential loss of a significant level of employment generating floorspace.	Same as above.
Policy BEE.5 Mixed use locations.	Alternative 1: Encouraging a housing focus in all locations outside of the protected employment areas	Emphasis on only housing delivery would not provide a balanced approach to new development, meeting both employment needs and housing needs within east London and more widely	Same as above.
Policy BEE.7: Town, Neighbourhood and Local Centres.	Alternative 1: Designate the existing centre at Stratford and not promote new more local centres.	Lack of coherence in retail and service provision for local communities; it would also leave only a partly designated neighbourhood centre at Hackney Wick/Fish Island.	The preferred option performs well against the economic objectives (SA Objectives 7 and 8). Alternative 1 is less likely to contribute to economic objectives because it concentrates employment and retail activities only at one existing centre.
Policy BEE.11: Schools	Alternative 1: A policy that only includes criteria for accessibility and safety of the school and its location (i.e. not addressing the need for a proposed school).	The existing planned provision is potentially capable of meeting planned growth, alongside uncertainty of the level of child yield from the significant amount of new development.	As uncertainty exists of the number of children / pupils in the new residential areas it is considered that the preferred option offers an element of flexibility to base any provision on future demand. The preferred option performs well against health and sustainability access SA objectives 3 and 5.
Strategic Policy SP2: Housing	Alternative 1: Maximisation of housing delivery with prioritisation of housing over other uses	It would fail to meet the economic and employment objectives set for the area	Alternative 1 is less likely to contribute to economic objectives because it sets out a housing led approach to growth.
Policy H3: Affordable housing	Alternative 1: All affordable housing provision to be on-site	Alternative 1 would not provide flexibility in the minority of cases where off-site provision of the required quantum of affordable	There would be no significant difference between the alternative and the preferred option with regards to

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
		housing is more appropriate or more achievable in the light of viability	performance against SA objectives. The preferred option is more likely to encourage investment in new residential developments; however the level of certainty of prediction is rather low.
Policy HBE.6: Local Identity	Alternative 1: Propose a number of separate policies, for example an individual policy on conservation areas, tall buildings, and listed buildings.	Holistic approach is better suited to the diverse townscape characteristics that fall within its area.	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives as essentially the two options will equally contribute to the SA objectives.
Strategic Policy 5: Natural Environment	Alternative 1: Focus on protecting and enhancing the Natural Environment	The Local Plan recognises the strategic value of an effective series of Green Grid and Blue Ribbon networks as part of the Natural Environment in the LLDC area and within the wider London context	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives. The preferred option is more specific in its definition therefore it provides more clarity with regards to its purpose.
Policy NE1: Integrating the built and natural environment.	Alternative 1: State in the second paragraph of the policy: “maximising opportunities” for inclusion of habitat and species, rather than “maximising the provision”.	Proposal for development would be able to set up the opportunity to include habitat and species within a development, rather than actually providing new areas of habitats and species.	Both options will have positive effects on the SA Objective 9 – to protect and enhance biodiversity. The preferred option will provide more opportunities for mitigation measures within proposals of new developments which may encourage investment in the areas yet to be developed.
Policy NE4: Flood Risk.	Alternative 1: Specify the level of reduction in surface water run-off required in certain instances, e.g. 50%.	Due to the variety in topography in the Legacy Corporation area and the costs that developers could therefore incur by stipulating such a reduction, there is a risk that this would make certain sites and schemes undeliverable. As a result, whilst stipulating a reduction in surface water run-off and appropriate flood risk management measures, the option chosen is seen as favourable.	Depending on the location of the site the preferred option would provide more flexibility for developers to implement flood risk mitigation measures. Therefore it is considered that the preferred option is more likely to encourage investment in new residential developments and performs well against housing and economic SA objectives without detracting from flood risk SA objectives 12 and 13.
Policy NE5: Biodiversity	Alternative 1: State the importance of not breaking any existing habitat, rather than outlining the importance of not breaking any existing wildlife corridor.	Due to the context of the LLDC area, where different habitats join and evolve to form unique and significant wildlife corridors through the area and East London, and in support of the Strategic Policy for achieving an effective series of Green Grid	The preferred option performs well against biodiversity SA objective 9 as it ensures that both important wildlife corridors and valuable habitats are protected. In that sense the preferred option would

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
		and Blue Ribbon networks, it was decided that it is important to emphasise both the protection of wildlife corridors and habitats.	more strongly support the achievement of the SA objective.
Policy NE9: Metropolitan Open Land	Alternative 1: When defining the area of MOL on the Policies Map replicate the areas of MOL already designated within borough Local Plans.	Reviewing the areas identified as MOL based on the London Plan policy criteria and identifying new areas was chosen as a preferred option as the area appropriate for MOL designation has been increased due to the introduction of the Queen Elizabeth Olympic Park.	The preferred option performs well against health biodiversity and townscape SA objectives (3, 9, and 10) with some indirect beneficial effects on reducing the flood risk in area and improving the air quality in the long term. The preferred option is considered to be more sustainable than the alternative due to the increased size of designated Metropolitan Open Land.
Policy NE10: Local Open Space	Alternative 1: Only designating Local Open Spaces that already have some form of local protection in existing plans.	The level of change in the area has resulted in the delivery of new appropriate open spaces.	Same as above.
Policy NE12: Play Space	Alternative 1: Focus solely on playgrounds or playing fields, with the policy relating specifically to these sites.	This would not to capitalise on the opportunities for play across the public realm and not make use of the variety of open spaces where play can be encouraged.	There would be no significant difference between the alternative and the preferred option with regards to performance against SA objectives. Alternative 1 would result in similar effects as the Preferred Option. The alternative is more narrowly focused on formal play areas and not on other areas of public open space. Therefore, there may be slightly lower benefits in terms of health and access to amenities.
Strategic Policy SP7: Transport and Connectivity	Alternative 1: Support more suburban scale of development with more space provided for private cars.	This was considered not to capitalise on the areas connectivity by not making use of the high public transport capacity. It would also be difficult to accommodate such an increase in the volume of private cars on the surrounding road network.	The preferred option will have positive effects on the SA Objective 5 – to improve sustainable access to jobs, basic goods, services and amenities for all groups. In addition, it will contribute indirectly to the achievement of SA objective 14 (air quality) as it will encourage people to use already well developed public transport network in the area and reduce the need to travel by private car.
Policy T2: Strategic Transport Improvements	Alternative 1: Not having a policy seeking to secure stopping international trains, a rail link to High Speed 2 or improved	These Strategic Transport Improvements are considered necessary to make Stratford and an even better place to work, live and invest.	The preferred option performs very well against economic and employment SA objectives (7 and 8) as well as sustainable access SA objective 5 as it

Preferred Policy option	Alternatives not selected	Reasons why not selected	SA Comments
	connections to airports		encourages business development and investment and will reduce the overall deprivation levels in the area in the long term.
Policy T3: Parking and Parking Standards	<p>Alternative 1: Adopt the existing borough standards for the corresponding parts of the LLDC area.</p> <p>Alternative 2: Develop separate LLDC specific standards without reference to the London Plan.</p>	<p>Impractical within such a small area, and the wider boroughs standards may not necessarily be reflective of the character of the smaller individual parts of the LLDC area.</p> <p>Following the London Plan standards with a criteria based policy which adapts it to local circumstances was a sensible one given the small size of the LLDC area and would meet the objectives of having parking provided to standards appropriate to the scale, type and location of development.</p>	There would be no significant difference between the alternative and the preferred option with regards to performance against the SA objectives. The preferred option performs slightly better against SA objective 5 as parking standards will be tailored to local needs and circumstances.

3.3 Alternative Options Sub Areas/Site Allocations

Alternative options were also considered with regards to the identified four Sub Areas in the Local Plan and a number of Site allocations within these Sub Areas. It was recognised that certain limitations exist for considering more alternatives with regards to the proposed Sub Areas and Site Allocations as planning permissions have already been granted for the majority of sites. Details on the preferred options and alternatives of the four Sub Areas and Site Allocations are provided in Appendix D, as well as the reasons why the alternatives were not chosen. Where an alternative option to the Sub Area policy/site allocation was considered, the performance of the preferred option and alternative were assessed against the SA objectives using the sustainability matrix in Appendix G. Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

A summary of the sustainability appraisal results of the preferred and alternative options is provided in the following sections.

Sub Area 1

No specific alternatives for the Sub Area Vision were considered as these were explored and discounted through the AAP preparation process in line with consultation responses, evidence and sustainability appraisal. The Legacy Corporation's vision for Sub Area 1 refines this already established approach.

The only alternative option within the Sub Area policies is related to Policy SA1.4 Heritage-led Regeneration where an alternative option would be to encourage purely residential or employment-led regeneration. However, it was considered more appropriate that no one use should predominate in the Sub Area in accordance with other policies in the Local Plan.

Sustainability Comments: The preferred option performs particularly well against SA objectives 10 and 11 relating to the enhancement of townscape quality and protection of cultural heritage. Alternative 1 is less likely to contribute to SA objectives 10 and 11 because purely housing-led or employment-led approach may result in loss of the distinct sense of place of the area.

Each proposed site allocation in Sub Area 1 was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

Sub Area 2

Given the high level of certainty of delivery of the permitted development in the area no realistic alternative options were available for consideration. The permitted schemes are outline parameters based applications that set the limit of development extent and height, allowing sufficient flexibility in the final form for it.

Sustainability Comments: Each proposed site allocation in Sub Area 2 was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

Sub Area 3

An alternative option for the Sub Area 3 Vision was not to propose the extension of the existing town centre which would encompass the retail, leisure and commercial district of Westfield Stratford. It was discounted as this would weaken the case for Stratford as a whole being defined as a Metropolitan Centre within the London Plan. It would also weaken the case for improving links between these locations and the areas of Stratford outside of the Legacy Corporation area.

Sustainability comments: The preferred option is in accordance with other policies previously considered in the Local Plan. The alternative option is less likely to contribute to the economic objectives because it offers fewer employment and retail opportunities within the LLDC area.

Promoting only residential and subsidiary uses within the Sub Area was an alternative option for policy SA3.2 Cultural and Education facilities. The alternative was discounted as it was considered that it would not reflect the overall vision and strategy set out within the Local Plan and would not maximise the economic growth element of that strategy.

Sustainability comments: The alternative option performs well against SA objective 4 because it sets out a housing led approach to growth. However, the preferred option would contribute to the achievement of more SA objectives as it is likely to result in positive effects with regards to health, education, and overall deprivation levels.

An alternative option of not permitting interim uses of land (SA3.3: Interim Leisure, Cultural and Event Uses) has been discounted as this will risk the land being unutilised and provide a poor quality and unattractive environment along key routes in the area.

Sustainability comments: The alternative option may result in some negative effects with regards to the economic SA objectives as the land would be underutilised and is likely to create an unattractive business environment prior to the delivery of later phases of permanent development.

Site Allocations

Within the Site Allocations included in Sub Area 3 the following alternatives were considered and rejected in the assessment process:

- Chobham Farm South: The alternative option of allocating the site for development without the completion of a link to the town centre bridge was rejected as this link will help to improve access and the range of options for acceptable forms of development.

Sustainability comments: The preferred option performs well against SA objective 5 related to sustainable access to amenities for all groups. The alternative option is less likely to contribute to the achievement of the economic SA objectives because it provides limited opportunities for development of the site thus attracting less investment in the area. Moreover, it may result in worsening of the deprivation levels due to restricted access to amenities.

- Stratford Waterfront East (PDZ1): The option of only reflecting the approved form of development in this location, with no additional flexibility was discounted as the provision of greater flexibility provides an opportunity for accommodating specific significant proposals within the final form of development that could contribute to the wider economic and culturally significant role of this location (i.e. the retained Olympic Venues and Parkland).

Sustainability comments: The preferred option performs well against SA objective 3 and 4 related to health benefits and housing supply. In addition, the preferred option is more likely to contribute to the achievement of the economic SA objectives through the flexible option to introduce conference centre, institutional or educational uses on the site.

- Rick Roberts Way: The alternative of only reflecting the Legacy Communities Scheme permitted floorspace scenario was discounted as the identification of the Gas Holder site opens the potential for a wider and more comprehensive development scenario. It also reflects the flexibility of location for the school that is built into the Legacy Communities Scheme Planning Permission.

Sustainability comments: The preferred option performs well against SA objectives 2, 3 and 4 related to an improved education attainment, health benefits and housing supply. In addition,

some positive effects on biodiversity are likely to occur through the remediation of contaminated land in the south section of the area. The alternative will result in similar effects as the preferred option with unknown performance against SA objective 9 (biodiversity) as it is unclear from the description whether the contaminated land will be remediated in the long term. It would be beneficial to include more information about the potential access to amenities from the surrounding areas.

Sub Area 4

No specific alternatives were considered with regards to the Sub Area policies as these were explored and discounted through the Core Strategy preparation process in line with consultation responses, evidence and sustainability appraisal. The Legacy Corporation's vision for Sub Area 4 updates this already established approach.

Sustainability Comments: Each proposed site allocation was recognised as an alternative to the rest but none of the site allocations have been rejected at this stage of the planning process.

3.4 Appraisal of the 'No Plan' / 'Business as Usual' Option

An option representing a 'No Plan' / 'Business as Usual' approach was also subject to the SA process as the comparison of options to a 'No Plan' / 'Business as Usual' situation is a requirement of the SEA Directive and some of the suggested alternative options include 'no policy' alternative (See Appendix D).

In the absence of more detailed LLDC specific policy, there is likely to be much greater uncertainty over requirements that proposals for new development will need to address. Whilst the Core Strategies, Land Allocations DPDs and AAPs of the four London Local Authorities would provide a significant guidance to development types and locations, there is a need to ensure that policy is consistent and up to date across the LLDC area as a whole to provide certainty about how development should be designed (as provided through the Local Plan).

There would therefore be a greater likelihood of development being less sustainable and of adverse environmental, social or economic effects occurring. Whilst the Core Strategy and Land Allocations DPDs should help direct inappropriate development away from environmentally sensitive locations, the Local Plan has a key role to play in, for example, micro-sitting, the scale or form of development, energy and materials use, the appearance of structures, parking, access to sustainable transport, the impact on local environmental and built heritage features amongst a number of other issues. In particular, without a consistent set of planning guidance in this form, there would be a greater likelihood of a number of smaller adverse effects occurring which could lead to greater overall cumulative effects.

Similarly, there would be a lower likelihood of opportunities being met in order to alleviate the area's existing social and economic issues. For example, there would be less guidance on the type of housing that should be developed to meet identified needs, or on measures to help improve the sustainable access to community facilities.

It is also likely that the planning and consenting process would be slower given that decisions would need to rely more upon a wider suite of policy and guidance where it is available (e.g. national, regional, international).

4 APPRAISAL OF THE LOCAL PLAN

4.1 Introduction

This section outlines the results of the appraisal of the Local Plan including details of mitigation measures that could be implemented to improve the performance of the plan.

4.2 Appraisal of the Vision for the Legacy Corporation Area

The LLDC Local Plan contains a Vision that indicates how the borough will look in 2031. The Vision comprises:

Creating Jobs and Communities

Centred around the Queen Elizabeth Olympic Park, the Legacy Corporation area will become a new piece of London, a series of well-connected neighbourhoods which tie their surrounding areas together and provide a focus for development that will bring economic growth, new jobs and new homes in a well-designed built environment that is accessible to and useable by all. The legacy of infrastructure, restored waterways and well-designed open spaces will underline the environmental quality that sets the scene for sustainable growth in economic activity and delivery of new homes. This will enable local communities to develop, grow and integrate, providing a platform for community innovation and enterprise.

As one of London's most dynamic and unique urban districts the Legacy Corporation area will provide major cultural and leisure attractions, including world class sporting venues that reinforce its role as a location of choice for business and for current and new residents.

The area will provide the opportunity for a range of business, of local and international importance, to locate in high quality premises with plentiful and excellent local through to international transport links. It will also offer a range of high quality education opportunities and facilities, from early years to higher education and research, meeting the needs and aspirations of local communities and those of London and beyond.

In addition to excellent education, health and other community infrastructure being available within the area, development will have driven an improvement in the quality and accessibility of the existing local environment and contributed to the mitigation of climate change through delivery of sustainable buildings and open spaces, the availability of locally generated heat and power and the high level of accessibility to public transport, local shops and services.

Taken together, the many aspects of the Legacy Corporation area will make a substantial contribution to enabling residents in wider east London to achieve, at least the London average in the quality of life expected for successful London communities.

4.2.1 Results of the SA of the Vision

There is an emphasis within the Vision to create 'a series of well-connected neighbourhoods' that 'bring economic growth, new jobs and new homes' which would positively fulfil many of the social and economic SA Objectives, as creating such a place would improve local housing, encourage economic growth and increase employment opportunities. This would be particularly

beneficial for surrounding areas which currently suffer with elevated levels of deprivation. Levels of deprivation would further benefit from provision of high quality education opportunities and facilities, from early years to higher education and research within the LLDC area. Ultimately the creation of neighbourhoods would also contribute to creating happy and healthy communities. However, the Vision does not specifically mention that affordable housing will form part of new residential development which has been identified as a specific need in the area.

The Vision affirms that the LLDC area is one of London's most dynamic and unique urban districts that will provide cultural and leisure attractions, along with world class sporting venues. This would not only benefit economic growth in the LLDC area but would also offer health benefits and facilitate much needed general regeneration of surrounding areas.

Climate change would also benefit under the Vision through promoting adjacency of homes and jobs along with a commitment to maximise connectivity of the LLDC area with surrounding areas through sustainable transport links. This may also encourage a model shift encouraging people to leave their private cars at home and opt for a more sustainable travel choice i.e. walking, cycling or taking the train to access the LLDC area.

With regards to the environment (other than mitigation against climate change) the Vision seeks to ensure that the LLDC area provides a well-designed built environment that is readily accessible and provides areas of open space. However, it does not explicitly mention the need to protect and enhance the natural environment such as watercourses, wildlife sites (or local wildlife) and other Green Infrastructure. In addition the Vision does not specifically mention the need to protect the historic environment (including heritage assets), a need to protect and enhance townscape character and quality (although this is indirectly inferred to) or protect and enhance the quality of water features and resources.

4.2.2 Recommendations and Mitigation Potential

It is recommended that the Vision is amended to ensure the following:

- The Vision could be strengthened to ensure it includes a commitment to ensuring an element of affordable housing is provided within the LLDC area i.e. 'provide a focus for development that will bring economic growth, new jobs and new homes (*including an element of affordable homes*) in a well-designed built environment'. However, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.
- There should also be a clear commitment within the Vision to the protection and enhancement of biodiversity resources, heritage assets and townscape character and quality. However, as above, it is recognised this need is provided within the Objectives and that the Local Plan should be read as a whole.

4.3 Appraisal of the Objectives

The Local Plan contains 14 Objectives to deliver the Vision outlined in the section above. They comprise:

- 1. Business growth:** secure provision of a significant range of types and sizes of work space to enable a range of businesses to locate, develop and expand within the Legacy Corporation Area, with significant business hubs developing in particular locations within the Plan period, providing a platform for community innovation and enterprise, while maximising the opportunities provided to utilise the Queen Elizabeth Olympic Park and transformed Olympic venues as an international visitor attraction that will support business growth across the area.

2. **Jobs:** secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.
3. **Housing:** secure a wide range of housing types, including a significant element of family homes through the development of suitable sites within the Legacy Corporation area that are affordable for those on a wide spectrum of incomes, balancing the aspirations of new communities and helping to meet the housing need generated in the surrounding areas and more widely across London.
4. **Education:** secure provision of excellent education facilities and opportunities, ranging from nursery and early years to Further and Higher Education, including employment skills and training, within the Legacy Corporation Area that meet the needs and aspirations of its population and contribute to meeting the education and training needs of the population in surrounding areas.
5. **Health Culture and wellbeing,** seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games and a strong sense of cultural wellbeing through participation in recreation, creative and cultural activities .
6. **Urban Design & Design Quality:** achieve an excellent quality of design for new buildings and within the wider urban landscape, including streets and public spaces and other open spaces, maintaining and, where necessary, improving the quality of those spaces, with a focus on the character of the location and its integration and connections with its surroundings.
7. **Creating inclusive places:** seek to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.
8. **Creating Neighbourhoods:** to expand existing and create new neighbourhoods which are good places to live and work and provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.
9. **Area characters and the historic environment:** To create a new piece of London comprising of distinctive neighbourhoods, which draw upon the existing character of established areas, including their cultural assets, and respect the historic aspects of the built environment, particularly where there are conservation areas, and nationally and locally listed buildings.
10. **Sustainability:** to draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.
11. **Climate change and energy:** contribute to the Mayor's target of achieving "an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025"⁵, by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.

⁵ London Plan (July 2011), Policy 5.1 Climate Change Mitigation

- 12. Open space and biodiversity:** using the open space, waterways and biodiversity legacy of the Queen Elizabeth Olympic Park to tie the area effectively into the London Green and Blue Grids, protecting and seeking enhancement of identified locations.
- 13. Transport and Connectivity:** seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.
- 14. Convergence:** contribute to meeting the aims of the Convergence Objectives of:
- Creating wealth and reducing poverty;
 - Supporting healthier lifestyles; and
 - Developing successful neighbourhoods.

4.3.1 Results of the SA of the Objectives

Table 4-1 presents the compatibility of the Local Plan Objectives against the SA Objectives.

Table 4-1 Compatibility of the SA Objectives and the Objectives

SA Objectives	LLDC Local Plan Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
1 To reduce crime, disorder and fear of crime	✓	✓	✓	✓	0	✓	0	✓	0	✓	0	0	0	✓
2 To improve levels of educational attainment for all age groups and all sectors of society	✓	✓	0	✓	0	0	0	0	0	✓	0	0	✓	✓
3 To improve physical and mental health and wellbeing for all and reduce health inequalities	0	0	✓	✓	✓	✓	✓	✓	✓	✓	0	✓	✓	✓
4 To ensure housing provision meets local needs	0	0	✓	0	✓	0	0	✓	0	✓	0	0	0	✓
5 To improve sustainable access to jobs, basic goods, services and amenities for all groups	✓	✓	✓	0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6 To reduce poverty and social exclusion whilst promoting social inclusiveness and equality	✓	✓	✓	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓
7 To encourage sustainable economic growth, inclusion and business development	✓	✓	0	✓	✓	✓	0	✓	0	✓	✓	✓	✓	✓

SA Objectives	LLDC Local Plan Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
8 To increase employment opportunities for all residents in the local area	✓	✓	0	✓	✓	0	0	✓	0	✓	0	0	✓	✓
9 To protect and enhance biodiversity	?	0	?	0	✓	✓	0	0	0	✓	0	✓	✓	0
10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	?	0	?	0	✓	✓	?	✓	✓	✓	0	✓	✓	0
11 To protect and enhance the cultural heritage resource	?	0	?	0	✓	✓	0	0	✓	✓	0	0	0	0
12 To protect and enhance the quality of water features and resources and reduce the risk of flooding	✗	0	✗	0	0	0	0	0	0	✓	0	✓	0	0
13 To limit and adapt to climate change	✗	✓	✗	0	0	✓	0	✓	0	✓	✓	0	✓	0
14 To protect and improve air quality	?	✓	?	0	0	✓	0	✓	0	✓	✓	0	✓	0
15 To ensure sustainable use of natural resources	?	0	?	0	0	0	0	0	0	✓	0	0	0	0

Key

✓ = Objectives are compatible

✗ = Objectives are potentially incompatible

0 = There is no link between Objectives

? = The link between the objectives is uncertain

Sustainability Comments

Each of the Objectives was assessed against the SA Objectives in a compatibility matrix to determine their compatibility and to identify any potential areas where new Objectives need to be established or the existing ones clarified.

