

LD11B- Summary of Representations made under Regulation 20 of the Local Planning Regulations and Legacy Corporation response

Contents

By Representor	2
By section	210
Justification for additional changes not resulting from a representation	420

By Representor

Personal reference number	Representation reference number	Change Reference Number	Section of the Revised Local Plan	(new) Paragraph and policy /other	Organisation/ Company/ Representing on behalf of	Summary	Response
PRN.001	R19.0002	C39	Section 4	Table 3, B.1b5 Wick Lane and Crown Close	Private individual	Crown Close is public highway currently being used for industrial purposes without planning consent so should ensure this is stopped with immediate effect. Warehouses next to 616 are causing nuisance and encourage crime. This makes it unsafe and is incompatible with residential properties. The land should be pre-designated to residential or mixed use as any warehouse space is inappropriate.	This does not refer to a change proposed to the Adopted Local Plan. However planning enforcement officers have been made aware of the complaint.

PRN.001	R19.0001	C39	Section 4	Table 3, B1a3 Bow Goods Yard	Private individual	Bow Goods Yard is not appropriate for waste management uses and should be removed. It should reflect the fact that