On the whole the Objectives and the SA Objectives were either compatible or no links between the Objectives could be established. However, a number of potential conflicts were identified relating to Objectives a 'business growth' and c 'housing'. This was because business growth within the LLDC area and housing growth would both increase water consumption and may also exacerbate current flood risk issues.

In addition to areas of potential conflict, some areas of uncertainty were also identified against Objectives 1 - 'business growth' and 3 - 'housing' against the following SA Objectives:

- SA Objective 9 'To protect and enhance biodiversity';
- SA Objective 10 'To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)';
- SA Objective 11 'To protect and enhance the cultural heritage resource';
- SA Objective 14 'To protect and improve air quality'; and
- SA Objective 15 'To ensure sustainable use of natural resources'.

Compatibility was assessed as uncertain, as business growth and new housing have the potential to lead to adverse effects on biodiversity resources, townscape character and quality, heritage assets, increase traffic movement if not appropriately developed and an increase in the use of natural resources and waste production. However, the Objectives should be read as a whole and not individually, therefore biodiversity, heritage assets, townscape resources and air quality would all be protected through other Objectives. Objective 10 'Sustainability', although not explicitly mentioned may also ensure business growth and new housing development minimises natural resource use and maximises opportunities to reduce waste production.

4.3.2 Recommendations and Mitigation Potential

It is recommended that the Objectives are amended to ensure the following:

- Within the Objective there is no clear commitment to ensuring SuDS are incorporated into new development to ensure flood risk within the LLDC area is not exacerbated nor is there specific reference to minimising the use of water resources. It is therefore recommended that these elements are incorporated into the Objectives.
- In addition, there should be a clear commitment that business growth and new housing development minimises the use of natural resource use and maximises opportunities to reduce waste production.

4.4 Assessment of Policies

The LLDC Local Plan contains a series of Strategic and Detailed Policies designed to guide development in the LLDC area. Table 4-2 presents the groups of policies that have been assessed.

Table 4-2 Strategic and Detailed Policies of the LLDC Local Plan

Strategic and Detailed Policies	
SP1: Business, Economy and Employment	BEE1 Business & Employment hubs
	BEE2 Strategic Industrial Land
	BEE3 Locally Significant Industrial Sites and Other Industrial Locations
	BEE4 Employment uses in other locations
	BEE5 Mixed use locations
	BEE6 Managed and affordable workspace
	BEE7 Town, Neighbourhood and Local Centres
	BEE8 Retail and commercial uses outside of designated centres

Strategic and Detailed Policies	
	BEE9 Jobs and skills and employment training
	BEE10 Higher Education, Research and Development
	BEE11 Schools
SP2 Housing	H1 Housing Provision
	H2 Residential Development Principles including Alterations and extensions
	H3 Affordable Housing
	H4 Specialist Housing needs
	H5 Houses in Multiple Occupation (HMO)
	H6 Institutional investment in the Private Rented Sector
SP3: The Built Environment	HBE1 Designating Protected Views
SP4: The Historic Environment	HBE2 Inclusive Design
	HBE3 Designating Conservation Areas
	HBE4 Local Listing
	HBE5 Archaeology
	HBE6 Local Identity
	HBE7 Energy Hierarchy
	HBE8 Sustainable Design and Construction
SP5: Infrastructure to Support Growth and Convergence	IN1 New and Existing Community Infrastructure
	IN2 Energy Infrastructure and heat networks
	IN3 Water Supply and Sewerage Infrastructure
	IN4 Waste Management
SP6: The Natural Environment	NE1 Integrating the built and natural environment
	NE2 The natural environment and Health and Well-being
	NE3 The Waterways
	NE4 Flood Risk
	NE5 Biodiversity
	NE6 Land Quality and Contaminated Land
	NE7 Air Quality
	NE8 The All London Green Grid
	NE9 Metropolitan Open Land (MOL)
	NE10 Local Open Space
	NE11 Parks and Parklands
	NE12 Play Space
SP7: Transport and	T1 Local Connectivity

Strategic and Detailed Policies	
Connectivity	T2 Strategic Transport improvements
	T3 Parking and Parking Standards
	T4 Provision for pedestrians and cyclists
	T5 Transport Assessments and Travel Plans
	T6: Road Hierarchy
	T7 Transport Improvements
	T8 Supporting Transport Schemes
	T9 The Transport function of the Waterways

Each of the Policies was assessed against the SA Objectives using the appraisal matrix Table 2-5 to identify any significant adverse or beneficial effects. The more detailed appraisal of the Policies is included in Appendix F and the summary of the sustainability comments is provided in the section below.

4.4.1 Sustainability comments

On the whole the majority of policies contribute to the achievement of the SA Objectives. However, a number of policies were identified to detract from the SA Objectives with potential to have a negative effect if no mitigation measures are put in place.

The policies relating to Business, Economy and Employment perform very well against the sustainability criteria used in the appraisal and would lead to both direct and indirect benefits. Direct benefits would occur in relation to improved employment opportunities, economic inclusion, long-term economic benefits and an improved education attainment for all age groups. Other indirect benefits will occur as a result of the creation of improved public realms attracting more visitors, residents and businesses, which could indirectly benefit crime and health, and also reduction in carbon emissions in the long-term through the promotion of mixed use developments. Indirect benefits in terms of greenhouse gas emissions and air quality could also be realised through the implementation of travel plans for new schools and by focussing new leisure facilities in locations where public transport is available.

The greatest sustainability benefits within this topic area of the Local Plan relate to economic development in appropriate locations within the LLDC area, thereby generating employment opportunities and supporting existing services and facilities (as promoted through the employment requirements policies). This could generate indirect benefits in terms of incomes and health.

The housing policies directly seek to ensure the provision of a range of housing types including affordable housing, ensuring both market and affordable housing needs are met, which could indirectly encourage inward investment and economic growth. Many of the policies seek to ensure access to services including by public transport. It is ensured that the needs of specific sectors of the community such as older people and students are met, which could provide indirect benefits for their health and well-being. Gypsy and traveller sites provision is also catered for.

The built environment policies positively support many of the environmental sustainability criteria, particularly through the requirement for the sustainable design construction of new developments, maximising energy efficiency, and utilising low carbon technologies. The

policies therefore directly seek to reduce carbon emissions and ensure adaptation to climate change, and indirectly contribute to a reduction in the use of natural resources and waste generation. The policies also seek to ensure that new development is well connected to other amenities and facilities, is well integrated with the existing townscape, and does not have adverse impacts on (and where possible improves) the quality of the built and natural environment. Such provisions can offer a number of social and economic benefits, for example relating to accessible jobs and encouraging inward investment. In addition, encouraging the use of public transport, walking and cycling are also beneficial by providing opportunities for individuals to pursue healthy lifestyles. The policies clearly require the design of new development to take account of existing environmental assets and reflect local townscape.

The historic environment related policies clearly provide for significant protection of the area's heritage assets and their settings, which can also benefit townscape character. The preservation of heritage assets can also encourage additional residents, employees and tourists, and act as an important learning resource.

The policy seeking to protect community infrastructure and services ensures that facilities and infrastructure are available to cope with the demand that new development will generate, water, waste and energy infrastructure could all help contribute to the long-term sustainability of the LLDC area. The energy enhancing policy contributes positively to the sustainability criteria used in the appraisal through the promotion renewable energy generation, which could generate indirect benefits to the local economy.

The policies relating to integrated water management focus upon protecting the area's water resources, and ensuring that flood risk is effectively managed as part of the development process. The protection of water quality is particularly important as there are a number of rivers across the LLDC area (Waterworks River, River Lee, River Roding) and there are flood risk issues associated with some localised areas that fall within Flood Zone 2 and 3. Flooding can have significant adverse effects on the economy and human health and wellbeing by affecting homes, buildings and services, and resulting in significant remedial costs. These policies would therefore indirectly benefit the local economy by reducing the risk of flooding pressure on the district's economy and services.

The policies relating to green infrastructure seek to ensure the existing green infrastructure network of the LLDC area is protected, which would indirectly benefit health and wellbeing. There is also potential for green spaces such as allotments to be used to promote healthy lifestyles and eating, as well as educational benefits. In addition, green infrastructure can be important green travel links (cycle routes) and enhancing these links across the LLDC area could help contribute to greater levels of walking and cycling which would have air quality, climate change as well as health benefits in the long-term. Positive environmental impacts upon water resources, soil resources, biodiversity and townscape should also occur if the policies were implemented.

The policies relating to the connectivity across the LLDC area positively contribute a number of sustainability criteria (e.g. health, access, economy, air quality) by ensuring local services are located in areas where there is a choice of travel options (walking, cycling and public transport) and are accessible to all. Whilst the focus of this policy is not upon environmental issues, by ensuring that new services are well located in relation to existing centres, it may help to reduce the number of journeys made by car which could indirectly benefit air quality (although this depends upon the travel choices of individuals). Sustainable transport links would also improve access to existing services and facilities, and would encourage economic development and inclusion.

4.4.2 Recommendations and Mitigation Potential

It is recommended that the Policies are amended to ensure the following:

- Within the housing policies there is no clear commitment to ensuring SuDS are incorporated into new development to ensure flood risk within the LLDC area is not exacerbated nor is there specific reference to minimising the use of water resources. It is therefore recommended that these elements are incorporated into the policies.
- Safety by design principles should also be incorporated into the housing policies to ensure that crime levels do not increase as a result of the planned growth of the area and the influx of a significant number of new residents.
- There should be a clear commitment that business growth and new housing and infrastructure developments minimise the use of natural resources and maximises opportunities to reduce waste production.
- It would be beneficial if the water management policy is more explicit about the main use of the waterways as that will determine the potential effects on biodiversity throughout the plan period.
- Renewable energy infrastructure should be more explicitly promoted where appropriate to mitigate the effect of increased energy demand related to the planned level of growth.
- The LLDC area is largely located within an Area of Archaeological Importance. Therefore it is likely that major infrastructure works will have an adverse effect on archaeological resources. Detailed impact assessment of Cultural heritage assets may be required before any construction works commence.
- The Local plan includes a policy which ensures that there is no loss of any waste management facilities but does not include measures to reduce waste sent to landfill. Currently a high percentage of the waste in the area goes to landfill and landfill waste is a large source of anthropogenic methane. Reuse, recycle or compost of materials should be encouraged.

4.5 Assessment of Sub Areas and Site Allocations

The Local Plan identifies four Sub Areas for future development within the boundaries of the LLDC area. Each Sub Area description includes details of the opportunities for change, as well as the infrastructure needed to support growth. The Vision, policies and site allocations relating to each Sub Area were assessed against the SA Objectives using the appraisal matrix Table 2-5 to identify any significant adverse or beneficial effects. The more detailed appraisal of the Sub Areas is included in Appendix G and a summary table is provided in Table 4-3 below.

Table 4-3 Summary Appraisal Sub Areas and Site Allocations

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
1 To reduce crime, disorder and fear of crime	+/-	-	-	-	0	0	0	0	+	+	0	0	0	+/-	0	0	0	0	0	0	+/-	+/-	+/-	0
2 To improve levels of educational attainment for all age groups and all sectors of society	+/-	+	+	+/-	0	0	0	0	+	+	0	0	0	0	?	?	?	+	0	+	+/-	0	0	+
3 To improve physical and mental health and wellbeing for all and reduce health inequalities	+	+	+	+	0	0	0	0	+	+	+	+	+	0	0	+	+	+	+/-	+	+	+	+	0
4 To ensure housing provision meets local needs	+	++	++	++	+/-	+/-	0	+	0	0	++	++	++	+	+	+	+	0	+	+	++	++	++	0
5 To improve sustainable access to jobs, basic goods, services and amenities for all groups	+	+	+	+	0	0	0	0	+	+	0	0	0	0	++	?	?	+	+	?	+	+	+	0
6 To reduce poverty and social exclusion whilst promoting social	+	+	+	+	+	+	0	0	+	+	0	0	0	0	+	+	+	+	0	+	+	+	+	0

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
inclusiveness and equality																								
7 To encourage sustainable economic growth, inclusion and business development	+	+	+	+	+	+	+	0	+	+	0	0	0	+	0	+	0	0	0	0	+	++	+	0
8 To increase employment opportunities for all residents in the local area	+	+	+	+	+	+	+	0	+	+	0	0	0	+	0	+	0	0	0	+	+	+	+	0
9 To protect and enhance biodiversity	+/-	+/-	+/-	+/-	0	0	0	0	+/-	+/-	0	0	0	+/-	0	+/-	+/-	0	+/-	+	0	0	+	0
10 To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	0	0	0	0	0	0	0	0	+/-	+/-	0	0	0	0	0	+	+	+	0	0	0	++	0	++
11 To protect and enhance the cultural heritage resource	0	0	0	?	0	0	0	0	+/-	+/-	0	0	0	0	0	0	0	0	0	0	0	0	0	++

SA Objectives	LLDC Local Plan Sub Areas and Site Allocations																							
	Sub Areas				Site allocations																			
	1	2	3	4	Sweetwater	East wick and iCity	Neighbourhood centre	Chapman Road	Fish Island South	Fish Island North	Chobham Farm	East Village	Chobham Manor	Stratford Town Centre Extension	Chobham Farm South	Stratford Waterfront East	Stratford Waterfront West	Greater Carpenter District	Bridgewater Road	Rick Roberts Way	Bromley-by-Bow	Pudding Mill	Sugar House Lane	Three Mills
12 To protect and enhance the quality of water features and resources and reduce the risk of flooding	+/-	-	-	-	0	0	0	0	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	0
13 To limit and adapt to climate change	+/-	+/-	+/-	+/-	0	0	0	0	0	0	0	0	0	0	0	+/-	+/-	+/-	+/-	?	+/-	+/-	+/-	0
14 To protect and improve air quality	+/-	+/-	+/-	+/-	0	0	0	0	-	-	0	0	0	0	0	+/-	+/-	+/-	+/-	0	+/-	+/-	+/-	0
15 To ensure sustainable use of natural resources	-	-	-	-	0	0	0	0	0	0	0	0	0	0	0	+/-	+/-	0	+/-	+/-	+/-	+/-	+/-	0

4.5.1 Sustainability comments

All four Sub Areas will have a positive contribution to meeting housing demands with planned housing growth of approximately 20 000 new residential units within the plan period. Along with the allocation of land for residential use, there is a significant floorspace allocated for employment and office use which will result in direct benefits in relation to improved employment opportunities, economic inclusion, and business development. Sub Area 3 provides the greatest opportunities to achieve the SA objectives relating to reduction of poverty and economic growth with the promotion of education and research facilities and the provision of retail and office space.

Positive effects are also identified with regards to enhancement of biodiversity and remediation of contaminated land in Sub Area 3 and 4. Although the four Sub Areas are already well-served by public transport, further transport infrastructure improvements will have a positive direct effect on access and connectivity across the LLDC area. Crime levels may increase with the influx of significant number of new residents in the short term; however the potential negative effects are likely to be reduced in the long term as increased employment opportunities will lead to improved living standard, with a positive effect on deprivation rates and reduction of crime.

The Sub Areas will also slightly improve overall levels of deprivation though providing new affordable decent housing, new essential facilities which are accessible via walking / cycling and the provision of some commercial / employment opportunities. The Olympic Stadium located in Sub Area 3 will provide a wide range of facilities which may encourage more sport activities thus reducing health inequalities. Further infrastructure improvements of roads, tube stations and bridges will improve the access of the expanding resident population to public transport. These opportunities will offer benefits to those from more deprived communities in the area. Townscape quality and local character will be protected through the implementation of policies relating to the height and density of new buildings and specific heritage-led regeneration policies.

Twenty site allocations were identified in the Local Plan and assessed against the SA objectives. On the whole, the majority of site allocations performed very well against housing and health objectives through the provision of a significant number of new homes and facilities to encourage healthy lifestyles. Positive effects are identified with regards to improvement of educational attainment in five site allocations through the provision of secondary school, library, and the conservation of existing heritage assets. At present there is uncertainty whether the potential to develop Chobham Farm South, Stratford Waterfront East, and Stratford Waterfront West with regards to education and research will be realised. Sustainable access and connectivity will be improved at half of the proposed sites which may result in further investment and economic benefits in these locations. However, there is limited information provided with regards to access issues and improvements for the rest of the sites with some uncertain/unknown potential effects against the SA objectives. Positive effects with regards to business and employment opportunities are identified at ten site allocations through the provision of employment/office/retail floorspace, new hotel, and a new District Centre.

Negative effects are primarily related with the close proximity of some sites in Sub Area 3 to water courses, with potential risks for flooding.

4.5.2 Recommendations and Mitigation Potential

It is recommended that the Sub Areas are amended to ensure the following:

- Increased energy demand from new developments may result in adverse effects caused by increase of greenhouse emissions. Achieving high levels (5 or 6) of the Code for

Sustainable Homes would serve to minimise any increase in carbon emissions associated with new development.

- Sustainable Drainage Systems (SuDS) to be incorporated into new development which can cope with future climate change issues.
- Although the LLDC area is considered to be very urban with few areas that provide valuable spaces for wildlife, the wetlands and rivers that cross the area provide habitat for species and where expanding neighbourhoods result in loss of habitat from landtake compensation measures should be sought.
- The expected increase in housing and residents will result in extensive use of resources during construction and in the long term during operation of the new developments. Reuse/recycle of materials must be sought where possible. Opportunities should be sought to reuse any vacant dwellings.

Additional information or reference to the relevant policy in the plan would provide more clarity on how the Sub Area / Site Allocation will contribute to the achievement of the SA objectives.

4.6 Delivery and Implementation

These policies relate to enforcement issues and how enforcement will be undertaken by the Legacy Corporation. They are, therefore, more procedural and enforcement has to be undertaken in line with prevailing legislation and guidance. For this reason they have not been formally assessed through the SA process.

4.7 Cumulative Effects

The SEA Directive requires that the assessment includes identification of cumulative and synergistic effects (where the combined effects are greater than the sum of their component parts).

The assessment of the policies has been undertaken in a manner which has enabled the cumulative effects of the policies to be assessed. This is important as none of the policies would ever be implemented in isolation and the plan has to be read as a whole. The LLDC Local Plan has been assessed for its individual impacts but there may be cumulative effects which could occur as a result of the policies being implemented. Potential positive cumulative effects include the following:

- Provision of better quality homes and diversity of housing types which will contribute to the long-term housing needs of the area.
- Increased business and employment opportunities.
- Improvement in educational attainment levels
- Improvement in health.
- Improvement in access to and provision of services and facilities.
- Provision of suitable open areas for recreation.
- Improvement of public realm through open spaces provision and regeneration.

However, potential adverse cumulative effects can result from growth and development contained in policies, which include:

- Increase in use of resources from water and energy consumption.
- Loss of habitats through landtake.
- Increase in landfill waste.

- Increase in road traffic in major roads and worsening of air quality from traffic generation and dust from construction activities.

5 MONITORING FRAMEWORK

5.1 Introduction

This section provides an outline monitoring framework and advice for monitoring the significant effects of implementing the Local Plan. Monitoring is an ongoing process integral to the implementation of the Local Plan, and can be used to:

- Determine the performance of the plan and its contribution to objectives and targets;
- Identify the performance of mitigation measures;
- Fill data gaps identified earlier in the SA process;
- Identify undesirable sustainability effects; and
- Confirm whether sustainability predictions were accurate.

5.2 Approach

The monitoring framework has been developed to measure the performance of the Local Plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives and indicators that were developed for the SA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The monitoring framework has been designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the SA, and where monitoring would enable preventative or mitigation measures to be taken.

There are numerous SA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated and the emerging trends will, therefore be important.

5.3 Proposed Monitoring Framework

Table 5-1 provides a framework for monitoring the effects of the LLDC Local Plan and determining whether the predicted sustainability effects are realised. The framework is structured using the SA Objectives and includes the following elements:

- The potentially significant impact that needs to be monitored or the area of uncertainty
- A suitable monitoring indicator

The impacts predicted in the SA will not be realised until development occurs through the LLDC Local Plan and other related planning documents (e.g. the Core Strategy and the Land Allocations DPD of each Local authority in the LLDC area). The monitoring framework presented in Table 5-1 can then be updated to include targets as and when they are developed.

Table 5-1 Monitoring Framework

Sustainability Objective	Significant Effect	Sustainable Development Indicator
To reduce crime, disorder and fear of crime	Increased crime rates due to increase of population in the short term.	Number of thefts/ crimes in the area per year.
To improve levels of educational attainment for all age groups and all sectors of society	Improved skills among working age residents.	Number and types of training programmes completed and jobs created. Qualifications of working age residents.
To improve physical and mental health and wellbeing for all and reduce health inequalities		Increase in community perception of being in "good health" from 2011 Census.
To ensure housing provision meets local needs	Increased housing development.	Number/percentage increase in new housing developments completed. Number of new build affordable dwellings completed as a percentage of total housing completions. Percentage of new homes built to Lifetime Homes standards.
To improve sustainable access to jobs, basic goods, services and amenities for all groups	Improved access to services and amenities Improved public transport and increased walking and cycling.	Index of multiple deprivation. Level and types of planning obligations relating to facilities provision received. Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre. Percentage of completed retail, office and leisure development in town centres. Number of new housing and business developments incorporating Green Travel Plans. Mode for journey to work. Number of passengers using rail and underground stations.
To reduce poverty and social exclusion whilst	Reduced social exclusion and inequalities deprivation, including	General Index of multiple

Sustainability Objective	Significant Effect	Sustainable Development Indicator
promoting social inclusiveness and equality	access to services and amenities.	deprivation. Overall satisfaction with local area.
To encourage sustainable economic growth, inclusion and business development	Increased investment in the LLDC area.	Increase in number of VAT registered businesses. Reduction in unemployment rates. Amount of land developed for employment by type.
To increase employment opportunities for all residents in the local area	Increased investment in the LLDC area.	Increase in number of VAT registered businesses. Reduction in unemployment rates. Amount of land developed for employment by type.
To protect and enhance biodiversity	Improvement in quality and provision of open spaces.	Amount of land provided as green infrastructure.
	Increased pressure on open spaces, biodiversity and habitats.	Change in extent (hectares) of priority habitats and species (number). Meeting BAP targets.
To protect and enhance townscape character and quality (including open space, public realm improvements and urban design)	Improved townscape and public realm.	Area of townscape considered of low quality. Percentage of residents who are satisfied with their neighbourhood. Percentage of eligible open spaces managed to green flag award standard. Percentage of people living within 200m of open space.
To protect and enhance the cultural heritage resource	Increased number of listing buildings 'at risk'. Potential impact on setting of listed buildings and Conservation Areas.	Number of heritage assets 'at risk'.

Sustainability Objective	Significant Effect	Sustainable Development Indicator
To protect and enhance the quality of water features and resources and reduce the risk of flooding	<p>Increased water use.</p> <p>Deterioration of the ecological and chemical quality of watercourses.</p>	<p>Number of new developments utilising SuDS and water re-use to minimise water consumption.</p> <p>Number of developments meeting Code for Sustainable Homes Level 5 or 6 Standards.</p> <p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.</p> <p>Water and Groundwater quality (EA)</p>
To limit and adapt to climate change	Increased resource use, waste generation and CO2 emissions	<p>Number of new developments with Code for Sustainable Homes level 5 or 6 and BREEAM 'excellent' rating.</p> <p>Number of properties within flood zones.</p> <p>Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.</p> <p>New housing developments incorporating SuDS.</p> <p>Renewable energy capacity installed by type.</p>
To protect and improve air quality	Reduced air quality.	<p>Exceedances of statutory targets.</p> <p>Number of AMQAs.</p>
To ensure sustainable use of natural resources	Increased resource use and waste generation.	<p>Percentage of housing on previously developed land.</p> <p>Number of used vacant buildings.</p> <p>Proportion of waste sent to landfill.</p>

6 NEXT STEPS

6.1 Next Stages in the SA Process

This Draft SA Report will be issued for consultation alongside the Local Plan to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, LLDC will review the feedback and revise the plan as appropriate. If significant amendments are made to the document, the SA Report may also need to be updated to reflect the assessment of these amendments prior to the Local Plan being adopted.

6.2 How to Comment

The Local Plan and the SA Report may be viewed at the address below:

London Legacy Development Corporation

Level 10, 1 Stratford Place

Montfichet Road

Olympic Park

London

E20 1EJ

Alternatively they can be viewed at LLDC's Planning website: TBC

Appendix A

Review of Plans, Programmes and Environmental Protection Objectives

Appendix B



Baseline Data

Vision and Objectives Options Appraisal

Alternative Options Policies and Sub Areas

Policy Options Sustainability Appraisal

Sustainability Appraisal Matrices Policies

Sustainability Appraisal Matrices Sub Areas and Site Allocations



London Legacy Development Corporation
Draft LLDC Local Plan Sustainability Appraisal
and Habitats Regulations Assessment
Habitats Regulations Assessment

Screening Report

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London Legacy Development Corporation

Draft LLDC Local Plan Sustainability Appraisal and Habitats Regulations Assessment

Habitats Regulations Assessment

Screening Report

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Report No	003-UA005031-UE21-D02-HRAScreenv2	
Date	08 October 2013	

This report has been prepared for London Legacy Development Corporation in accordance with the terms and conditions of appointment for Habitats Regulations Assessment. Hyder Consulting (UK) Limited (2212959) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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1 INTRODUCTION AND PURPOSE OF THIS REPORT

1.1 Introduction

The London Legacy Development Corporation (LLDC) became a planning authority on 1st October 2012, with a full range of planning powers to continue the work of the Olympic Park Legacy Company. These include the development control functions previously undertaken by the Olympic Delivery Authority (ODA), and the planning functions of the London Thames Gateway Development Corporation (LTGDC). The LLDC is responsible for the Queen Elizabeth Olympic Park and areas beyond, including the four London boroughs of Hackney, Newham, Tower Hamlets and Waltham Forest. As a planning authority, the LLDC is to prepare a Local Plan (hereafter referred to as the LLDC Local Plan).

Hyder Consulting have been appointed by the LLDC to undertake a Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) of the Draft LLDC Local Plan.

The LLDC Local Plan will play an important role in delivering social inclusion and convergence in one of the most deprived areas of the UK, transforming the Queen Elizabeth Park and its environs into sustainable and thriving neighbourhoods.

This Screening Report has been prepared by Hyder Consulting on behalf of LLDC as part of the statutory Habitats Regulations Assessment (HRA) of the Draft LLDC Local Plan (hereafter referred to as the Local Plan).

This report follows on from the Inception Report and the Scoping Report, which establish the methodological approach for the completion of the HRA for the Local Plan.

1.2 Purpose of this Report

This report is the first stage in the HRA process, commonly referred to as 'Screening'. It identifies whether or not the Local Plan is likely to result in significant effects upon one or more Natura 2000 sites (also known as 'European sites'), either alone or in-combination with other plans or programmes, and subsequently whether or not an Appropriate Assessment will be required. If an Appropriate Assessment is required, this document will outline its proposed scope. Further details on the HRA stages are provided in Section 3.

1.3 Background to the Habitats Regulations Assessment

Under Article 6 of EC Directive 92/43/EEC (the Habitats Directive), an assessment is required where a plan or project may give rise to significant effects upon any European sites. Within the LLDC boundary there are no European sites; however, it is considered there are three sites which form part of the Natura 2000 network that could potentially be affected by the Local Plan through an identified impact pathway (see Section 4 for further details).

Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SAC), designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPA), classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive

79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites), as well as potential SPAs (pSPAs), are also considered.

The requirements of the Habitats Directive are transposed into English and Welsh law by means of the Conservation of Habitats and Species Regulations 2010¹. In 2012, these Regulations were amended to transpose more clearly certain aspects of the Habitats Directive. No fundamental changes to the Regulations were made; however, they are now referred to as the Conservation of Habitats and Species (Amendment) Regulations 2012².

Paragraph 3 Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

Paragraph 4, Article 6 of the Habitats Directive states that:

'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'

The overarching aim of HRA is to determine, in view of a site's conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European site. If the Screening (the first stage of the process, see Section 3 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on a site's integrity.

1.4 Legislation and Guidance

This HRA Screening Report has drawn upon the following legislation and guidance:

- The Conservation of Habitats and Species (Amendment) Regulations 2012.
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC;

¹ SI 2010/490

² SI 2012/1927

- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC;
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- Draft Guidance for Plan Making Authorities in Wales - The Appraisal of Plans under the Habitats Directive. David Tyldesley and Associates for Countryside Council for Wales (CCW) Bangor (November 2009, revised April 2010 and September 2012).
- Revised Draft Guidance. The Habitats Regulations Assessment of Local Plan Documents. David Tyldesley and Associates for Natural England (2009).

2 INTRODUCTION TO THE LOCAL PLAN

2.1 Background and Purpose

In 2012, the LLDC was formed with its purpose being '*to promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence*'.

The Local Plan builds on previously adopted borough plans for the constituent parts of the LLDC area, and sets out the LLDC strategy for the sustainable development of its area as a whole. This includes the general amount, type and location of new development it considers could take place and the policies that applications for planning permission should conform to in order to meet these objectives.

The LLDC area is geographically well defined, bordered and divided by waterways, major roads and railway lines. While bringing four former east London boroughs together (Hackney, Tower Hamlets, Newham and Waltham Forest), the Local Plan also sub-divides the area into four to aid the detailed description of the strategy, policies and proposals for these areas in sufficient detail. The four sub areas are listed below and illustrated on Figure 1:

- Sub Area 1 - Hackney Wick and Fish Island
- Sub Area 2 – North Stratford and Eton Manor
- Sub Area 3 – Central and South Stratford and Queen Elizabeth Park South
- Sub Area 4 – Bromley-by-Bow, Three Mills and Pudding Mill.

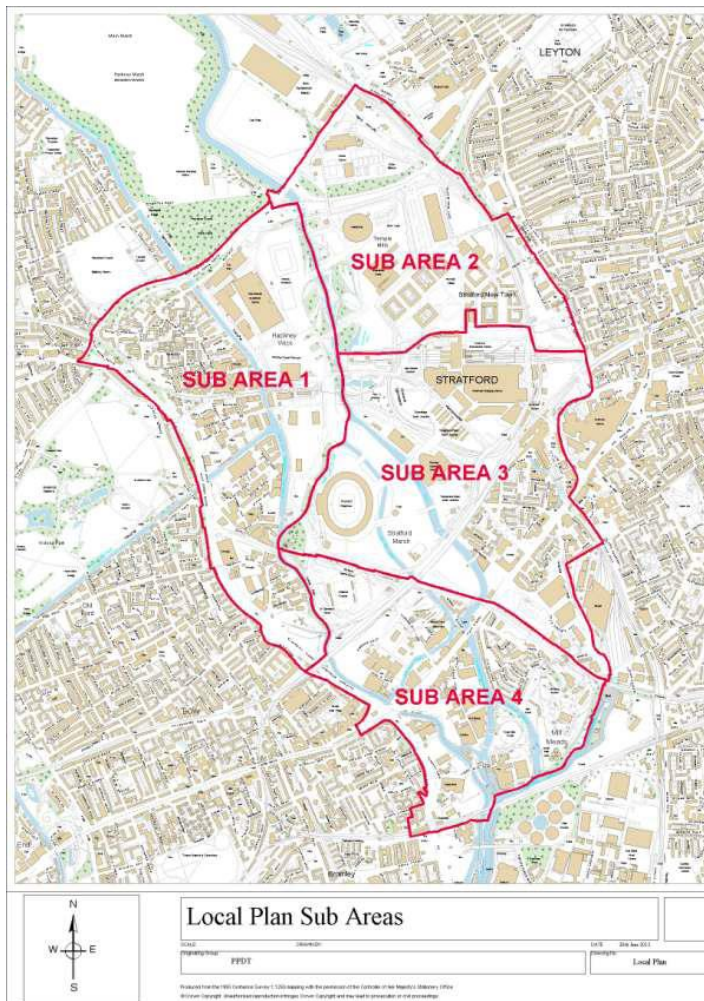


Figure 1: Local Plan Sub Areas

The LLDC area has a population of approximately 12,000 (based on 2011 census data). Compared to London as a whole, the area has lower levels of employment and economic activity, higher levels of people with no qualifications, and higher numbers of people with poor health.

The underlying key theme to the Local Plan is the principle of ‘convergence’, which is the ambition that over a twenty year period, residents of the then Host Boroughs (now ‘Growth Boroughs’) within the LLDC area will achieve the average expected in successful communities.

The area, in combination with much of its immediate surroundings, provides a significant land resource for meeting part of the need for housing and employment that will be generated by the projected growth of London within the London Plan period. The strategy for growth within the LLDC area is designed to meet a local need, whilst also providing a London-wide strategic resource within the context of the overall growth of London.

The Local Plan contains a Vision as well as a number of Objectives. These set out the direction of the approach to development and regeneration of the LLDC area and provide a framework to enable delivery of the planning policies, site allocations and sustainable growth. The objectives are set out in Section 2.2, below.

2.2 Objectives

In order to achieve the Vision for the area, fourteen objectives have been produced. They express the purpose of the Local Plan and are as follows:

Objective 1: Business growth

Objective 2: Jobs

Objective 3: Housing

Objective 4: Education

Objective 5: Health, culture and wellbeing

Objective 6: Urban design and design quality

Objective 7: Creating inclusive places

Objective 8: Creating neighbourhoods

Objective 9: Area characters and the historic environment

Objective 10: Sustainability

Objective 11: Climate change and energy

Objective 12: Open space and biodiversity

Objective 13: Transport and connectivity

Objective 14: Convergence

2.3 Strategic Policies

The vision and objectives set out the overall direction of the Local Plan. The Strategic Policies implement this vision. The policies are set out under a number of headings as follows:

- Business, Employment and Economy
- Housing
- Historic and Built Environment
- Infrastructure
- Natural Environment
- Transport and Connectivity

2.4 Policies within the LLDC Local Plan

The policies within the Local Plan are listed below:

Business, Economy and Employment

Strategic Policy SP1: Business, Economy and Employment

BEE1: Business and Employment hubs

BEE2: Strategic Industrial Land

BEE3: Locally Significant Industrial Sites and Other Industrial Locations

BEE4: Employment Uses in Other Locations

BEE5: Mixed Use Locations

BEE6: Managed and Affordable Workspace

BEE7: Town, Neighbourhood and Local Centres

BEE8: Retail and Commercial Uses Outside of Designated Centres

BEE9: Jobs and Skills and Employment Training

BEE10: Higher Education, Research and Development

BEE11: Schools

Housing

Strategic Policy SP2: Housing

H1: Housing Provision

H2: Residential Development Principles including Alterations and Extensions

H3: Affordable Housing

H4: Specialist Housing Needs

H5: Houses in Multiple Occupation

H6: Institutional Investment in the Private Rented Sector

Historic and Built Environment

Strategic Policy SP3: The Built Environment

Strategic Policy SP4: The Historic Environment

HBE1: Designating Protected Views

HBE2: Inclusive Design

HBE3: Designating Conservation Areas

HBE4: Local Listing

HBE5: Archaeology

HBE6: Local Identity

HBE7: Energy Hierarchy

HBE8: Sustainable Design and Construction

Infrastructure

Strategic Policy SP5: Infrastructure to Support Growth and Convergence

IN1: New and Existing Community Infrastructure

IN2: Energy Infrastructure and Heat Networks

IN3: Water Supply and Sewerage Infrastructure

IN4: Waste Management

Natural Environment

Strategic Policy SP6: The Natural Environment

NE1: Integrating the Built and Natural Environment

NE2: The Natural Environment and Health and Well-being

NE3: The Waterways

NE4: Flood Risk

NE5: Biodiversity

NE6: Land Quality and Contaminated Land

NE7: Air Quality

NE8: The All London Green Grid

NE9: Metropolitan Open Land

NE10: Local Open Space

NE11: Parks and Parklands

NE12: Play Space

Transport and Connectivity

Strategic Policy SP7: Transport and Connectivity

T1: Local Connectivity

T2: Strategic Transport Improvements

T3: Parking and Parking Standards

T4: Provision for Pedestrians and Cyclists

T5: Transport Assessments and Travel Plans

T6: Road Hierarchy

T7: Transport Improvements

T8: Supporting Transport Schemes

T9: The Transport Function of Waterways

Delivery and Implementation

Strategic Policy SP8: Delivery and Implementation

DI1: S106 Planning Obligations and Community Infrastructure Levy

DI1: Compulsory Purchase

2.5 Sub Area Policies

Within the LLDC area there are four Sub Areas (as illustrated in Figure 1). Policies specific to each of the Sub Areas are also included in the Local Plan as follows:

Sub Area 1: Hackney Wick and Fish Island

SA1.1: Building Heights and Development Density

SA1.2: Improving Connections

- SA1.3: A Neighbourhood Centre
- SA1.4: Heritage-led Regeneration
- SA1.5: Conservation Areas
- SA1.6: Community Facilities
- SA1.7: Heat Networks and Renewable Energy
- SA1.8: Flood Risk

Sub Area 2: North Stratford and Eton Manor

- SA2.1: Housing Typologies
- SA2.2: Housing Densities
- SA2.3: Building Heights
- SA2.4: Leyton Road – improving the public realm
- SA2.5: Improving Connections
- SA2.6: Non-residential Uses

Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park

- SA3.1: A Metropolitan Centre
- SA3.2: Cultural and Education Facilities
- SA3.3: Interim Leisure, Cultural and Event Uses
- SA3.4: General Building Heights and Development Density
- SA3.5: Improving Connections
- SA3.6: Community Facilities
- SA3.7: Development within the Greater Carpenters District

Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads

- SA4.1: A District Centre
- SA4.2: General Building Heights and Development Density
- SA4.3: Improving Connections
- SA4.4: Community Facilities
- SA4.5: Heat Networks and Renewable Energy
- SA4.6: Enhancing Three Mills Island

3 THE HABITATS REGULATIONS ASSESSMENT PROCESS

This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

3.1 Stages in HRA

The requirements of the Habitats Directive comprise four distinct stages:

- 1 Screening** is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in-combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice (ECJ) case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made.
- 2 Appropriate Assessment** is the detailed consideration of the impact upon the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.
- 3 Assessment of alternative solutions** is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.
- 4 Assessment where no alternative solutions exist and where adverse impacts remain.** At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

3.2 Approach to Screening

This Screening Report takes into account the requirements of the Habitats Directive and relevant guidance produced by David Tyldesley Associates for Natural England³ and the Countryside Council for Wales (now Natural Resources Wales)⁴.

The following stages have been completed:

- Identification of all European sites potentially affected (including those outside of the Local Plan area for which impact pathways have been identified);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the policies which have the potential to affect the European sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the policy, in line with Natural England guidance);
- A consideration of any impacts in combination with other plans or projects;
- Where potential effects are identified, avoidance or mitigation measures have been considered in order to avoid significant effects.

3.3 Definition of Significant Effects

A critical part of the HRA screening process is determining whether the proposals are likely to have a significant effect on European Sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance, and also its conservation objectives. A useful definition of significant effects is provided in Welsh planning guidance, which can be drawn upon in this case:

'...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives'.

3.4 In-Combination Effects

As outlined in Section 3.1, it is necessary for HRA to consider in-combination effects with other plans and projects which could act in-combination with the Local Plan to result in any likely significant effects on the European sites identified. A list of plans and documents for review was provided in the Scoping Report⁵. In addition, a few more plans and projects have been

³ Revised Draft Guidance. The Habitats Regulations Assessment of Local Plan Documents. David Tyldesley and Associates for Natural England (2009).

⁴ Draft Guidance for Plan Making Authorities in Wales - The Appraisal of Plans under the Habitats Directive. David Tyldesley and Associates for Countryside Council for Wales (CCW) Bangor (November 2009, revised April 2010 and September 2012).

⁵ LLDC Local Plan Sustainability Appraisal and Habitats Regulations Assessment – Habitats Regulations Assessment Scoping Report, Hyder Consulting, April 2013

identified; therefore, the plans to be considered for the in-combination assessment are as follows:

- Newham 2027: Planning Newham the Core Strategy (adopted January 2012 interim version);
- Hackney Core Strategy Development Plan Document (December 2010);
- Core Strategy 2025 Development Plan Document for Tower Hamlets (adopted September 2010);
- Waltham Forest Local Plan Core Strategy (adopted March 2012);
- Area Action Plans (Hackney Wick and Fish Island);
- The London Plan;
- Olympic Legacy Supplementary Planning Guidance (2012);
- The Legacy Communities Scheme;
- Lee Valley Regional Park Authority Park Development Framework (2011);
- Walthamstow Reservoirs Feasibility Study, Masterplan, Management Plan and Business Plan (April 2010);
- Joint Waste Development Plan for the East London District Boroughs (2011);
- North London Waste Plan (2011);
- London Abstraction Licensing Strategy (February 2013), Environment Agency;
- Draft Water Resources Management Plan 2015-2040 (May 2013), Thames Water;
- Clearing the Air, the Mayor's Air Quality Strategy (2010).

It should be noted that in-combination effects only require consideration where the plan or project being assessed has an impact, whether significant or not. A conclusion of 'Zero Effects' negates the possibility of in-combination effects.

3.5 Mitigation Measures

In preparing this report, consideration has been given to potential avoidance and mitigation measures which would serve to avoid adverse effects on the integrity of European sites, for example the provision of specific clauses within the strategy that may prevent adverse effects occurring.

4 IDENTIFICATION OF EUROPEAN SITES AND POTENTIAL IMPACTS

4.1 Approach to Identifying Sites

Department for Communities and Local Government (CLG) guidance⁶ states that the HRA should be ‘*proportionate to the geographical scope of the option (plan) and the nature and extent of any effects identified.*’

No European Sites are located within the LLDC area boundary, therefore no direct land-take from any European Sites is predicted as a result of plan implementation. However, European sites outside of the boundary may be affected by activities undertaken within the LLDC area if they are connected through an impact pathway, for example, hydrological links or impacts upon air quality.

4.2 European Sites

Table 4-1 lists the European Sites considered to have the potential to be affected by the LLDC Local Plan:

Table 4-1 European Sites that could be affected by the LLDC Local Plan

Name of Site	Identification Number	Status	Distance from LLDC Boundary
Lee Valley Special Protection Area	UK9012111	SPA	3.4km north-west
Lee Valley Ramsar site	UK11034	Ramsar	3.4km north-west
Epping Forest Special Area of Conservation	UK0012720	SAC	2.9km to the north-east

Appendix A provides further information regarding the above European sites, including current conservation status, threats and the results of the most recent condition assessments. The qualifying features of the sites are discussed below in relation to the potential impacts upon them as a result of the plan’s proposed activities.

⁶ Department for Communities and Local Government (2006) Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents.

4.3 Potential Impacts of the Local Plan

The Local Plan was reviewed and the following potential impact types were identified that may have indirect effects on European sites and their qualifying species.

4.3.1 Increased recreational pressure

The LLDC area lies approximately 3.4km to the south-west of Walthamstow Reservoirs SSSI (a component SSSI of the Lee Valley SPA/Ramsar) and 2.9km to the south-west of Epping Forest SAC. The remaining component sites of the Lee Valley SPA/Ramsar are situated approximately 15km to the north of the LLDC area. An increase in population levels due to the construction of approximately 20,000 new homes has the potential to increase recreational disturbance at both of these European sites. This should also be assessed in the context of over 305,000 new dwellings to be delivered in Greater London under the London Plan.

Lee Valley SPA/Ramsar

Disturbance to over-wintering birds (specifically the SPA qualifying features, shoveler and gadwall) may be visual or through sudden noise. It can result in a variety of responses, but birds typically take flight expending unnecessary energy before resuming activity in the same area or relocating to adjacent areas. The overall effect on a bird population is dependent on a range of factors, including: the frequency of disturbance, habituation and toleration to disturbance, availability of other suitable habitat and the number of birds (if adjacent areas are at their carrying capacity).

Results of research by Natural England into the relative proximity of development to European sites and damage to interest features⁷ included recommendations for implementing a series of zones (in that case from the Thames Basin Heaths SPA), within which various constraints would be placed on development. A zone of influence of 5km from the European site was recommended as being the principle recreational catchment of the site. The LLDC area is less than 5km from the Lee Valley SPA, therefore it is reasonable to assume that an increase in population in the LLDC area, particularly when taken into consideration with other large housing development targets, could increase recreational pressure on the Lee Valley SPA/Ramsar.

A study by Cruickshank *et al*⁸ into recreational disturbance on the Humber Estuary found that to understand disturbance to birds it is important first to understand the human use of the area (for example, access patterns and recreational use). The spatial patterns of recreational access (both on the water and on the shore) are also critical to understand disturbance in context. It is also necessary to consider the species' ecology of an area, habitat quality and other factors that may influence the scale of the disturbance. This information can then be used to identify what kinds of disturbance, and at which locations, are likely to have an impact.

A three-year study of wetland birds at the Stour and Orwell SPA⁹ found that walkers, boats and dogs were the most regular sources of disturbance. However, the greatest responses came

⁷ Thames Basin Heaths Special Protection Area Delivery Framework, Thames Basin Heaths Joint Strategies Partnership Board, February 2009

⁸ Cruickshanks, K., Liley, D., Fearnley, H., Stillman, R., Harvell, P., Hoskin, R. & Underhill-Day, J. (2010). Desk Based Study on Recreational Disturbance to birds on the Humber Estuary. Footprint Ecology / Humber Management Scheme

⁹ Ravenscroft, N. (2005). Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. ERA report 44, Report to Suffolk Coast and Heaths Unit.

from relatively infrequent events, such as gunshots and aircraft noise. Birds seemed to habituate to frequent 'benign' events, such as vehicles, sailing and horses. Despite this, there was evidence to suggest that birds were avoiding the most frequently-disturbed areas. Disturbance was greatest at high tide and on the Orwell, however; birds on the Stour showed the greatest sensitivity to disturbance.

Birds that use the Lee Valley SPA/Ramsar are already within an urban situation, with high-rise buildings surrounding the site and a busy road (A508) passing through the centre of the designated area. Therefore, it is considered likely that they are already habituated to a high level of background noise and the visible presence of human activity.

Although recreational access to Walthamstow Reservoirs (part of the Lee Valley SPA/Ramsar) is controlled by permits, there are proposals to open the Reservoirs to wider public access through more entrances and improved strategic links¹⁰. Notwithstanding this, the management of access so that the nature conservation importance of the site is not compromised (e.g. closing paths to prevent disturbance on all sides of the reservoirs at sensitive times of year) is a priority. It is considered that screening of policies within the LLDDC Local Plan to determine whether they could lead to a significant increase in recreational pressure on the Lee Valley SPA/Ramsar, in combination with other plans and projects, is required.

Epping Forest SAC

Increased visitor numbers to Epping Forest SAC may result in trampling of vegetation, nutrient enrichment due to dog fouling, soil compaction and erosion, all of which may inhibit delivery of the conservation objectives for the site.

The most recent visitor survey results for Epping Forest¹¹ revealed that visitors to Hollow Pond (the part of the SAC closest to the LLDC area, 2.9km away) numbered approximately 429,000 during 2011, the highest number observed across all the 29 sites where surveys were undertaken. Wanstead Flats, a large park used for recreation 2.3km from the LLDC area, had approximately 395,000 visitors over the same period. It was also noted that this was an underestimate, as the figures did not take into account the thousands of league football supporters who use the site during the football season.

The distribution of visitors across Hollow Ponds also indicated a large concentration around the southern edges of the lake (close to the car park) and along the paths. Few were visitors were observed in the northern part of the site or in the woodland areas.

The survey also revealed that previous studies found those living within 2km of the Forest edge comprise at least 95% of all visitors. Just over half the 2011 sample travelled less than 10 minutes to get into the Forest, and of these the majority either walked or drove. As 71% of those who walked travelled less than 10 minutes to reach the Forest, the report concluded that the constituent parts of the Forest were used much in the same way as an urban park would be by those living within walking or cycling distance.

As the LLDC area is almost 3km away from Epping Forest SAC, it is considered likely that the proportion of visitors to the SAC would be small. In addition, car ownership in the four boroughs

¹⁰ Walthamstow Reservoirs Feasibility Study, Masterplan, Management Plan and Business Plan (April 2010), Chris Blandford Associates

¹¹ Epping Forest Visitor Survey 2011 Results Survey (May 2012), Alison Millward Associates

that are part of the LLDC is low. The Core Strategy for Tower Hamlets¹² states that 55.77% of households do not have access to a car, meaning that access by car to Epping Forest from within the LLDC area is likely to be limited for a significant proportion of the population.

Taking into account there are also large recreational areas closer to the LLDC area (e.g. Wanstead Flats) and the fact that the Local Plan includes a key objective relating to the provision of open space and biodiversity through the legacy of the Queen Elizabeth Olympic Park, to effectively tie into the London Green and Blue Grids, it is considered that there would be no significant increase in recreational pressure on Epping Forest through housing development in the LLDC area.

However, the effects of a 'de minimus' increase in recreational pressure will be examined further in the in-combination effects of other plans and projects section.

4.3.2 Increased air pollution

Potential adverse impacts on air quality as a result of increased population and therefore road traffic may affect habitats that are sensitive to increased nitrous oxides (NO_x), nitrogen deposition (N) and sulphur dioxide (SO₂). The deposition of pollutants on vegetation can damage the vegetation directly or can affect plant health and productivity. In addition, the characteristics of the soil can be altered (for example pH) which in turn can affect plant health, productivity and species composition. The following pollutants are of most concern with respect to vehicular emissions.

Nitrogen oxides (NO_x)

Nitrogen oxides are produced in combustion processes, partly from nitrogen compounds in fuel, but mostly by a direct combination of atmospheric nitrogen and oxygen in flames. Nitric oxide (NO) and nitrogen dioxide (NO₂) collectively are known as NO_x. The UK emits around 2.2million tonnes of NO₂ per year¹¹; about half of this comes from motor vehicles.

Ammonia (NH₄)

Ammonia in the atmosphere results primarily from the decomposition and volatilisation of animal wastes (www.apis.org.uk). It is also emitted from petrol vehicles fitted with catalytic converters and heavy duty vehicles fitted with selective catalytic reduction.

Effects of pollutants

Nitrogen deposition is the term used to describe the transfer of nitrogen from the atmosphere to the earth. Nitrogen is an essential plant nutrient, and, as such, some of the nitrogen-containing pollutants, such as NO_x and ammonia, can be absorbed by plants. However, too much nitrogen can lead to eutrophication, creating conditions which favour plants with a high demand for nitrogen. Many lower plants (bryophytes and lichens) and communities that thrive in low nutrient conditions, such as heathlands, undergo changes in species composition as a result of the 'fertiliser effect' of eutrophication. Grass species can increase and species diversity of bryophytes and lichens can decline.

Acid deposition represents the mix of pollutants, which include NO_x and ammonia, that together lead to the acidification of soils and freshwater. Acidification - a loss of alkali nutrients (calcium,

¹² Core Strategy 2025 Development Plan Document Tower Hamlets (adopted September 2010).

magnesium and potassium) through leaching and their replacement with acidic elements such as hydrogen and aluminium - is toxic to plants.

Lee Valley SPA/Ramsar

The bird features of Lee Valley SPA (shoveler, gadwall and bittern) are not in themselves susceptible to increases in nitrogen or acid deposition; however; their supporting habitats could be, as eutrophication of fresh water could lead to increased algal growth at the expense of aquatic vegetation. At a site level (Walthamstow Reservoirs SSSI being the closest component of the SPA) there is little evidence to suggest that this is currently an issue. The most recent condition assessment, based on data from 2008¹³, found that the site was in good condition and that the numbers of shoveler remained favourable. The site was classified as 'unfavourable recovering'.

Wintering bittern are found over 15km to the north of the LLDC area. The site condition assessment of the underlying SSSI (Turnford and Cheshunt Pits SSSI), undertaken in February 2013, assessed the site as being in 'favourable condition', and the habitat was supporting favourable populations of overwintering gadwall, shoveler and bittern. The contribution of any increases in air pollution from development in the LLDC area affecting habitat that supports bittern is therefore considered unlikely to be insignificant, especially given the distances involved.

As a result of this conclusion, the impacts of increases in air pollution on the Lee Valley SPA/Ramsar as a result of development within the LLDC area will not be considered further.

Epping Forest SAC

Epping Forest SAC, located approximately 3km to the north-east of the LLDC area, supports bryophytes and plant communities that require low nutrient inputs. The most recent condition assessment of the underpinning component part of Epping Forest SSSI, undertaken in January 2010,¹⁴ concluded that it was in an 'unfavourable no change' state, primarily due to the excessive levels of nitrous oxides and acid deposition that the site was subject to.

Table 4-2 and Table 4-3 below are based on information taken from the Air Pollution Information Systems (APIS) website¹⁵, and detail the actual deposition of pollutants on each of the SAC habitat features that are sensitive to pollutants. These figures are based on 'critical loads'¹⁶ and illustrate the exceedances of the pollutants in relation to these critical loads based on a three-year average (2009-11).

¹³ Walthamstow Reservoirs SSSI site condition assessment accessed via <http://www.sssi.naturalengland.org.uk>

¹⁴ Unit 136, Hollow Flats site condition assessment accessed via <http://www.sssi.naturalengland.org.uk>

¹⁵ <http://www.apis.co.uk>

¹⁶ 'Critical load' is the quantity of pollutant deposited from air to ground, above which significant harmful effects on specified features of the environment can occur.

Table 4-2 Critical Loads and Nitrogen deposition for Epping Forest SAC (2009-11 average)

Feature	Empirical critical load Kg N/ha/yr	Total Nitrogen deposition		
		maximum	minimum	average
Wet heath	10-20	24.64	17.36	18.37
Dry heath	10-20	24.64	17.36	18.37
Beech woodland	10-20	46.76	33.32	35.11

Table 4-3 Critical Loads and Acid deposition for Epping Forest SAC (2009-11 average)

Feature	Maximum critical load keq/ha/yr		Total Acid deposition keq/ha/yr	
	Nitrogen	Sulphur	Nitrogen	Sulphur
Wet heath	2.734	1.66	1.77	0.22
Dry heath	2.734	1.66	1.77	0.22
Broadleaved woodland	3.012	2.655	3.39	0.26

It can be seen from the tables above that the beech woodland feature is currently receiving significant amounts of nitrogen input into the system. This was reflected in the condition assessment, which observed that veteran trees were displaying clear signs of stress (thin canopy and die back of leading shoots) and that bryophytes were sparse and lacked diversity.

As the prevailing winds are from a south-westerly direction, there is a risk that any increases in air pollution could affect Epping Forest SAC; therefore, Local Plan policies that could result in an increase in air pollution will be screened further.

In terms of localised air pollution from car emissions, guidance produced by the Highways Agency¹⁷ for assessing the impacts of transport schemes on air quality states that only designated sites within 200m of the road need to be considered. Although the LLDC area is almost 3km away from Epping Forest, theoretically, development within the LLDC area and from other local plan jurisdictions could lead to increased vehicle journeys along the major roads (in particular the A12) that run through or adjacent to the Forest, and could contribute further to the already high levels of NO_x deposition.

4.3.3 Water abstraction and quality

Lee Valley SPA/Ramsar

The majority of London's public water supply comes from the Rivers Thames and Lee (with approximately 80% of London's supply taken from the freshwater River Thames upstream of

¹⁷ Design Manual for Roads and Bridges (DMRB) Volume 11 Environmental Assessment Section 3 Environmental Assessment Techniques Part 1 HA207/07 Air Quality, May 2007

Teddington Weir). The remaining supplies are obtained from groundwater sources situated beneath the London Boroughs from the confined chalk aquifer. Some water supply is provided by the Lee Valley Reservoirs, including Walthamstow Reservoirs SSSI, a component of the SPA.

The London Abstraction Licensing Strategy¹⁸ states that for the Lower Lee catchment (where the LLDC area is located), no new consumptive surface water abstractions will be issued (except at times of very high flows). Abstraction during very heavy flows will not provide a reliable source of water, as this may not occur every year.

The Thames Water draft Water Resources Management Plan¹⁹ for 2015 to 2040 forecasts a significant deficit between the amount of water available and demand in London. This shortfall grows from 125 million litres per day in 2020 to 367 million litres by 2040 – equivalent to the water needed by 2.2 million people. This is due partly to population growth estimates, in combination with climate change and Water Framework Directive requirements.

It is therefore considered that the policies within the Local Plan require screening to determine whether they could lead to significant adverse effects due to increased surface water abstraction, either alone or 'in-combination' with other plans or projects on the Lee Valley SPA/Ramsar.

With respect to adverse impacts on water quality as a result of pollution incidents from proposed development, the LLDC area is considered far enough away from the SPA/Ramsar for there to be no impact, should any pollution incident occur.

The Lower Lea Valley as a whole has a combined foul and surface water drainage system with the potential to regularly overflow into watercourses and reduce water quality. The new Lee Tunnel is designed to relieve the combined surface and foul water drainage overflows from Abbey Mills pumping station as part of a wider programme to meet the requirements of the Water Framework Directive. The Lee Tunnel project is expected to be complete by 2015. The Thames Tideway Tunnel project is also planned to relieve combined storm-water overflows along the River Thames in London as a whole, and will join the Lee Tunnel system at Abbey Mills. It is considered that this investment in sewage infrastructure at a London-wide level (and therefore out of the local authorities' control) will reduce the potential for future pollution incidents.

Epping Forest SAC

Epping Forest SAC (and the LLDC area) are underlain by impermeable London Clay, which completely confines the aquifer underneath¹⁶. The groundwater flow within this aquifer originates from unconfined areas upstream, outside the London area. As a result, it is considered that no effect on the qualifying features of Epping Forest SAC will result from any increases in water demand due to Local Plan policies, or other policies in-combination, as there is no impact pathway between the feature and the principle aquifer.

¹⁸ London Abstraction Licensing Strategy (February 2013), Environment Agency

¹⁹ Draft Water Resources Management Plan 2015-2040 (May 2013), Thames Water

4.3.4 Climate change

Changes in climate are predicted for the future, with warmer, wetter winters and hotter, drier summers, together with more frequent and more extreme weather events, such as heat waves. Major cities such as London are also particularly susceptible to 'heat island effects', where solar energy is stored within the urban buildings and infrastructure, making it several degrees warmer in cities than in rural areas. Both Epping Forest and Lee Valley SPA/Ramsar are likely to be subject to climate change, which could result in reduced water levels and increased stress on vegetation and species. Climate change could also result in a change in the distribution of species, including potential colonisation of new species, including invasive/pest species.

Climate change effects could be exacerbated by further development of urban areas and reductions in green space, together with increased vehicle movements; therefore, climate change will be considered as part of the HRA screening process of LLDC Local Plan policies.

4.3.5 Summary of potential impacts

Table 4-4 provides a summary of the features of the European Sites that could be affected by policies within the LLDC Local Plan, either on their own, or in-combination with other plans and policies.

Table 4-4 European Features that could be affected by the LLDC Local Plan

Potential Impacts of Local Plan	European Sites and Features Potentially Affected
Increased recreational pressure through trampling of sensitive vegetation, noise and visual disturbance of qualifying interest species	Over-wintering bird populations of Lee Valley SPA/Ramsar Heathland habitats of Epping Forest SAC
Increases in air pollution due to increase in road traffic as a result of residential/industrial development	Habitats of Epping Forest SAC
Impacts on hydrology of sites due to increased demand for water resulting from residential/industrial development e.g. water abstraction from Lee Valley Reservoirs	Over-wintering bird populations of Lee Valley SPA/Ramsar
Effects of climate change resulting in reduced water levels and increased stress on vegetation and species. Changes in the distribution of species, including invasive/pest species.	Over-wintering bird populations of Lee Valley SPA/Ramsar Habitats of Epping Forest SAC

4.4 Conservation Objectives of the European Sites

Under Regulation 35(3) of the Conservation of Habitats and Species (Amendment) Regulations 2012, the appropriate statutory nature conservation body (in this case Natural England) has a duty to communicate the conservation objectives for a European site to the relevant competent authority responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- *Its natural range and the area it covers within that range are stable or increasing;*
- *The specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future; and*
- *Conservation status of typical species is favourable as defined in Article 1(i).*

The conservation status of a species will be taken as favourable when:

- *Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;*
- *The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and*
- *There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.*

Guidance from the European Commission²⁰ indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

Conservation Objectives for the Lee Valley SPA/Ramsar and Epping Forest SAC are provided in Appendix A.

²⁰ Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2000)

5 SCREENING

5.1 Screening Approach taken for the Local Plan

The screening process has been split into two distinct stages, initial screening and detailed screening. The initial screening stage (5.1.1 and Table 5-1, below) has provided a high level screening 'matrix style' assessment to determine if the LLDC Local Plan could possibly lead to significant adverse effects on European sites identified in Table 4-1. The purpose of this is to eliminate those policies from the assessment which very clearly would not affect European sites in order to focus on those policies where there is potential for effects or uncertainty about potential effects. The eliminated policies are defined by the following criteria:

- The policy itself will not lead to development (e.g. it relates to design or is not a land use planning policy);
- No development could occur through the policy alone, because it is implemented through subordinate policies that are more detailed and therefore more appropriate to assess for their effects on the European Site;
- There is no impact pathway to any of the European sites identified; and/or
- The policy is intended to protect the natural environment, including biodiversity.

Policies that were identified as having potential indirect impacts on the European sites, or those policies for which impacts were uncertain, were carried forward into a more detailed screening assessment.

When identifying the elements of the Local Plan that could potentially affect European sites, it was important to focus upon those elements that would have the greatest likelihood of impacting the sites. Therefore, the definition of significance identified in Section 3.3 was very important for the detailed screening.

The LLDC Local Plan is intended to be read as a single document rather than a series of separate policies, and has been assessed as such. Proposals in one area of the Local Plan may mitigate potentially damaging activities promoted in another area, and should therefore be understood in the wider context of the Plan's aims and purposes.

The following sections outline the initial and detailed screening of the LLDC Local Plan, respectively.

5.2 Initial Screening of the Local Plan Policies

The initial screening of the LLDC Local Plan is presented in Table 5-1 below.

The policies within the sub-headings were initially examined to determine their need for further detailed assessment. The notations below were used to indicate if further detailed assessment is required:

- ✓ Further detailed assessment is required to determine the nature of effects on the European site.
- X No further assessment is required, as no effects are predicted on the European site.

Table 5-1 Initial Screening of LLDC Local Plan

European Site	Business, Economy and Employment	Housing	Historic and Built Environment	Infrastructure	Natural Environment	Transport and Connectivity	Sub Area 1: Hackney Wick and Fish Island	Sub Area 2: North Stratford and Eton Manor	Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park	Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads	Delivery and Implementation
Lee Valley SPA	✓	✓	X	✓	X	✓	✓	✓	✓	✓	X
Lee Valley Ramsar	✓	✓	X	✓	X	✓	✓	✓	✓	✓	X
Epping Forest SAC	✓	✓	X	✓	X	✓	✓	✓	✓	✓	X
Comments	<p>Strategic Policy SP1 sets out the strategy within which these policies will be followed. No development could occur through this policy alone, as it is implemented through subordinate policies detailed below, which are more appropriate to assess for their potential impacts - therefore, this policy will not be taken further.</p> <p>Policies BEE1, BEE2, BEE3, BEE4, BEE7, BEE8, BEE10 and BEE11 relate to the location of development land for employment and education. These could have impacts on the European sites through increased recreational pressure leading to degradation of habitats and disturbance of species, adverse impacts on hydrology and air quality.</p> <p>Policies BEE5, BEE6 and BEE9 are concerned with mixed use proposals, available workspace and training, and will not result in any impacts on the European Sites.</p>	<p>Strategic Policy SP2 provides the framework against which housing development opportunities will be assessed. As with SP1, no development will occur through this policy alone, so this strategic policy will not be taken forward for further assessment.</p> <p>Policies H1 and H3 provide annual targets for housing provision and affordable housing. Therefore there are potential impacts on European sites as a result of the implementation of these policies.</p> <p>Policy H2 relates to design principles, H4 to specialist housing needs, H5 to houses in multiple occupation and H6 relates to investment in the private sector. None of these policies are anticipated to have any effects on European sites.</p>	<p>Strategic Policy SP3 concerns the design of the built environment, and Strategic Policy SP4 seeks to ensure the conservation of the historic environment.</p> <p>Policies HBE1, HBE2, HBE3, HBE4 and HBE5 relate to issues such as designating protected views, inclusive design, designating conservation areas, local listing and archaeology.</p> <p>None of the above policies are anticipated to have any effects on European sites.</p>	<p>Strategic Policy SP5 concerns an Infrastructure Delivery Plan and Community Infrastructure Levy. As with SP1 & SP2, this policy will not be taken forward for further assessment.</p> <p>Policy IN1 relates to the provision of new and existing community infrastructure and Policy IN2 concerns the provision of energy infrastructure and heat networks. It supports proposals for new energy infrastructure, which may have the potential to indirectly affect European Sites (e.g. wind turbines affecting flight lines of SPA species).</p> <p>Policy IN3 concerns opportunities to reduce water demand and use. This policy is not anticipated to have any adverse effects on European sites.</p> <p>Policy IN4 concerns policies for new waste management facilities. Depending upon what form these take (i.e. incinerators) these proposals may have the potential to affect Epping Forest SAC through a reduction in air</p>	<p>Strategic Policy SP6 seeks to ensure the protection of the natural environment. Policies NE1 and NE2 relate to the natural environment, health and the built environment. Policy NE3 concerns the waterways, Policy NE4 flood risk and NE5 the promotion of biodiversity.</p> <p>Policy NE6 concerns land quality and contaminated land and Policy NE7 air quality (including proposals to minimise the effect of emissions). Policies NE9, NE10, NE11 and NE 12 relate to open land and play spaces, Through the implementation of the above policies, benefits to general biodiversity and potential adverse impacts on the European sites as a result of other policies, should be reduced. None of the above policies will result in any adverse impacts on the European sites.</p>	<p>Strategic Policy SP7 seeks to deliver a range of transport infrastructure through the promotion of sustainable transport choices. As with SP1, SP2 and SP5, it is not considered appropriate to take this strategic policy to further assessment.</p> <p>Policy T1 concerns local connectivity and Policy T2 strategic rail improvements. Policy T3 deals with parking and Policy T4 the provision for pedestrians and cyclists. Policy T5 relates to transport assessment and travel plans and Policy T6 to road hierarchy. None of the above policies are anticipated to have any adverse impacts on European Sites.</p> <p>Policy T7 concerns transport improvements and Policy T8 supporting public transport and highway schemes. Policy T9 relates to the transport function of the waterways. All of these policies have the potential to affect the habitats of the European Sites through an increase</p>	<p>Policy SA1.1 concerns building heights and density; Policy SA1.2 improving connections; Policy SA1.4 heritage-led regeneration; SA1.5 conservation areas; SA1.6 community facilities; and SA1.8 flood risk. It is not anticipated that any direct or indirect impacts on European sites will result from the implementation of these policies.</p> <p>SA1.7 concerns heat networks and renewable energy. Indirect impacts on the Lee Valley SPA/ Ramsar may occur regarding any wind turbine proposals that could affect flight lines of SPA species.</p> <p>The site allocations, which set out where in the sub-area new development is to take place (and are referred to as Planning Delivery Zone 4 (PDZ4) - Sweetwater and PDZ5 – East Wick and also in Policy SA1.3: neighbourhood centre), have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p>	<p>Policy SA2.1 relates to housing typologies and Policy SA2.2 housing densities. Policy SA2.3 concerns building heights; Policy SA2.4 improving the public realm of Leyton Road; Policy SA2.5 improving connections and Policy SA2.6 non-residential uses.</p> <p>It is not anticipated that any direct or indirect impacts on European sites will result from the implementation of these policies.</p> <p>The site allocations, which set out where in the sub-area new development is to take place (referred to as Chobham Farm, East Village and Chobham Manor) have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>Although not strictly policies, the impacts of these site allocations will be assessed further.</p>	<p>Policy SA3.1 concerns proposals for a Metropolitan Centre in compliance with policies BEE1 and BEE7. These policies have already been identified as potentially having an effect on European Sites, so Policy SA3.1 will be assessed in the same context.</p> <p>Policy SA3.2 relates to cultural and education facilities; Policy SA3.3 interim leisure, cultural and event uses; Policy SA3.4 general building heights and development density; Policy SA3.5 improving connections and SA3.6 the loss of community facilities. None of these policies are anticipated to have adverse impacts on the European sites.</p> <p>However, Policy SA3.7 deals with development within the Greater Carpenters District (one of the site allocations) and, as such, has the potential to affect European sites. In line with the other Sub Areas, the remaining site allocations also have the potential to affect European Sites and will therefore be</p>	<p>Policy SA4.1 promotes the delivery of a District Centre, the development of which could have impacts on the European Sites.</p> <p>Policy SA4.2 concerns building heights and density; Policy SA4.3 improving connections; Policy SA4.4 community facilities; and Policy SA4.6 enhancing Three Mills Island.</p> <p>It is not anticipated that any direct or indirect impacts on European sites will result from the implementation of these policies.</p> <p>However, Policy SA4.5 relates to heat networks and renewable energy, and potential indirect impacts on the flight lines of SPA species could result.</p> <p>The site allocations, which set out where in the sub-area new development is to take place (referred to as Bromley-by-Bow, Pudding Mill, Sugar House Lane and Three Mills), have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential</p>	<p>Strategic Policy SP8 refers to working with partners to promote and support the plan policies.</p> <p>Policy DI1 concerns Section 106 Planning Obligations, and Policy DI2 compulsory purchase powers.</p> <p>It is not envisaged that the implementation of any of these policies will have adverse impacts on European Sites.</p>

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Following this initial screening of the LLDC Local Plan, policies contained within three of the chapters in the plan can be screened out completely from further assessment, on the basis that no identifiable impact pathway exists linking the policies with the European Sites and/or because there will be no foreseeable adverse impact on European sites through policy implementation. In addition, several further policies under each of the sub-headings have been screened out of further assessment on a similar justification.

In total, therefore, the policies screened out of further assessment are as follows:

Business, Economy and Employment: SP1, BEE5, BEE6 and BEE9

Housing: SP2, H2, H4, H5 and H6

Historic and Built Environment: SP3, SP4, HBE1, HBE2, HBE3, HBE4 and HBE5

Infrastructure: SP5 and IN3

Natural Environment: SP6, NE1, NE2, NE3, NE4, NE5, NE6, NE7, NE8, NE9, NE10, NE11 and NE12

Transport and Connectivity: SP7, T1, T2, T3, T4, T5, and T6

Sub Area 1: Hackney Wick and Fish Island: SA1.1, SA1.2, SA1.4, SA1.5, SA1.6 and SA1.8

Sub Area 2: North Stratford and Eton Manor: SA2.1, SA2.2, SA2.3, SA2.4, SA2.5 and SA2.6

Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park: SA3.2, SA3.3, SA3.4, SA3.5 and SA3.6

Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads: SA4.2, SA4.3, SA4.4 and SA4.6

Delivery and Implementation: SP8, DI1 AND DI2

Table 5-1 illustrates which policies under each chapter have been identified for further detailed screening assessment (i.e. which are screened in).

5.3 Assessment of Potential Impacts

A more detailed assessment of the potential impacts identified in Table 4-2 is found below, specifically in relation to the policies screened in.

5.4 Detailed Screening of the Local Plan Policies

The detailed screening of the Local Plan policies in relation to the European Sites is presented in Table 5-2, below, and is based on the findings of the initial screening exercise and the assessment of potential impacts, as mentioned in Section 5.3. Policies have been selected for further screening on the basis that there may be potential impacts on European Sites if they are implemented without any mitigation or avoidance measures. This has also included a

categorisation of the potential effects in line with Natural England Guidance²¹. Further information regarding this assessment is found in Appendix B.

An assessment of possible mitigation or avoidance measures, along with the potential effects of the policy in combination with other plans or projects, has also been undertaken.

The policies selected for detailed screening are as follows:

Business, Economy and Employment: BEE1, BEE2, BEE3, BEE4, BEE7, BEE8 and BEE10

Housing: H1 and H3

Infrastructure: IN1, IN2 and IN4

Transport and Connectivity: T7, T8 and T9

Sub Area 1: Hackney Wick and Fish Island: SA1.3, SA1.7 and the site allocations

Sub Area 2: North Stratford and Eton Manor: the site allocations

Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park: SA3.1, SA3.7 and the site allocations

Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads: SA4.1, SA4.5 and the site allocations

Local Plan policies were examined in detail to determine the need for Appropriate Assessment. It is considered that the need for Appropriate Assessment of the final policies should be avoided if at all possible, with the strengthening of the existing policies to include specific references to environmental assessment and caveats regarding HRA through the development process.

5.5 In-Combination Effects

The HRA needs to consider not only the 'screened in' policies within the LLDC Local Plan that may lead to significant impacts upon European sites on their own, but also those that may have a significant impact in combination with other plans and projects within the local area. Section 3.4 outlines relevant plans and projects that were considered in-combination with the LLDC Local Plan.

Only the effects of other plans or projects which (like those of the plan under consideration here) alone would not be likely to be significant, needed to be included in the in-combination assessment. If the effects of other plans or projects were already significant on their own, they were not added to those associated with the LLDC Local Plan.

To be relevant to the *in-combination* assessment, the residual effects of other plans or projects will need to either make the unlikely effects of the LLDC Local Plan likely, or insignificant effects of the plan significant, or both. An assessment has therefore been made of the 'other' plans and projects listed in Section 3.4 with a view to determining whether or not they would result in impacts which, in combination with the policies set out in the LLDC Local Plan could lead to

²¹ Revised Draft Guidance. The Habitats Regulations Assessment of Local Plan Documents. David Tyldesley and Associates for Natural England (2009).

significant effects on the Lee Valley SPA/Ramsar or Epping Forest SAC. This is also detailed in Table 5-2.

Table 5-2: Detailed Screening of LLDC Local Plan Policies on European Sites outside of LLDC area

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
<p>Business, Economy and Employment:</p> <p>The policies listed below provide the site-specific detail of where business development is to be located within the LLDC area and, as the impacts are considered to be of a similar type, they have been considered together:</p> <p>BEE1, BEE2, BEE3, BEE4, BEE7, BEE8 and BEE10</p>	<p>Policies that promote development for employment and education could have an adverse effect on air quality as a result of increased traffic emissions. They could also contribute to increased water demands and therefore water abstraction.</p> <p>The probability of workers increasing recreational pressure on the European sites is considered insignificant, given the distance between the Local Plan area and the sites, and the availability of alternative recreational space closer to the employment hubs.</p> <p>Policy HBE7 sets out how developments will be expected to minimise carbon dioxide emissions, and policy HBE8 requires the incorporation of the highest standards of sustainability and design.</p> <p>The policies aim to focus development for business into 'employment hubs' within the LLDC area and into Strategic Industrial Land as identified in the London Plan (BEE1, 2, 3 and 4). New retail development will be focussed on existing town/ neighbourhood centres, as these have access to one or more public transport hubs (BEE7). Outside of these centres, any retail, commercial or leisure proposals should be small-scale and provide services to the immediate community (BEE8). Proposals to provide educational facilities should also be located within or adjacent to the employment hubs and have easy access to public transport hubs (BEE10).</p> <p>In addition, other policies in the Local Plan, such as T8, support the development of public transport schemes, whilst T4 provides for provision for pedestrians and cyclists and T5 refers to the production of Travel Plans for new developments which actively promote public transport, cycling and walking. It is acknowledged within the Local Plan that much of the public transport improvements are already underway.</p> <p>Policy NE7 seeks to ensure that there will be no worsening of air quality within the LLDC area through the design and construction of proposed developments.</p> <p>Policy IN3 supports measures to reduce water demand and use and to extend the non-potable supply network that has been installed in the Queen Elizabeth Olympic Park.</p> <p>As the European Sites are several kilometres outside the Local Plan area, it is impossible to quantify the amount of air pollution that can be contributed to proposed development within the LLDC area. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the Local Plan area through minimising vehicle use and the focussing of proposed development. Associated demands on water supply will also be minimised (as far as a local authority can influence this) through the implementation of Policy IN3.</p> <p>The policies above also aim to minimise any impacts of climate change on the European sites as far as possible.</p> <p>It is therefore concluded that the implementation of Policies BEE1, BEE2, BEE3, BEE4, BEE7, BEE8 and BEE10 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar.</p>	<p>Land allocation for employment use is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified European sites.</p> <p>Core Strategies for the local boroughs that make up the LLDC area (Hackney, Tower Hamlets, Newham and Waltham Forest) have also been through the HRA process.</p> <p>All of these HRAs concluded that there would be no significant effect on European sites either alone, or in-combination with, other plans and projects, with regard to air quality, or through an increase in water demand, by the implementation of the policies contained within the individual Core Strategies. Although it is acknowledged that many 'insignificant' impacts can in theory add up to a 'significant' impact, the LLDC area comprises only portions of the previous four London Boroughs, with a corresponding decrease in an already insignificant impact. The distance of the LLDC area to the European Sites also means that potential indirect impacts are reduced further.</p> <p>The Legacy Communities Scheme provides for a phased mixed-use development for land within the Queen Elizabeth Olympic Park. It includes proposals on how to reduce energy and water use, maximise green infrastructure and promote the principles of sustainable development. All these factors should help reduce any potential indirect impacts on the European sites several kilometres away, and therefore the in-combination effects when considered with other development proposals in the Local Plan area are judged to be insignificant.</p> <p>Finally, the policies and proposals contained within both the Mayor's Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on European sites in the medium to long term.</p> <p>It is therefore concluded that the implementation of Policies BEE1, BEE2, BEE3, BEE4, BEE7, BEE8 and BEE10 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction)</p> <p>Epping Forest SAC (from decreases in air quality)</p>	<p>B</p>	<p>Recommend cross-references in Policies BEE1, 2 and 3 to policies that support sustainability in design, minimising carbon dioxide emissions, support public transport, reduce water demand and improve air quality in line with sustainable development objectives and in order to reduce impacts on protected sites.</p> <p>Strengthen the provisions within policy NE7 to cross reference to policies that seek to minimise emissions.</p>	<p>No LSE</p>
<p>Housing:</p> <p>Policy H1 provides for an annual net increase of over</p>	<p>Policies that promote housing development could have an adverse effect on air quality as a result of increased traffic emissions. They could also contribute to increased water demands and therefore</p>	<p>As with all London Boroughs, the LLDC Local Plan is directed by the London Plan on a range of housing policies. Policy 7.19 of the London Plan</p>	<p>Lee Valley SPA/Ramsar (from increased</p>	<p>B</p>	<p>Recommend inclusion of reference to public transport links for</p>	<p>No LSE</p>

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
<p>1,432 homes, and Policy H3 states an annual target of at least 441 affordable homes. It also identifies locations for housing development.</p> <p>As the potential impacts on the European sites from the implementation of these policies are considered to be similar, the policies have been considered together.</p>	<p>water abstraction. Furthermore, an increase in recreational pressure on European sites could result due to the corresponding rise in population.</p> <p>Planning consent has already been given for approximately 82% of the total projected growth in the area. Housing delivery is to be completed in stages, alongside necessary infrastructure, as detailed in the Infrastructure Delivery Plan.</p> <p>Policy HBE7 sets out how developments will be expected to minimise carbon dioxide emissions, and policy HBE8 requires the incorporation of the highest standards of sustainability and design.</p> <p>In addition, other policies in the Local Plan, such as T8, support the development of public transport schemes, whilst T4 provides for provision for pedestrians and cyclists and T5 refers to the production of Travel Plans for new developments which actively promote public transport, cycling and walking. It is acknowledged within the Local Plan that much of the public transport improvements are already underway.</p> <p>Policy NE7 seeks to ensure that there will be no worsening of air quality within the LLDC area through the design and construction of proposed developments.</p> <p>Policy IN3 supports measures to reduce water demand and use and to extend the non-potable supply network that has been installed in the Queen Elizabeth Olympic Park.</p> <p>Policy NE1 aims to achieve integration between the natural and built environment by maximising the provision of natural habitat. NE8 aims to contribute to the enhancement and management of green infrastructure within the Local Plan area. Policies NE9, NE10 and NE11 also relate to the provision of open space and parklands for recreational use.</p> <p>As for the Business, Economy and Employment (BEE) policies, it is considered that these policies together provide a coherent strategy for proposals that actively encourage the use of public transport, minimise water use and air pollution within the Local Plan area, which should also minimise any adverse impact on European Sites that are outside the Local Plan area.</p> <p>The southern extent of Epping Forest SAC is located approximately 2.9km to the north-east of the Local Plan area, and the southern extent of the Lee Valley SPA/Ramsar is situated approximately 3.4km to the north-west. Although the potential exists for increased disturbance through a rise in visitor pressure as the housing developments are progressively completed, the risk is low that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations, particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure within the Plan lifetime. In addition, car ownership in the Boroughs that make up the LLDC area is traditionally low, further reducing the likelihood of an increase in recreational pressure from the Local Plan area.</p> <p>The policies above also aim to minimise any impacts of climate change on the European sites as far as possible.</p> <p>It is therefore concluded that the implementation of Policies H1 and H3 will have no significant adverse impacts on the conservation</p>	<p>requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified European sites.</p> <p>Core Strategies for the local boroughs that make up the LLDC area (Hackney, Tower Hamlets, Newham and Waltham Forest) have also been through the HRA process.</p> <p>All of these HRAs concluded that there would be no significant effect on European sites either alone, or in-combination with, other plans and projects, with regard to air quality, or through an increase in water demand, by the implementation of the policies contained within the individual Core Strategies. Although it is acknowledged that many 'insignificant' impacts can in theory add up to a 'significant' impact, the LLDC area comprises only portions of the previous four London Boroughs, with a corresponding decrease in an already insignificant impact. The distance of the LLDC area to the European Sites also means that potential indirect impacts are reduced further.</p> <p>Public access to the Walthamstow Reservoirs component of the Lee Valley SPA/Ramsar is currently effectively managed by permits issued by Thames Water. The priority to manage access so that the nature conservation importance of the site is not compromised (e.g. closing paths to prevent disturbance on all sides of the reservoirs at sensitive times of year) will remain throughout the implementation of the proposals to open the Reservoirs to wider public access. Therefore, a combined increase in recreational pressure from increasing numbers of residents is not anticipated.</p> <p>Finally, the policies and proposals contained within both the Mayor's Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on European sites in the medium to long term.</p> <p>It is therefore concluded that the implementation of Policies H1 and H3 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar in-combination with other plans or projects.</p>	<p>water abstraction and increased recreational pressure)</p> <p>Epping Forest SAC (from decreases in air quality and increases in recreational pressure)</p>		<p>housing developments in Policy H1 and cross-referencing to policies that support sustainability in design, minimise carbon dioxide emissions, support public transport, reduce water demand and improve air quality in line with sustainable development objectives and in order to reduce impacts on protected sites.</p>	

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
	objectives of Epping Forest SAC or Lee Valley SPA/ Ramsar site.					
Infrastructure: Policy IN1 relates to the provision of new and existing community infrastructure	<p>Policy IN1 encourages the provision of new and existing community infrastructure as part of new large scale development. As such, the potential impacts on European sites are considered to be the same as for the Business, Economy and Employment (BEE) policies identified above (i.e. effect on air quality as a result of increased traffic emissions, an increase in water demand and therefore water abstraction).</p> <p>It is considered that there will be no increase in recreational pressure on European sites as a result of the construction of community facilities. Such facilities provide a focus for activities that may even reduce the likelihood of increased recreational pressure.</p> <p>The assessment of potential effects through the implementation of this policy is therefore the same as for the BEE policies, i.e. it is concluded that the implementation of Policy IN1 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar.</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the BEE policies, as provisions for new community facilities will form an integral part of any large scale development proposal.</p> <p>It is therefore concluded that the implementation of Policy IN1 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction)</p> <p>Epping Forest SAC (from decreases in air quality)</p>	B	No requirement	No LSE
Infrastructure: Policy IN2 concerns the provision of energy infrastructure and heat networks.	<p>No adverse impacts are identified from proposals to expand the existing heat network infrastructure. However, the broad policy statement supporting proposals for renewable energy generation could have potential impacts upon European sites depending upon how they are implemented.</p> <p>For example, there is a theoretical possibility that should proposals for wind turbines within the Local Plan area be brought forward, then these could interfere with the flight paths of birds which are features of the SPA/Ramsar.</p> <p>It is considered appropriate that any proposals should be subject to environmental assessment, which may or may not include an HRA.</p> <p>The distance of the SPA from the Local Plan area, the number of high rise buildings and other structures already surrounding the SPA, and the fact that the vast majority of wintering shoveler and gadwall will come from a northerly/north-easterly direction, reduce the risk of any significant adverse effect.</p>	<p>Policy 5.7 of the London Plan identifies that all renewable energy systems should be located and designed to minimise any impacts on biodiversity and the natural environment.</p> <p>No other renewable energy projects have been identified that could have an adverse impact on Lee Valley SPA/Ramsar.</p> <p>It is therefore concluded that the implementation of Policy IN2 will have no significant adverse impacts on the conservation objectives of Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (disturbance to qualifying features)</p>	F	<p>May be appropriate to include a caveat '...subject to other policies in this Plan <i>and other regulatory requirements</i>'.</p> <p>This should acknowledge the possibility that future proposals may need to be subject to a more detailed environmental assessment process, which may incorporate project-level HRA.</p>	<p>Cannot conclude No Likely Significant Effects at this stage – depends on how the policy is implemented.</p> <p>If the mitigation measures proposed are included in the final policy, it is considered a conclusion of no LSE will be achievable.</p>
Infrastructure: Policy IN4 concerns policies for new waste management facilities.	<p>The potential effects on Epping Forest SAC of this policy rely entirely how it is implemented in due course.</p> <p>Depending upon what form proposals for new waste management facilities take (i.e. waste incinerators) the potential exists to affect Epping Forest SAC through a reduction in air quality.</p> <p>Environment Agency guidance¹ indicates that designated sites within 10km of a point source pollutant emission should be considered as a sensitive receptor. It is therefore anticipated that any proposal within the Local Plan area would be subject to an air quality assessment, and mitigation measures implemented accordingly to minimise the potential impacts on European sites.</p> <p>¹ IPPC H1 Guidance for the Environmental Assessment and Appraisal of Best Available Technologies, Environment Agency</p>	<p>Policy 5.17 of the London Plan identifies opportunities for increasing waste capacity through, for example, producing energy through biomass.</p> <p>The Local Plan area is covered by the Waste Development Plans for East and North London. Both of these Plans have been subject to the HRA process and concluded that there would be no significant effect on any features of European Sites.</p> <p>No other waste projects have been identified that could have an adverse impact on Epping Forest SAC.</p> <p>It is therefore concluded that the implementation of Policy IN4 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC in-combination with other plans or projects.</p>	<p>Epping Forest SAC (from decreases in air quality)</p>	F	<p>Proposals for waste management facilities need to be examined on a case-by-case basis. Recommend strengthening of this policy to include a caveat that prevents potentially damaging proposals from occurring (unless the potential effects on European sites/ environment have been resolved.</p>	<p>Cannot conclude No Likely Significant Effects at this stage – depends on how the policy is implemented.</p> <p>If the mitigation measures proposed are included in the final policy, it is considered a conclusion of no LSE will be achievable.</p>

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
<p>Transport and Connectivity: Policy T7 concerns transport improvements and Policy T8 supporting public transport and highway schemes. Policy T9 relates to the transport function of the waterways.</p> <p>As the potential impacts on the European sites from the implementation of these policies are considered to be similar, the policies have been considered together.</p>	<p>The majority of transport improvements required in the LLDC area are already in place. Of the key projects identified under Policies T7 and T8 as being required to support development delivery in particular locations, it is considered that potential adverse impacts on air quality affecting Epping Forest could result, primarily from road projects and an increase in traffic on the waterways.</p> <p>It is important to note that transport schemes will generally be delivered by other agencies, such as Transport for London, Network Rail and the four London Boroughs, and therefore LLDC will work in partnership with these agencies to facilitate delivery of these schemes.</p> <p>However, no significant decrease in air quality is expected as a result of these schemes for the following reasons:</p> <ul style="list-style-type: none"> • The already significant levels of background air pollution over Epping Forest caused by the highly urban and industrialised nature of the surrounding environment, combined with the distance of the schemes from Epping Forest SAC, means that any increase in air pollution during construction and operation of the improved transport schemes is likely to be insignificant. • Improvements in traffic flow means that cars will run more efficiently, thereby reducing emissions. • The general trend in NO_x levels is downwards (primarily due to improvements in technology). • Further investment in public transport (Policy T8) and in the provision for pedestrians and cyclists (Policy T5) should encourage more people out of their cars • Policy NE7 seeks to ensure that there will be no worsening of air quality within the LLDC area. <p>It is therefore concluded that the implementation of Policies T7, T8 and T9 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC.</p>	<p>Policy 6.1 of the London Plan sets out the strategic approach to be taken to integrating transport and development and emphasises measures to reduce car journeys.</p> <p>Core Strategies for the local boroughs of Hackney, Tower Hamlets, Newham and Waltham Forest that make up the LLDC area have also been through the HRA process.</p> <p>All of these HRAs concluded that there would be no significant air quality effect on European sites either alone, or in-combination with other plans and projects associated with the implementation of the policies contained within the individual Core Strategies. The distance of the LLDC area to the Epping Forest SAC also means that potential indirect impacts are reduced.</p> <p>Policies contained within the Lee Valley Park Development Framework were also assessed with regard to the promotion of boat traffic. This document has also been subject to an HRA Screening. No policies were found to have any adverse impact on European Sites, including Epping Forest SAC.</p> <p>Furthermore, the policies and proposals contained within the Mayor's Air Quality Strategy promote the improvement of air quality, which should also help reduce any adverse impacts on European sites in the medium to long term.</p> <p>It is therefore concluded that the implementation of Policies T7, T8 and T9 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC in-combination with other plans or projects.</p>	Epping Forest SAC (from decreases in air quality)	B	No requirement	No LSE
<p>Sub Area 1: Hackney Wick and Fish Island SA1.7 concerns heat networks and renewable energy.</p>	<p>The basic premise of Policy SA1.7 is the same as IN2 in that it supports proposals for renewable energy infrastructure.</p> <p>Although this sub-area is identified as being a preferred location for renewable energy development, specific areas where proposals may be located are not identified. Therefore, the potential impact of policies depends entirely on how they are implemented in due course through the development management process.</p> <p>As such, the assessment of potential impacts on the Lee Valley SPA/Ramsar is considered to be the same as for Policy IN2 i.e. the potential effects of this policy rely entirely how it is implemented in due course.</p>	As for Policy IN2 above.	Lee Valley SPA/Ramsar (disturbance to qualifying features)	F	As for Policy IN2 above.	As for Policy IN2 above.
<p>Sub Area 1: Hackney Wick and Fish Island Site allocations, which set out where in the sub-area new development is to take place, are: Planning Delivery Zone 4 (PDZ4) - Sweetwater and PDZ5 – East Wick; and</p>	<p>These site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>Any assessment of potential impacts needs to consider the same issues as that for the BEE policies and the Housing policies.</p> <p>These are as follows:</p> <ul style="list-style-type: none"> • potential adverse effects on air quality as a result of increased traffic emissions; 	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the BEE and Housing policies, as the site allocations form part of the total allocations under these policies.</p> <p>The in-combination assessment also examined the Area Action Plan for Hackney Wick, the HRA of which concluded that there would be no significant effects on European sites as the</p>	Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure) Epping Forest SAC (from	B	Recommend strengthening this policy further by cross-referencing to provisions for sustainable development in Policies BEE1, BEE2, BEE3 and H1.	No LSE

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
Policy SA1.3: neighbourhood centre.	<ul style="list-style-type: none"> potential increased water demand and therefore water abstraction; and a potential increase in recreational pressure due to the corresponding rise in population. <p>As for the assessment of the BEE and Housing policies, policies and proposals that actively encourage the use of public transport minimise water use and air pollution within the Local Plan area (thus minimising any adverse impact on European Sites that are outside the Local Plan area) and also help reduce the impacts of climate change.</p> <p>In addition, with respect to recreational pressure, the risk is low that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations, particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure and the importance of enhancing biodiversity within the Plan lifetime.</p> <p>It is therefore concluded that the implementation of Policy SA1.3 and the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar.</p>	<p>policies were in line with the Hackney Core Strategy (which was also subject to an HRA). The same conclusion has been reached for this assessment, in line with the LLDC Local Plan policies.</p> <p>It is therefore concluded that the implementation of Policy SA1.3 and the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	decreases in air quality and increases in recreational pressure)			
<p>Sub Area 2: North Stratford and Eton Manor:</p> <p>Site allocations, which set out where in the sub-area new development is to take place, are:</p> <p>Chobham Farm, East Village and Chobham Manor</p>	<p>These site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>An assessment of potential effects needs to consider the same issues as that for the BEE policies and the Housing policies.</p> <p>As for the assessment of the BEE and Housing policies, policies and proposals that actively encourage the use of public transport minimise water use and air pollution within the Local Plan area (thus minimising any adverse impact on European Sites that are outside the Local Plan area) and also help reduce the impacts of climate change.</p> <p>In addition, with respect to recreational pressure, the risk is low that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations, particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure and the importance of enhancing biodiversity within the Plan lifetime.</p> <p>It is therefore concluded that development of the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar.</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the BEE and Housing policies, as the site allocations form part of the total allocations under these policies.</p> <p>It is therefore concluded that development of the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure).</p> <p>Epping Forest SAC (from decreases in air quality and increases in recreational pressure).</p>	B	Recommend strengthening this policy further by cross-referencing to provisions for sustainable development in Policies BEE1, BEE2, BEE3 and H1.	No LSE
<p>Sub Area 3: Central Stratford and the Southern Queen Elizabeth Olympic Park</p> <p>Policy SA3.1 concerns proposals for a Metropolitan Centre, in compliance with policies BEE1 and BEE7.</p> <p>Policy SA3.7 deals with development within the Greater Carpenters District (one of the site allocations).</p>	<p>These site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>An assessment of potential effects needs to consider the same issues as that for the BEE policies and the Housing policies.</p> <p>As for the assessment of the BEE and Housing policies, policies and proposals that actively encourage the use of public transport, and minimise water use and air pollution within the Local Plan area, should minimise any adverse impact on European Sites that are outside the Local Plan area and help reduce the impacts of climate change.</p> <p>In addition, with respect to recreational pressure, the risk is low that</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the BEE and Housing policies, as the site allocations form part of the total allocations under these policies.</p> <p>It is therefore concluded that implementation of Policies SA3.1 and SA3.7 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure).</p> <p>Epping Forest SAC (from decreases in air quality and increases in recreational</p>	B	Recommend strengthening this policy further by cross-referencing to provisions for sustainable development in Policies BEE1, BEE2, BEE3 and H1.	No LSE

Local Plan Policy	Potential Effects	In-combination effects with other plans or projects	European Sites Potentially Affected	Assessment Category * (see Appendix B)	Avoidance and Mitigation Potential	Conclusion of Likely Significant Effects (LSE) at this stage
	<p>residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations, particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure and the importance of enhancing biodiversity within the Plan lifetime.</p> <p>It is therefore concluded that implementation of Policies SA3.1 and SA3.7 will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar.</p>		pressure).			
<p>Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads</p> <p>Policy SA4.1 promotes the delivery of a District Centre. Site allocations, which set out where in the sub-area new development is to take place, are: Bromley-by-Bow, Pudding Mill, Sugar House Lane and Three Mills.</p>	<p>All these site allocations have the potential to indirectly affect European Sites through the construction and operation of retail, employment and residential development.</p> <p>An assessment of potential effects needs to consider the same issues as that for the BEE policies and the Housing policies.</p> <p>As for the assessment of the BEE and Housing policies, policies and proposals that actively encourage the use of public transport, and minimise water use and air pollution within the Local Plan area, should minimise any adverse impact on European Sites that are outside the Local Plan area and help reduce the impacts of climate change.</p> <p>In addition, with respect to recreational pressure, the risk is low that residents in the LLDC area will choose to visit the habitats of the European Sites in preference to more local destinations, particularly given the emphasis that has been placed within the Local Plan on the contributions to be made to green and blue infrastructure and the importance of enhancing biodiversity within the Plan lifetime.</p> <p>It is therefore concluded that implementation of Policy SA4.1 and the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar.</p>	<p>The assessment of potential in-combination effects through the implementation of this policy is the same as for the BEE and Housing policies, as the site allocations form part of the total allocations under these policies.</p> <p>It is therefore concluded that implementation of Policy SA4.1 and the site allocations will have no significant adverse impacts on the conservation objectives of Epping Forest SAC or Lee Valley SPA/Ramsar in-combination with other plans or projects.</p>	<p>Lee Valley SPA/Ramsar (from increased water abstraction and increased recreational pressure).</p> <p>Epping Forest SAC (from decreases in air quality and increases in recreational pressure).</p>	B	<p>Recommend strengthening this policy further by cross-referencing to provisions for sustainable development in Policies BEE1, BEE2, BEE3 and H1.</p>	No LSE
<p>Sub Area 4: Pudding Mill, Bromley-by-Bow and Mill Meads</p> <p>Policy SA4.5 relates to heat networks and renewable energy.</p>	<p>The basic premise of Policy SA4.5 is the same as IN2 in that it supports proposals for renewable energy infrastructure.</p> <p>Although this sub-area is identified as being a preferred location for renewable energy development, specific areas where proposals may be located are not identified. Therefore the impact of policies depends entirely on how they are implemented in due course through the development management process.</p> <p>As such, the assessment of potential impacts on the Lee Valley SPA/Ramsar is considered to be the same as for Policy IN2 (i.e. the potential effects of this policy rely entirely how it is implemented in due course).</p>	As for Policy IN2 above.	Lee Valley SPA/Ramsar (disturbance to qualifying features)	F	As for Policy IN2 above.	As for Policy IN2 above.

5.6 Screening Summary and Recommendations

Following the initial screening of the LLDC Local Plan, a number of policies were screened out completely from further assessment on the basis either of no identifiable impact pathway linking the policies with the European Sites or that there will be no foreseeable adverse impact on European sites through policy implementation.

Policies were selected for further (detailed) screening on the basis that there may be potential impacts on European Sites if they are implemented without any mitigation or avoidance measures. This has also included a categorisation of the potential effects in line with Natural England Guidance.²²

Potential impacts identified include:

- Increases in recreational pressure causing degradation of habitats and disturbance to species;
- Decreases in air quality causing degradation of habitats;
- Increases in water abstraction causing degradation of habitats;
- Effects of climate change.

The detailed screening of the LLDC Local Plan policies (Table 5-2) has identified that the vast majority of the policies will have no significant effects on the features of the Lee Valley SPA/Ramsar or Epping Forest SAC, either on their own or in-combination with other plans or projects. The only policies where any potential exists for indirect effects on the European sites are those which will need to be assessed at a lower tier (individual project level).

These policies are as follows:

- Policies IN2, SA1.7 and SA4.5 concerning the provision of energy infrastructure;
- Policy IN4 concerning proposals for new waste management facilities.

Those effects with the potential to be significant are disturbance effects on birds (resulting from the construction of wind turbines interfering with flight lines), and a potential decrease in air quality affecting the habitats of Epping Forest SAC through the construction of any waste incinerators. However, it is considered that any disturbance or air quality effects are very unlikely to be significant, given the distance between the European Sites and the developments likely to arise from the LLDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

In all cases, therefore, it is considered that the need for Appropriate Assessment of the final policy will be avoided with the strengthening of the existing policies to cross-reference to policies that will reduce impacts on European sites (such as air quality policies, water resource management policies) and the provision of caveats regarding environmental assessment through the development process. These will provide a further 'safety net' to help ensure that significant damage to European Sites is avoided.

²² Revised Draft Guidance. The Habitats Regulations Assessment of Local Plan Documents. David Tyldesley and Associates for Natural England (2009).

It is therefore recommended that the final Local Plan policies are strengthened in line with the recommendations included in the 'Avoidance and Mitigation' column in Table 5-2. As an added control, it is also recommended that the Local Plan includes text that ensures project-level HRA is carried out (if required) prior to development that may have impacts on European sites (this especially applies to developments under the policies listed above). It should also be ensured that consent for any development should only be granted if the project-level HRA is able to demonstrate that adverse effects will not occur on the designation and its qualifying habitats / species.

6 CONCLUSION

This HRA Screening of the Draft LLDC Local Plan has considered the potential implications of the plan for European Sites near to the borough boundary.

It is important to note that none of the policies set out in the LLDC Local Plan would lead to direct impacts upon European Sites.

The only policies where any potential exists for indirect effects on the European sites are those which will need to be assessed at a lower tier (individual project level). However, it is considered that potential effects are very unlikely to be significant, given the distance between the European Sites and the developments likely to arise from the LLDC Local Plan policies, as well as the standard mitigation measures that are required of such developments (such as pollution prevention).

It is considered that these potential effects can readily be mitigated, both at the plan stage (through minor modifications to the wording of relevant policies) and at the project-specific HRA stage.

The assessment of in-combination effects of various plans and policies revealed that it is not considered that the LLDC Local Plan would contribute to significant in-combination effects.

It has therefore been concluded that, **assuming the policies are strengthened further in line with the recommendations in Table 5-2**, the LLDC Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects. **As such, it is not proposed to undertake Appropriate Assessment.**

We seek Natural England's opinion and agreement or otherwise with this conclusion.

Appendix A

European Sites

Lee Valley SPA and Ramsar

Site Characteristics

The Lee Valley SPA and Ramsar is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons, and former gravel pits that support a range of man-made, semi-natural, and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular gadwall (*Anas strepera*) and shoveler (*A. clypeata*), which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering bittern (*Botaurus stellaris*).

The Lee Valley SPA/Ramsar consists of four Sites of Special Scientific Interest (SSSIs) including: Turnford and Cheshunt Pits SSSI, Rye Meads SSSI, Amwell Quarry SSSI, and Walthamstow Reservoirs SSSI. Of these sites, Walthamstow Reservoirs SSSI lies within the London Boroughs area, Turnford and Cheshunt Pits SSSI lies within the Hertfordshire/Essex border, and the remainder lie within Hertfordshire. Walthamstow Reservoirs SSSI is the closest component of the Lee Valley SPA/Ramsar site, at a distance of 3.4km north-west from the LLDC Local Plan boundary.

Qualifying Features

Lee Valley SPA

The Natura 2000 Standard Data Form, for the Lee Valley SPA was compiled when the site was designated in 2000. In 2001, the JNCC undertook a Review of UK SPAs, which resulted in the updating of many SPA citations, including the Lee Valley SPA.

The changes as a result of the SPA review are likely to be the subject of formal changes to the SPA designation in due course, at present the legally protected species remain those in the original citation. However, for the purposes of this assessment, the species listed as a result of the SPA review will be used. This means that the following species will be included in the assessment:

The site qualifies under Article 4.1 of the Directive (79/409/EEC) by regularly supporting overwinter populations of European importance of the following species:

- Bittern, 6% of the wintering population in Great Britain (5 year peak mean, 1992/3-1996/7)

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species overwinter:

- Shoveler (North-western/Central Europe), 1% of the population (5 year peak mean, 1993/4-1997/8)
- Gadwall (North-western Europe), 1.5% of the population (5 year peak mean, 1993/4-1997/8)

Lee Valley Ramsar

With respect to the Ramsar designation, the Lee Valley is designated as it qualifies under Criteria 2 and 6, supporting species of international importance.

Ramsar Criterion 2 (supporting vulnerable, endangered, or critically endangered species or threatened ecological communities):

- The site supports the nationally scarce plant species whorled water-milfoil (*Myriophyllum verticillatum*) and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Ramsar Criterion 6 (regularly supporting 1% of the individuals in a population of one species or subspecies of waterbird):

Species with peak counts in spring/autumn:

- Shoveler (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3).

Species with peak counts in winter:

- Gadwall (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3).

Conservation Objectives for the Lee Valley SPA

The Conservation Objectives for the Lee Valley SPA, as identified by Natural England²³, are listed below.

Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features (see below), ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.

Subject to natural change, to maintain or restore:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The populations of the qualifying features;
- The distribution of the qualifying features within the site.

Qualifying Features:

- A021 *Botaurus stellaris*; Bittern (Non-breeding)
- A051 *Anas strepera*; Gadwall (Non-breeding)
- A056 *Anas clypeata*; Shoveler (Non-breeding)

²³ Natural England, European Site Conservation Objectives for Lee Valley Special Protection Area Site Code: UK9012111

Conservation Status and Vulnerability of the Lee Valley SPA/Ramsar

During the most recent condition assessment undertaken by Natural England in November 2012, Amwell Quarry SSSI, Rye Meads SSSI, and Turnford and Cheshunt Pits SSSI were all considered to have 100% of their area in favourable condition (i.e. meeting their conservation objectives but with scope for enhancements). Walthamstow Reservoirs SSSI was reported to have 100% of its area in an unfavourable but recovering condition.

Lee Valley SPA is reported to be vulnerable to two main influences: discharge of waste and human recreation. Eutrophication exists in areas of the SPA as a result of a number of influences, including: sewage outfalls, surface runoff, and ground water pollution. Human disturbance of the European site through recreation causes disturbance of wintering bird populations, although zonation of the site has regulated this disturbance. To a lesser extent, there is also pressure from public demand for water supply during periods of drought.

Epping Forest SAC

Epping Forest SAC covers an area of 1,605ha within Essex and parts of east London, with 70% of the site comprising broadleaved deciduous woodland. Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Its semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most of the woodland is characterised over-mature pollards. Its long history of pollarding, and resultant large number of veteran trees, has ensured that the site is also rich in fungi and dead-wood invertebrates, particularly the stag beetle (*Lucanus cervus*), for which the site is one of its major strongholds. Epping Forest also includes a variety of unimproved acid grasslands, which have become uncommon elsewhere in Essex and the London area.

Epping Forest is underpinned by one SSSI, Epping Forest SSSI. The SAC is located 2.9km from the LLDC Local Plan boundary.

Qualifying Features of Epping Forest SAC

Annex I habitats that are a primary reason for selection of this site:

- 9120 Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion robori-petraeae* or *Ilici-Fagenion*)

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- 4010 Northern Atlantic wet heaths with *Erica tetralix*
- 4030 European dry heaths

Annex II species that are a primary reason for selection of this site:

- 1083 Stag beetle

Conservation Objectives for Epping Forest SAC

The Conservation Objectives for the Epping Forest SAC, as specified by Natural England²⁴, are listed below.

Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.

Subject to natural change, to maintain or restore:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

Qualifying Features:

- H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
- H4030. European dry heaths
- H9120. Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils
- S1083. *Lucanus cervus*; Stag beetle

Conservation Status and Vulnerability of Epping Forest SAC

Following the most recent condition assessment undertaken by Natural England in November 2012, 83.66% of Epping Forest SSSI is considered to be in favourable (or unfavourable but recovering) condition, with 14.51% considered to be unfavourable but with no change and 1.83% in unfavourable condition and declining. The primary reason for the unfavourable and declining condition at the site is believed to be air pollution, in particular the effects of excessive levels of oxides of nitrogen and other pollutants, and the related deposition of acidity and of nitrogen.

The most recent condition assessment of the underpinning component part of Epping Forest SSSI undertaken in January 2010,²⁵ concluded that it was in an 'unfavourable no change' state,

²⁴ Natural England, European Site Conservation Objectives for Epping Forest Special Area of Conservation Site code: UK0012720

²⁵ Unit 136, Hollow Flats site condition assessment accessed via <http://www.sssi.naturalengland.org.uk>

primarily due to the excessive levels of nitrous oxides and acid deposition that the site was subject to.

Absence of historic pollarding practices and the presence of atmospheric pollutants from the surrounding urban area are considered to be responsible for the decline in lichen and moss populations at the site. Introduced management regimes are helping to reverse the decline. Epping Forest SAC is also subject to a comprehensive management plan, which is designed to improve the habitats for the Annex II species for which the site is designated.

Appendix B

Categories taken from Natural England draft guidance

Potential Effect Categories

Category	Broad Effects	Conclusion for Likely Significant Effects (LSE) at this Stage
Category A	Elements of the plan that would have no negative effect on a European site at all.	No LSE
Category B	Elements of the plan that could have an effect, but the likelihood is there would be no significant effect on a European site either alone or in combination with other elements of the same plan, or other plans or projects.	No LSE
Category C	Elements of the plan that could or would be likely to have a significant effect alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted.	LSE
Category D	Elements of the plan that would be likely to have a significant effect in combination with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.	LSE
Category E	Elements of the plan the effects of which will be more appropriate for lower tier assessments	It cannot be concluded that there would be no LSE at this stage, therefore assume LSE
Category F	Elements of the plan the effect of which depends on how the plan is implemented.	It cannot be concluded that there would be no LSE at this stage, therefore assume LSE

Likely Effect Categories

Category	Sub category	Types of policy for consideration
Category A: No negative effect	A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy
	A2	Policies intended to protect the natural environment, including biodiversity.
	A3	Policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site.
	A4	Policies that positively steer development away from European sites and associated sensitive areas.
Category B: No significant effect		Effects are trivial or ' <i>de minimis</i> ', even if combined with other effects.
Category C: Likely significant effect alone	C1	The policy could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it.
	C2	The policy could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures.
	C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site.
	C4	Policies for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, which will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided.

Category	Sub category	Types of policy for consideration
	C5	Any other policies that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning'.
	C6	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment.
Category D: Likely significant effects in combination	D1	The policy alone would not be likely to have significant effects but if its effects are combined with effects of other policies or proposals provided for or coordinated by the LDD (internally) the cumulative effects would be likely to be significant.
	D2	Policies that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects , and possibly the effects of other developments provided for in the LDD as well, the combined effects would be likely to be significant.
	D3	Proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites.
Category E: Cannot conclude no LSE at this stage – lower tier assessment	E1	A policy would have no effect where development could occur through the policy itself, because it is implemented through later policies in the same DPD, which are more detailed and therefore more appropriate to assess for their effects on European sites and associated sensitive areas. These kinds of policies may be found in the Core Strategy where a broad quantity of development may be specified as being delivered through a more specific policy in a later chapter or section of the DPD.
	E2	A policy that makes provision for a quantity/type of development (and may indicate one or more broad locations e.g. a particular part of the plan area) but the detailed location of the development is to be selected following consideration of options in later, more specific DPD. The consideration of options in the later DPD will need to assess potential effects on European sites.
Category F		<p>Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site.</p> <p>In these specific circumstances where there is uncertainty about the way in which aspects of a plan may be implemented, it may be appropriate for policies to contain restrictions or caveats in order to exclude support for potentially damaging proposals. It is advised that the caveat could be added during the screening stage whereupon the policy could be reassessed and placed in Category A or B.</p> <p>Alternatively the policy could be taken forward to appropriate assessment to check that the caveat, when added, would avoid an adverse effect on the integrity of the European site.</p> <p>A caveat may relate to proposals not being in accordance with the development plan or may prevent the potentially damaging proposals from occurring unless the potential effect on the European site has been resolved. For example, the development cannot take place until related infrastructure is in place, having passed the tests of the Habitats Regulations.</p>



Appendix 7:

London Legacy Development Corporation Local Plan Consultation Document

Supporting Document: Draft Equality Impact Assessment October 2013

Published by London Legacy Development Corporation
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JCT Business Solutions was commissioned by the London Legacy Development Corporation to undertake an independent Equality Impact Assessment as an iterative process during the development of the Draft London Legacy Development Corporation Local Plan.

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1 Executive Summary

1.1 Equality Impact Assessment

This Equality Impact Assessment (EqIA) sets out how the London Legacy Development Corporation (LLDC) has addressed the equality impacts of the Local Plan Consultation Document. The EqIA has been published alongside the Local Plan Consultation Draft for consultation.

In addition to assessing how the Local Plan Consultation Document has addressed the equality issues identified through Local Plan Interim Consultation, the EqIA will assess how issues and impacts raised from previous consultation and engagement work have been addressed. Since 2008 consultation and engagement for the area has taken place for the following strategic documents:

- Olympic Delivery Authority: Olympic Park Planning Permission 2008;
- Legacy Masterplan Framework 2008-2010; and
- Olympic Park Legacy Company: Legacy Communities Scheme 2011.

The EqIA considers a range of equality, social and health and wellbeing issues set against the Local Plan vision and objectives. The analysis fulfils the LLDC duties under the Equality Act 2010 to:

- ensure policies do not have an unintentional negative impact on traditionally disadvantaged or excluded groups;
- enhance, wherever possible, the positive impact on those groups, and demonstrate its commitment to promoting equality and inclusion;
- show how LLDC is meeting its positive duty to promote equality and good relations between diverse communities and to ensure there is no illegal discrimination and;
- act as a 'sense-check' to ensure policies/strategies and functions are designed with the user in mind.

There are nine recognised protected characteristics in the Equality Act 2010. The EqIA provides a summary of the Local Plan sections and explains the likely impacts for the following equality groups:

- Age: where this is referred to, it refers to a person of a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
- Disability: a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- Gender reassignment: the process of transitioning from one gender role and status to another.
- Race: refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- Religion or belief: religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect a person's life choices or the way they live for it to be included in the definition.
- Sex: a male or female.
- Sexual orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Alongside assessing the impact with regard to equality groups, the report will also consider the impact in relation to economic disadvantage and community cohesion.

Key stages of the EqIA are:

- Stage 1 Set the context and establish a baseline;
- Stage 2 Prepare report for review and consultation;
- Stage 3 Consultation;
- Stage 4 Review report and incorporate additional information;
- Stage 6 Report subject to review by Secretary of State and independent examination
- Stage 7 Publish final report; and
- Stage 8 Monitor and report progress of action plan.

Publication of this report is at Stage 3 of the above process.

The EqIA analysis will focus on the impact of the Local Plan for the current and future population of the Legacy Corporation area. The EqIA action plan includes clear mechanisms for monitoring and review. The document will be owned, actions taken and reported on by LLDC.

1.2 Consultation

In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), LLDC as a Local Planning Authority is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. The SCI sets out how and when the Legacy Corporation will involve the community and key stakeholders in the preparation of local planning policy documents and in the processing and determination of planning applications.

The SCI requires a range of community and stakeholder engagement including:

- Correspondence by email, letter and e-newsletter;
- Leaflets, posters and public displays in key locations;
- One-to-one meetings with key stakeholders;
- Meetings with residents and other interested parties;
- Focus groups and workshops;
- Public meetings; and
- Provision of a contact number and dedicated email address.

Consultation and stakeholder engagement are fundamental to the EqIA process. This reflects the idea that the development of policies and plans is better understood and received where there has been an open and inclusive process that uses information which has been subject to community and stakeholder involvement from the start of the process.

1.3 Local Plan

The Local Plan is a spatial strategy that will set out planning policies to guide development within the Legacy Corporation administrative boundary. The document will give clarity to developers, public sector bodies, the local community and other interested parties regarding policies and will enable the effective determination of planning applications.

The overall purpose of the Local Plan is to respond to the needs of existing and future communities and provide a basis for the regeneration of the Legacy Corporation area to achieve socio-economic convergence with the rest of London over the period to 2030. The Local Plan will address national and London planning policy as well as the growth boroughs' Development Frameworks.

1.4 Integrated Approach

The integrated approach for the Local Plan, Consultation and the EqIA are:

Local Plan Stages	Consultation	Equality Impact Assessment
Stage 1. Regulation 18: Preparation of the Local Plan Consultation Document	Early Engagement Formal Consultation Stages	Stage 1 – 2: Preparation of Draft EqIA
Stage 2. Regulation 19: Publication of the Draft Local Plan	Further consultation	Stages 3-5: Draft Equality Impact Assessment published for consultation
Stage 3. Regulation 22: Submission of Local Plan to the Secretary of State	Supporting Documentation: Statement of Community Involvement (SCI)	Stage 6: Supporting Documentation: Equality Impact Assessment and Action Plan reviewed
Stage 4. Regulation 24: Independent Examination	Statement of Community Involvement (SCI) Reviewed	
Stage 5. Regulation 25: Publication of Inspector's Report		
Stage 6. Regulation 26: Adoption of the Local Plan	On-going review, monitoring and delivery of SCI	Stage 7-8: Action Plan implemented and reviewed as part of Local Plan review and reporting

1.5 Key Issues

The Local Plan addresses many concerns raised during engagement and consultation with equality target groups since 2008. The success of the plan to address recognised inequalities however is dependent on a number of factors some of which are outside the control of LLDC. Working with developers, businesses, employers, educational establishments, and legacy operators to provide opportunities to local people will be a fundamental requirement for the success of the Local Plan for equality groups.

The three areas that will require on-going monitoring to ensure the vision and objectives set out in the plan are delivered are:

- Working with stakeholders and partners to deliver the convergence aims;
- Education and employment up-skilling of local people reduce the gaps between the area and the rest of London; and
- On-going engagement and consultation to find solutions to deliver the Faith and cultural requirements for the area.

Continued engagement and consultation will ensure that the risk of any inequalities are dealt with at the first opportunity and the Local Plan will then be seen as a really positive development by all equality target groups.

2 Introduction

In 2012, the Mayor of London established the London Legacy Development Corporation. The purpose of the Legacy Corporation is “To promote and deliver physical, social, economic and environmental regeneration of the Olympic Park and its surrounding area, in particular by maximising the legacy of the 2012 Olympic and Paralympic Games, by securing high-quality sustainable development and investment, ensuring the long-term success of the facilities and assets within its direct control and supporting and promoting the aim of convergence”.

As the Local Planning Authority for its area, the Legacy Corporation is required to prepare a Local Plan. The Local Plan sets out the Legacy Corporation’s strategy for the sustainable development of its area as a whole, including the general amount, type and location of new development it considers could take place and the policies that applications for planning permission should conform to in order to meet these objectives.

The Local Plan is a spatial strategy that will set out planning policies to guide development within the Legacy Corporation administrative boundary. The document will give clarity to developers, public sector bodies, the local community and other interested parties regarding policies and will enable the effective determination of planning applications.

The overall purpose of the Local Plan is to respond to the needs of existing and future communities and provide a basis for the regeneration of the Legacy Corporation area help to achieve socio-economic convergence with the rest of London over the period to 2030.

The Local Plan incorporates past spatial strategy planning and delivery including the site preparation for the Olympic Park, Legacy Masterplan Framework, and Company’s Legacy Communities Scheme (LCS). In addition the Local Plan will deliver elements of the growth boroughs Local Development Frameworks. All of these plans and frameworks were designed to deliver regeneration of the Lower Lee Valley, to improve the life, employment and business opportunities of the local population and to provide opportunities for growth.

The Olympic Delivery Authority (ODA), London Development Agency, Greater London Authority, London, Legacy Corporation, and the Growth Boroughs, have always been aware and taken into account, the impact the regeneration would have on people from all equality groups. These statutory partners have worked together to ensure the needs of the population are reflected and addressed in the development and delivery of programmes and projects.

3 Equality Information

In order to understand the impact of the Local Plan it is important to recognise the demographic of the area. The LLDC LCS provides details of the equality groups in the growth boroughs:

- 52% were women, and 48% were men;
- 49.2% were from Black, Asian and Minority Ethnic Communities;
- 21% had a Limiting, Long Term illness (a proxy for disability);
- 50% were Christian, 19% were Muslim, 3% were Hindu and between 1-2% are Jewish, Sikh and Buddhist, respectively;
- 38.8% were under 25, and 21.5% over 50; and
- 5-7% may be Lesbian, Gay or Bisexual.

There are a number of recognised inequalities for the area which the Local Plan should help to redress:

- London's Bangladeshi and Pakistani communities are particularly concentrated within the area, making up a significant proportion of the population, particularly in Tower Hamlets. Although the Bangladeshi and Pakistani populations make a strong contribution to the sub region, these communities also tend to be over-represented among those who are workless, lower paid, unemployed and concentrated in sub-standard housing.
- The GLA Child Poverty in London: Income and Labour Market Indicators, 2006 showed that 69% of London's Pakistani and Bangladeshi children, and 51% of London's Black children were living in poverty.
- There is also an over-representation of disabled people (using proxy indicators) in the five host boroughs, with figures standing at 21% of the population compared to 17% in London. Disabled people are less likely to have formal qualifications, and have lower employment rates than the average. The 2006 Annual Population Survey shows that 27% of Disabled people in London have no qualifications at all compared with 37% of non-disabled people.
- While there is an equivalent ratio of women to men in the growth boroughs, the gender pay gap for women in London is still 23%, six percentage points higher than the national average of 17%.
- Equality and Human Rights Commission Triennial Review, 2010, found that Muslim people in England have the lowest rate of employment of any religious group. Only 47% of Muslim men and 24% of Muslim women are employed and figures suggest that 42% of young Muslim people are not in employment, education or training. This has particular relevance to the growth boroughs because of the high representation of the Muslim community in the area.

The available literature and evidence, such as GLA, State of Equality in London, 2008 shows quite clearly that some groups of people have disproportionate structural, persistent, and specific barriers to employment, skills development, safe and appropriate housing, good health and participation in sport, than others. For the Local Plan to become sustainable and successful in, supporting the economic development of the growth boroughs, it must offer opportunities and benefits to people of all backgrounds and mixed incomes.

4 Consultation

On-going consultation and engagement has provided statutory partners with clear evidence of what needs to be done to address inequalities experienced by the local population. Consultation has taken many forms including:

- 1-2-1 meetings;
- Community meetings;
- Business seminars;
- Newsletters, consultation documents and online information;
- Open residents meetings across all boroughs;
- Phone polls;
- Stakeholder consultation;
- Specialist panels;
- Targeted equality group engagement;
- Youth, school and college engagement;
- Workshops and focus groups;

Since 2008 the reoccurring issues raised through engagement and consultation are in regard to:

- Improved access to educational opportunities;
- Business opportunities;
- Cultural and faith requirements;
- Employment and skills training;
- Equal access and inclusive design;
- Housing;
- Open space, play and sports facilities; and
- Safety and security.

All the statutory partners have engaged with target groups, stakeholders, businesses and the general population to develop and deliver on-going strategies to tackle inequalities.

In accordance with Section 18 of the Planning and Compulsory Act 2004 (as amended), LLDC as a Local Planning Authority is required to prepare the Statement of Community Involvement (SCI). The SCI was prepared, consulted upon and formally adopted on the 25th of March 2013. The SCI sets out how and when the Legacy Corporation will involve the community and key stakeholders in the preparation of local planning policy documents and in the processing and determination of planning applications.

The SCI requires a range of community and stakeholder engagement including:

- Correspondence by email, letter and e-newsletter;
- Leaflets, posters and public displays in key locations;
- One-to-one meetings with key stakeholders;
- Meetings with residents and other interested parties;
- Focus groups and workshops;
- Public meetings; and
- Provision of a contact number and dedicated email address.

The Legacy Corporation Community and Engagement Team will carry out equality stakeholder engagement as part of the Local Plan Consultation. The engagement will utilise and build upon the Team's knowledge and contacts developed over the years to ensure that this major strategic plan delivers opportunities for all.

To date LLDC have carried out a number of informative meetings with stakeholders and the public. This process has provided further insight into the equality issues that the Local Plan needs to address. The EqIA includes these issues for assessment alongside the other equality impacts

identified through previous consultation. The EqIA Action Plan includes advisory work which should continue to be undertaken by LLDC to ensure they are engaging with stakeholders and businesses from all equality groups.

5 Assessment of Impact

5.1 Local Plan Consultation Document

The EqIA will assess how LLDC has addressed the equality issues raised through engagement and consultation with equality groups, stakeholders, and businesses. The assessment provides insight into how the Local Plan Consultation Document (LPCD) is addressing equality impacts in relation to the:

- reduction of socio-economic discrimination and exclusion associated with equality groups;
- promotion of the needs of identified equality groups; and
- provision of benefits for identified equality groups.

The EqIA of the LPCD will focus on the plan's ability to address the needs of the following equality groups:

- **Age** where this is referred to, it refers to a person of a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).
- **Disability** a person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.
- **Gender reassignment** the process of transitioning from one gender role and status to another.
- **Race** refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.
- **Religion and belief** religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect a person's life choices or the way they live for it to be included in the definition.
- **Sex** male or female.
- **Sexual orientation** whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

In addition the assessment will also seek to address discrimination, disadvantage and social exclusion faced by other groups due to class or income, in line with the Mayors 'Equal Life Chances for All' equalities framework.

The Mayor of London has set out a series of actions which need to be incorporated into local planning to address issues of convergence, these include:

- creating a coherent and high quality city within a world city region;
- improving educational attainment, skills and raising aspirations;
- reducing worklessness, benefit dependency and child poverty;
- homes for all;
- enhancing health and wellbeing;
- reducing serious crime rates and anti-social behaviour; and
- maximising sports legacy and increasing participation.

The LPCD will also be assessed to see how it is delivering the Mayor's convergence aims for people in the Legacy Corporation Area.

The extent to which these points have been addressed will provide the basis to determine the positive or negative impact on target equality groups and therefore the areas which need to be addressed through an Action Plan.

Spatial Portrait of the Legacy Corporation Area

Spatial Portrait of the Legacy Corporation Area section provides comprehensive background into the historical and future opportunities of the area. The section provides details of the four sub areas which make up the Legacy Corporation Area:

- Sub Area 1 – Hackney Wick and Fish Island;
- Sub Area 2 – North Stratford and Eton Manor;
- Sub Area 3 - Central and South Stratford, and Queen Elizabeth Park South; and
- Sub Area 4 – Bromley-by-Bow, Three Mills and Pudding Mill.

The data included in the Spatial Portrait only relates to a single equality group; age. The information shows that the four Growth Boroughs have a mean average age of 29 to 36 yrs. The two largest estimated population groups outside of the mean average are 36-41 and 0-5yr olds. This shows that the Local Plan needs to address the needs of children, and young adults more than any other age group whilst making sure that people outside these groups are not disadvantaged.

Economic Activity and Health

Economic activity and health data are also areas covered by this section. There are challenges with regard to the impact on the socio-economic and health needs of people from different equality groups which need to be addressed. This section highlights the following issues which have traditionally been associated with people from a number of equality groups:

- The following has been drawn from the 2011 Census data for each of the Wards, and in some cases for the four boroughs as a whole, in order to provide a broad picture of the socio – economic setting within which the Legacy Corporation area sits. It provides a mixed picture, with many indicators reinforcing the perception that a significant element of the population have greater difficulty obtaining employment, achieving basic qualifications, and suffer from poor health outcomes.
- Table 1.5 provides information on occupation and unemployment levels for the LLDC wards and LLDC area, demonstrating that these wards have lower levels of economic activity than London as a whole and have higher levels of unemployment than the relevant borough and London as a whole.
- Educational attainment. Table 1.6 identifies the levels of qualification held by residents within the Legacy Corporation area wards are similar to, or in some cases above, the London-wide level for the highest levels of qualifications. However, the number of those within these wards and the boroughs who have no qualifications, is greater than that for London as a whole.
- The 2011 Census data (Table 1.7) shows that while the number of people in these wards and the boroughs as a whole who consider themselves to be in good health and not limited in their day to day activities is similar to London as a whole, significantly more consider that their day to day activities are limited a lot or that they suffer from bad or very bad health.

Assessment of impact

It is generally recognised that in order to address the needs of people from different equality groups the policies should include details of the population across all equality groups.

Positive impacts: the Spatial Portrait does provide clear evidence of the age, economic, health and wellbeing of the residents of the growth Boroughs. This demonstrates an understanding of the need to address the inequalities for these areas.

Negative impacts: Both the Interim Consultation Report and the LPCD lack any evidence of demographic and equality data. Therefore, although inequalities may be addressed through later sections, the LPCD does not include a headline summary of equality data to an extent that would provide reassurance that the needs of the equality groups and others are being addressed from a clear evidence base.

Chapters 2 and 3 of the LPCD set out the vision, objectives and strategic policies for delivery:

- Chapter 2 Vision and Objectives: Sets out the direction and approach to development and regeneration of the Legacy Corporation area and provides a framework from which the planning policies, site allocations and delivery actions have been derived.
- Chapter 3 Policies: Sets out the policies needed to implement the vision.

Business Employment and Economy

Impacts identified through engagement and consultation

Business growth

- opportunities for small and traditional businesses;
- protection and support for existing local enterprises;
- support businesses that attract middle and high earners to live and work; and
- prevent monopolies.

Jobs

- promote opportunities for employment and training which support access to new local jobs;
- designate, consolidate and intensify sites for employment generation;
- protect existing industrial and employment capacity;
- create affordable employment space for local population; and
- support higher value employment uses in emerging growth sectors.

Education

- prepare for quality and timely delivery of education facilities;
- enable some flexibility on the use of sites to provide for future needs;
- provide education to deliver expansion and diversification of economy; and
- support community libraries, heritage centres and information points.

Local Plan Consultation Document

The Legacy Corporation will seek to promote the opportunities within its area to build a strong and diverse economy and a range of high quality employment opportunities that will be accessible to those who live within its area and the surrounding areas of the Growth Boroughs. It will do this through:

- The designation and promotion of retail, commercial and industrial employment hubs, protecting the function of those hubs;
- Promoting growth in key employment and business sectors within the area and seeking to secure the necessary supporting infrastructure;
- Promoting provision of a range of sizes and types of employment and business floor space within major development proposals;
- Promoting the development of cultural and leisure attractors and activity within the area, including maximising the use of the Queen Elizabeth Olympic Park and transformed Olympic venues as an international and more local visitor attraction;
- Promoting opportunities for development of social enterprise and cultural and creative industries as a part of the overall local business and employment mix;

- Maximising the opportunities for business provided by the area's communication and transport infrastructure, promoting provision of international rail services for Stratford and, in the long term, the provision of a High Speed 1 to High Speed 2 rail link, in order to maximise opportunities for national and international business links;
- Promoting access to skills and employment training to increase opportunities for Growth Borough residents; and
- Promoting access to high quality education by supporting the development of new and existing schools and provision of higher education facilities, including those for postgraduate study and research.

Growth Borough Plans

All the Growth Borough Local Development Frameworks (LDF) include the need to develop competitive, affordable business destinations by attracting and retaining a distinctive mix of enterprises. In addition they also refer to the need to address the skills and educational gaps by developing lifelong learning initiatives.

Newham: Town centre proposals are designed to be inclusive and to act as a focal point for the whole community. The town centre offer caters specifically for local needs by encouraging small, independent shops, including budget shopping and a destination market that reflects the cultural diversity of Stratford.

Newham: Proposals to offer a broad range of employment opportunities has the potential to benefit all residents, however little information is available at this stage about the types of jobs that will be available, or the employment needs of different groups.

Waltham Forest: Focussing regeneration activities in the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street for which Area Action Plans are to be prepared. Steering additional growth in retail, leisure, small office, community and cultural facilities in the designated town centres and maximising residential opportunities, protecting local areas from inappropriate developments, protecting employment land in the designated Strategic Industrial Locations (SIL) and other Borough Employment Areas.

Assessment of impact

The LPCD addresses the concerns raised through the engagement and consultation, and also provides evidence that the needs of a number of equality groups has been taken into account.

Positive impacts: The LPCD delivers many positive impacts including but not limited to:

- Providing business opportunities, managed and affordable workspace in deprived areas will increase the opportunities for BAME, women and LGB&T SME-run businesses;
- Skills training and facilities should help to deliver employment thereby reducing the high workless rates for the area which particularly affects young men, people over 50 and disabled people;
- Maintaining and improving local facilities provides for the needs of people who have limited mobility or access to private transport;
- Promoting the development of cultural and leisure attractors will help to develop community cohesion;
- New developments alongside existing will help to balance the historic and new business elements in the area;
- Good transport links to retail and commercial centres to enable everyone to access the centres; and
- Increasing the number and level of education establishments from primary to higher education will deliver the convergence aims. This will also ensure the correct level of infrastructure is in place to support growth both in population and skill requirements for business.

Negative impacts: The GLA Convergence indicators for the area show that there are a higher proportion of low to medium skilled workers in the area. The gaps between employment rates for a number of equality groups including BAME men, young white men, women, in the growth boroughs compared to London is widening.

The LPCD does recognise that there could be issues for people with low or medium skill levels. Therefore there is a risk of a negative impact for people from equality groups who do not have the required skills to apply for jobs. This could mean that employment opportunities may be more suitable to non-residents; possibly to the detriment of local people seeking employment opportunities.

Housing, Historic and Built Environment, and Infrastructure

Impacts identified through engagement and consultation

Housing

- provide affordable, low rise family housing with gardens
- large family homes across a range of affordability;
- developments to include wheelchair accessible homes and a range of sheltered accommodation;
- ensure higher quality housing than current development of flats;
- protect the Carpenters Estate; and
- support developments that enable people to live and work in one place.

Urban design and design quality

- stipulate high design standards and ensure LLDC Inclusive Design Standards are met throughout all developments;
- promote traffic-free space;
- ensure sensitive integration of new developments with existing environment;
- create inclusive and welcoming environments for different equality groups;
- understand and design out negative impacts of evening economies;
- restrict building heights;
- be mindful of impact of phasing on social infrastructure; and
- improve streetscape, create clean, safe, accessible and appealing public space.

Area character and the historic environment

- maintain existing character;
- protect creative and diverse communities and the spaces they inhabit;
- conserve and preserve heritage; and
- prioritise creative re-use of buildings over demolition.

Community

- provide affordable facilities, shops and restaurants;
- meet the cultural requirements of different communities;
- provide space for the development of multi-faith provision;
- maintain and prioritise existing community and prevent polarisation;
- provide suitable Gypsy / Traveller sites;
- create opportunities for community management and creative contribution; and
- develop social infrastructure which provides for the needs of the whole community through co-location of services, accessible flexible and open community space.

Carpenters Road representations

- existing Housing Crisis in Newham;
- “Betrayal” by Newham Council;
- quality community life in the Estate that should be protected;
- quality housing in the Estate that should be retained; and
- if demolition occurs, residents should be relocated together, to low-rise, affordable housing with gardens.

Local Plan Consultation Document

Housing

- The Legacy Corporation will seek to ensure high quality homes are built within the area which provide real choice for all Londoners. The new homes should meet the local housing requirements of the area and strategic housing requirements of London taking account of local as well as strategic housing market assessments, in particular the need for affordable family housing. Housing delivery is a priority and the Legacy Corporation will seek to achieve the maximum intensity of use compatible with the local context and character, in line with Policy 3.4 of the 2011 London Plan.

Historic and built environment

- The Legacy Corporation will seek to ensure that the built environment within its area is well designed; creates high quality places and supports development that contributes to making places better for people. This includes the design of individual buildings, public/private spaces, as well as larger development projects which are new or subject to refurbishment or change.
- The Legacy Corporation will seek to ensure that the historic built environment within its area is conserved and enhanced through a positive strategy that promotes the wider social, cultural and economic benefits that conservation of the historic environment can bring. This should sustain and promote the significance of Designated Heritage Assets (Conservation Areas and Listed Buildings) and other non-designated heritage assets through encouraging viable uses consistent with their conservation and potential for heritage-led regeneration.

Infrastructure

- The Legacy Corporation will work with its partners to seek to deliver the infrastructure necessary to support the growth and development identified within this Plan and the contribution that this growth can make to achieving the objectives of the Convergence agenda. In doing so it will produce an Infrastructure Delivery Plan that will be reviewed and, where necessary updated, annually in consultation with infrastructure providers and stakeholders.
- The Legacy Corporation will prepare a Community Infrastructure Levy (CIL), which once implemented, will provide monies to apply to the delivery of the infrastructure included within its CIL Regulation 123 list. Where appropriate, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations through S106 Legal Agreements, A supplementary Planning Document will be produced to provide guidance on the operation and application of the Community Infrastructure Levy and S106 Legal Agreements.

Delivery of the London Plan

- As with all London boroughs, the Legacy Corporation is directed by the London Plan on a range of housing policies, including strategic housing targets, density and space standards. All of which form part of the Legacy Corporation Local Plan. The National Planning Policy Framework and the governments housing welfare reforms have particular implications for how housing needs are planned for and met in the Legacy Corporation area and across the capital.

Growth Borough Plans

Newham: Carpenters Road: The provision of family housing addresses a local need, and larger homes will be of particular benefit to Hindu, Sikh and Muslim households. Homes will be designed to be tenure blind and will provide a range of tenancy options and will therefore be accessible to those on lower incomes, such as young people and black residents. The proposals involve phased demolition of existing homes, which could be more disruptive to older households given their higher satisfaction with their homes. Improved pedestrian connections to the town centre, Olympic Park and Stratford Station and provision of local services will benefit those with mobility issues. Homes should be built to lifetime homes standards to ensure that housing meets the needs stemming from the projected increase in older people.

Waltham Forest: To ensure adequate provision of social infrastructure across the life of the plan for the following facilities: educational facilities including early years education, primary education, secondary education, further education, adult learning; Health services including primary health and secondary health; Sports and Leisure facilities including swimming pools, sports halls and outdoor sports spaces; Libraries; Community Space and Faith Facilities; Meeting rooms and halls; Emergency Services; and Pubs.

Hackney: Hackney is one of the most health-deprived boroughs in the country. The majority of the borough falls within the top 30 - 40% of health-deprived areas in England and rates poorly on most health indicators. The Core Strategy will ensure the Council and Hackney PCT work together to raise the quality of healthcare and health for Hackney's residents.

Tower Hamlets: The policies provide planning guidance for how Tower Hamlets can meet the housing needs of the borough, both affordable and market. These policies are designed to facilitate sustainable development of housing and have positive impacts for the borough's residents, especially those with more limited economic means. The Council acknowledges that affordable housing tenants have less choice over where they live and for this reason standards are proposed regarding layout of family housing.

Neighbourhood wellbeing and community cohesion should also be maintained by ensuring that new developments do not segregate market and affordable housing, allow gated communities, or contribute towards concentrations of affordable housing which is developed off-site.

Specialist housing is protected and development of new specialist housing will be supported where there is a demonstrated need. Specialist housing often accommodates people who would fit an equality strand and this policy effectively protects residents with specialist housing needs. The Council's policy on student housing is to manage student housing more restrictively. This could have negative impacts on students who often tend to have lower incomes and require specialist student accommodation. This policy approach has been taken because there is a risk that without careful management of student housing, achieving strategic objectives, such as provision of affordable homes, may be restricted.

Assessment of impact

The LPCD sets out the context for creating neighbourhoods, this includes the following information.

Helping to meet London's need for new homes through the creation of a network of new neighbourhoods which are designed to meet the needs of existing and future communities at all stages of life. Providing access to employment opportunities, local shops, and community, cultural and social infrastructure, is a priority for the Legacy Corporation.

A combination of a growing demand for new homes and an increasingly buoyant housing market in London has made much of the capital unaffordable to those on low incomes. Demand for affordable housing is high and it is the role of the Legacy Corporation to ensure mixed and

balanced communities are achieved by providing a range of accommodation that allows a choice of housing tenures and types of accommodation, and at a price that residents can afford.

LLDC have made a clear commitment to continue the inclusive design standards set on the Olympic park through to the Local Plan: 'The Legacy Corporation is committed to carrying forward the significant accessibility and inclusive design work that was undertaken in delivering the Olympic Park and its surrounding infrastructure. It is the Legacy Corporation's aim that development within its area creates wholly inclusive neighbourhoods that can be enjoyed by everyone regardless of disability, age, gender, sexual orientation, race or faith. In order to achieve this, the Legacy Corporation has developed its own standards that set the benchmark for Inclusive Design. Although these standards may not be applicable in all circumstances, the Corporation will nevertheless expect applicants to take them into consideration when formulating their proposals'.

The LPCD provides a clear overview of how issues from and consultation have been addressed. LLDC requires that all developments meet the minimum space requirements set out in the 2011 London Plan. However it should be noted that in other aspects of design the LLDC is exceeding or setting new standards that should be applied to housing as well.

In relation to Carpenters District the LPCD states: 'The core Carpenters Estate area provides the most significant opportunity for change and regeneration. A range of options are possible here including comprehensive redevelopment. However, no specific options have been developed at this stage. A flexible approach is therefore required within this Plan to allow the development of appropriate options'.

Therefore it is not possible at this time to assess the equality impacts of the Carpenters Road Estate. However the Action Plan does include work which will need to be undertaken to ensure the views of the residents are incorporated in the final Local Plan.

LLDC's commitment to meet the challenge to 'ensure that future developments within its area continue to respond to the historic elements that remain, and draw upon the landscape features that have defined this area for so many years' addresses the concerns raised in the interim consultation.

LLDC has committed to encourage the provision of new community infrastructure as part of new large scale development. Where it is proposed to redevelop a site containing an existing community facility, falling within Use Class D1, this facility should be replaced within or close to the proposed site, in a form and size that, as a minimum, allows the existing community uses to continue. This will help protect facilities for a number of equality groups including young and older people, disabled people and people from different faiths and cultures. However it should be noted that the provision to protect a community facility does not extend to protection for a service.

The LLDC sets out how the LPCD will maintain and prioritise the existing community and prevent polarisation through connectivity routes by ensuring that the layout of new and existing places connects with the existing route network, and in a way that facilitates movement along direct, permeable, safe and legible pedestrian and cycle routes. Routes will cater to the requirements of all users equally. Opportunities to connect areas to strategic road, rail and bus networks will be promoted where appropriate.

LLDC commitment to the health and wellbeing of residents in the Legacy Corporation Area more than meets the concerns raised in the interim consultation for all equality groups.

Positive impacts: The underlying principle of the housing aspect of the LPCD is to maximise the opportunities for delivering high quality, accessible and sustainable homes, including new affordable family homes.

Providing clear guidance that developments will be expected to deliver against the LLDC Inclusive Design Standards will continue to ensure that the equality needs of a number of target groups are met.

The inclusion of family homes of 3 or more bedrooms will help to meet the housing needs of large BAME families.

The requirement that there is not a net loss of residential units including affordable housing will help to meet the housing demand for low income families.

The housing needs of wheelchair users will be addressed through Lifetime Homes and wheelchair accessible units. Requiring the provision of play space and additional outdoor amenity space addresses the concerns raised in the interim consultation. This space will benefit all equality groups and will also help to the address issues associated with people's health and wellbeing.

Requiring developments to include safe and secure environments, reducing the opportunities for crime, and minimising the fear of crime, will have a positive impact across all equality groups but particularly, young and older people, disabled people, LGB &T people and BAME people.

The 35% target benchmark of affordable housing will ensure that low income families and individuals across the equality target groups are able to remain in the area.

Specialist housing will address the needs of young people, older people who require sheltered or supported housing, protection of hostel, staff and shared housing stock will also benefit people from all groups including homeless people. Working with the growth Boroughs to ensure good quality, accessible sites for Gypsies and Travellers recognises the heritage of the community in the area.

Protecting designated views and ensuring that new developments make a positive contribution will help to sustain community cohesion and a sense of place for existing residents across all equality groups.

LLDC is committed to 'Locally list those heritage assets that have a degree of significance which merits consideration in planning decisions. Assessing the significance of heritage assets will be based around an understanding of an assets age, rarity, historic association and value - either evidential, aesthetic, group, social or communal'. This should provide people with a degree of comfort that they can seek to have buildings with a social or cultural significance considered for local listing and therefore protection.

Negative impacts: It is not clear from the LPCD to what extent developers will be expected to deliver homes which take into account the faith and cultural requirements of residents as set out in the LLDC Inclusive Design Standards.

The Local Plan Consultation Document makes no reference to the provision of places for worship. Failing to acknowledge the faith needs of the community could negatively impact faith/religious groups.

Natural Environment

Impacts identified through engagement and consultation

Health and wellbeing

- support developments that facilitate positive social interaction for individuals and families;
- all developments to meet the LLDC Inclusive Design Standards to help incentivise people from different equality groups to visit and use the Parklands;
- free open play and activity space and facilities throughout developments;
- play space close to housing developments;

- community use and access to legacy sports venues;
- space for developments to provide activities by the older population;
- provide quality infrastructure and facilities that improve physical health; and
- create public safety improvements.

Open Space and Biodiversity

- well maintained spaces to reduce crime and help create and maintain safe environments;
- protect and enhance open space and biodiversity;
- adhere to 'Blue Ribbon' network policies;
- flood management and "sequential approach" testing; and
- protect yard spaces and canals for traditional ways of life.

Climate Change and Energy

- mitigate climate change and reduce CO² emissions;
- consider sustainable land use options and local energy sourcing; and
- employ high environmental standards.

Local Plan Consultation Document

Health and Wellbeing

- LLDC will seek to secure a high quality built and natural environment that promotes physical and mental wellbeing for those who live and work within the Legacy Corporation area and that helps to achieve health outcomes and a general quality of life that is equivalent to at least the average for Greater London, including seeking to secure the provision of health care space sufficient to meet the needs of the Legacy Corporation area and contribute towards meeting the wider healthcare needs of surrounding communities, while encouraging use of the sporting, recreational and cultural facilities that form part of the legacy from the 2012 Games .
- By creating inclusive places, the LLDC seeks to secure through inclusive design, places and buildings that can be easily used and enjoyed by everyone when they choose, confidently, independently and with dignity.
- LLDC sustainability objectives will draw together and balance the strands of economic, environmental and social sustainability in delivering growth and regeneration within the Legacy Corporation area, to maximise the life chances of its residents in the existing and new communities and minimises the opportunity for negative environmental and social effects.

The Natural Environment

- LLDC will work with its partners and seek to ensure that the natural environment within the Legacy Corporation area is protected and enhanced so that growth takes place within the context of a high quality environment, contributing to positive outcomes for health and wellbeing, while achieving an effective series of Green Grid and Blue Ribbon networks within and through the Legacy Corporation area and within the wider context of the Lea Valley and East London.

Growth Borough plans

Waltham Forest: Reducing the proliferation of any use which is seen to reduce people's ability to be healthy such as Hot Food takeaways and betting shops, providing convenient pedestrian and cycle access to the Olympic Park and its Legacy and associated sports facilities throughout the Lea Valley. Providing high quality Leisure Centres in accessible locations; ensuring easy and local access to clinical health services in the borough. Promoting higher levels of everyday exercise from walking and cycling through a more attractive and safer public realm. Protecting people from unsafe, unhealthy and polluting influences, and promoting a high quality living environment.

Newham: Forefront of environmental technology making the area a cleaner, greener and more pleasant to live.

Hackney: to enhance the quality of existing open space to provide equal opportunities for all residents in Hackney to enjoy a safer, cleaner and greener place.

Assessment of impacts

The work already carried out across the Lee Valley and the Queen Elizabeth Olympic Park has improved the areas that people work, live and play. The protection of open parks, parkland and play space will ensure that future generations continue to reap the health and wellbeing benefits of the Local Plan.

Positive impacts: The delivery of the health and wellbeing commitment objectives will mean that the area population life expectancy and quality of life will be much improved for all, but particularly children, older people, disabled people and BAME people who are more at risk of diabetes and heart problems, and which have higher instances of mental health issues.

Free and easy access to increased outdoor activity space will also help to balance the health and wellbeing inequalities for a number of equality groups, those on low incomes and people who prefer not to take part in organised and structured activity for cultural or other reasons. LLDC are also working with the Legacy Sports Operators to ensure access to the facilities at affordable prices.

By employing the principles of Secure by Design and the LLDC Inclusive Design Standards the Parklands, venues and facilities will provide optimum access for all. However there will need to be a well monitored maintenance programme in place to ensure the area continues to be a safe, secure and accessible environment.

Negative impacts: On-going construction work will have an impact on people living and working in the area for a number of years. The re-opening of the Queen Elizabeth Olympic Park in 2014 will help to mitigate the impact of the on-going works.

Transport and Connectivity

Impacts identified through engagement and consultation

Transport and connectivity

- improved strategic and local connections;
- provision for sustainable transport modes;
- exemplar standards for cycle routes and storage; and
- safe access.

Health and wellbeing

- improve walkways and cycle paths to incentivise physical activity.

Climate Change and Energy

- reduce the need for travel and car use; and
- support the principle of 'walkable' neighbourhoods.

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● Transport and Connectivity

Seek to maximise growth within the boundaries of existing transport (including highway, rail and waterway) capacity and that of committed projects to improve that capacity, while maximising the

opportunities for local movement by foot and bicycle, facilitating improved local connectivity where required to achieve this.

- **Climate change and energy**

Contribute to the Mayor's target of achieving "an overall reduction in London's carbon dioxide emissions of 60% (below 1990 levels) by 2025", by improving the energy efficiency of buildings, increasing the use and availability of decentralised energy within the Legacy Corporation Area and minimising the need for vehicular travel.

- **Jobs**

Secure a significant growth in good quality jobs within the Legacy Corporation Area during the Plan period, providing a diverse range of employment opportunities that are easily accessed by those living within or in close proximity to the area.

- **Creating Neighbourhoods**

To expand existing, and create new neighbourhoods that are good places to live and work and which provide the setting for communities to grow and prosper, with good links to the amenities and facilities available in the wider area.

Growth Borough plans

Waltham Forest: Ensure Waltham Forest is a safe, vibrant and healthy place to live and work by enhancing connectivity across the borough, facilitating regeneration and growth in a sustainable manner, minimising congestion and pollution, and providing a range of attractive travel options to enable access to jobs, opportunities and facilities within the borough and beyond.

Tower Hamlets: Requiring development to integrate with the transport network protects residents from isolation, which is especially important for people with limited mobility. Reducing forms of pollution caused by transportation of freight will have a positive impact on the health of residents. Extensive parking provision undermines alternative means of transportation such as public transport, cycling and walking. Encouraging travel by public transport reduces pollution and traffic congestion on the roads. Improved cycle provision allows more mobile residents greater opportunity to use renewable, green, and relatively cheaper transportation. This will also have positive benefits for resident health.

Assessment of impacts

The LLDC is committed to increasing sustainable and access transport methods and hubs, and to improving connectivity between different types of transport. There is an acknowledgment that the historic situation of disconnected routes intersected with major roads and waterways did not provide for local connectivity or ease of movement across the Lee Valley.

LLDC will be 'seeking to secure improved strategic and local connections to support intentional and national economic growth' via train travel between airports and cities across the UK.

LLDC has committed to increasing and improving cycle parking and cycle routes, in addition to safe pedestrian routes. Pedestrian routes should be clear of obstacles and have clear designated markings to reduce conflict with cycle routes. Cycle routes, where possible, should have a physical segregation from vehicular traffic.

The engagement and consultation in the past has included comments that the Greenway should be lit for safety reasons; the LPCD makes reference to the Greenway as a walking and cycling route but does not include reference to lighting.

LLDC have acknowledged that reduced parking should not include reductions in the levels of Blue Badge parking at sites and venues.

There are a number of transport improvement projects identified which will improve transport connections across the area including:

- Upgrade of Hackney Wick Station;
- Improvements to Bromley-by-Bow Station;
- A new western entrance to Stratford Regional Station; and
- New and improved links across the A12 and River Lea and Lea Navigation.

Improved transport links across all transport modes will help people seeking employment, setting up businesses, and accessing areas for leisure activity. There needs to be joined up planning with other areas in London and surrounding Counties, to enable people to travel independently across the region. Increased accessible transport at all London mainline stations, across the underground, at airports and the new Cross Rail network will need to be in place to encourage more people to use public transport.

LLDC commitment to 'require development proposals to provide new or improved access to the waterways, improvements to towpaths and footpaths and facilitate the introduction of moorings and other waterway-related infrastructure where these do not compromise the other functions of those waterways' will also provide opportunities for people who live, work or enjoy accessing the river and canals to connect with the towns and developments.

Positive impacts: Increased and improved pedestrian routes will help to reduce isolation for disabled people, older people and people who do not have access to private transport. Improving lighting will make areas more secure and help to reduce crime and other anti-social behaviour which will have a positive impact on all equality groups. Increased access to all modes of transport and better connectivity will benefit people from all equality and disadvantaged groups.

Negative impacts: Reducing the options for private transport can have a negative impact on people's ability to access the community, for example, parents and guardians with children, older people, and people with restricted mobility.

6 Conclusion

The Local Plan addresses many concerns raised during engagement and consultation with equality target groups since 2008. The success of the plan to address recognised inequalities however is dependent on a number of factors, some of which are outside the control of LLDC. Working with developers, businesses, employers, educational establishments and legacy operators to provide opportunities to local people will be a fundamental requirement for the success of the Local Plan for equality groups.

In general, the assessment has identified minor negative impacts in the Local Plan, many of which can be mitigated or a solution found to address the impact with ease. However, it should be noted that the area's faith provision does require further investigation, engagement and consultation. This has historically been an area of differing opinions and will need all groups to be engaged in order to find a solution.

Continued engagement and consultation will ensure that the risk of any inequalities are dealt with at the first opportunity and the Local Plan will then be seen as a really positive development by all equality target groups.

7 EqIA Action Plan

The EqIA action plan sets out how LLDC can ensure that the views of target groups and hard to reach groups are incorporated into the final Local Plan. The Action Plan provides details of work which needs to be carried out to address and mitigate any negative impacts.

LLDC will be responsible for ensuring the negative impacts identified are addressed through the development of the final document and the subsequent Local Plan process.

7.1 Consultation and engagement

Area of work	Target Group	Actions	By whom and when
Database and target group identification	All	<p>Establish the demographic and equality nature of public and business population.</p> <p>Update current database to reflect type of groups to be engaged with i.e. technical, community, partner etc.</p> <p>Address any gaps in target group identification in relation to the local population.</p>	Community Engagement Team Before start of on-going consultation.

Area of work	Target Group	Actions	By whom and when
Engagement with local target groups	All but particularly Faith Groups and LGB & Groups	<p>Target engagement with Faith Groups and LGB &T groups who needs are under-represented.</p> <p>Develop and fund work with local target groups to ensure people are informed and engaged.</p> <p>Produce a summary document which can be used by local groups to engage members.</p>	Community Engagement Team
Leaflet, letter and email distribution	All but particularly people who are hard to reach because of disability, age, culture or other social factors.	<p>Work with social, community and voluntary providers to get information out to and responses from hard to reach groups.</p> <p>Use a freepost address for correspondence</p>	<p>Community engagement team</p> <p>On-going through consultation phase</p>
Contact number/ dedicated email address:	All	<p>Use both a free phone number and Lo-Call number.</p> <p>Assess the need for translation services which can be used with the phone line</p> <p>Carry out equality monitoring of respondents</p>	<p>Team responsible for phone line and email correspondence</p> <p>On-going through consultation phase</p>

Area of work	Target Group	Actions	By whom and when
<p>Meetings with residents associations/ other interest groups</p> <p>Workshops and focus groups</p> <p>Stakeholder engagement</p>	<p>All groups for whom there is no identified data or feedback</p>	<p>Work with Market Research company to target groups for consultation.</p> <p>Workshops in all geographic areas to ensure issues to each area can be addressed.</p> <p>Ensure all meetings are well published and in accessible buildings.</p> <p>Provide evidence that a mix of community and stakeholder groups were engaged.</p>	<p>Community and Stakeholder Engagement Team</p> <p>On-going through consultation phase</p>
<p>Public displays/ exhibitions</p>	<p>Older People, disabled people, people from different faiths and hard to reach groups due to likelihood of non-engagement in the past.</p>	<p>Provide displays for community leaders and stakeholder groups to use to gain feedback from members.</p> <p>Work with all faiths to provide display space in places of worship.</p> <p>Use additional media such as bill boards and bus shelters around the area, social media such as Twitter and Facebook.</p>	<p>Communications Team</p> <p>Before and on-going through consultation phase</p>
<p>Local Plan Newsletter, including Legacy Corporation E-Newsletter</p>	<p>All</p>	<p>Ensure messages are linked to other growth Borough work.</p> <p>Monitor feedback to check where responses are coming from and from which groups.</p>	<p>LLDC and Growth Borough Communications, Community Engagement Teams</p> <p>Before and on-going through consultation phase</p>

7.2 Spatial Portrait of the Legacy Corporation Area

Area of work	Target Group	Actions	By whom and when
Equality data and evidence	All	Provide headline equality data in relation to the LPCD: employment, business ownership, education attainment, income, housing and households, transport and leisure.	GLA / LLDC

7.3 Business Employment and Economy

Area of work	Target Group	Actions	By whom and when
No actions identified However on-going monitoring of planned work to ensure positive impacts are being achieved.	All	Independent review and monitoring of impact of planned projects and programmes.	LLDC Employment and Skills Team, Business Support Services, and Independent Auditor

7.4 Housing, Historic and Built Environment, and Infrastructure

Area of work	Target Group	Actions	By whom and when
Carpenters Road Estate	All	On-going consultation with the residents of the Estate, to ensure their views are incorporated into the final Local Plan.	LLDC Community Engagement and Planning Teams.
Inclusive Design experts to be engaged on all development design teams.	All	Clear statement of the requirement to consult and or engage inclusive design experts for all housing developments.	LLDC Senior Manager - Accessibility and Inclusive Design
Places of worship	Faith and religious groups	Undertake research and provide evidence of what the faith and religious requirements are for the area and how they have been addressed.	LLDC to confirm

7.5 Natural Environment

Area of work	Target Group	Actions	By whom and when
Construction work	All	Maintain current level of community engagement and mitigate noise and disruption throughout the construction phases of development.	LLDC Community Engagement Team

7.6 Transport and Connectivity

Area of work	Target Group	Actions	By whom and when
Reduced access to areas by private transport	Older people, people with restricted mobility, parents and guardians with children.	Ensure transport plans consider the needs of these groups when reducing access to areas by private transport.	Transport and Planning Teams. On-going.

8 Glossary

CIL	Community Infrastructure Levy
BEAP	Built Environment Access Panel
EqIA	Equality Impact Assessment
GLA	Greater London Authority
Growth Boroughs	Hackney, Newham, Tower Hamlets and Waltham Forest
LLDC	London Legacy Development Corporation
LPCD	Local Plan Consultation Document
LVRPA	Lee Valley Regional Park Authority
SCI	Statement of Community Involvement
TFL	Transport for London

9 Reference Documents

LLDC Interim Consultation Report 2013
September 2013

LLDC Inclusive Design Standards
March 2013

Waltham Forest Local Development Framework Core Strategy Proposed Submission Equality
Impact Assessment
January 2011

Newham Stratford Metropolitan Masterplan Supporting Document Equality Impact Assessment
February 2011

Hackney Local Development Framework Equality Impact Assessment
February 2011

Tower Hamlets Equality Analysis of the Managing Development of the Local Development
Framework
November 2011

GLA Equal Life Chances for All
July 2009

Entec Integrated Impact Assessment Full Report: Consultation draft replacement London Plan
(Spatial Development Strategy for Greater London)
October 2009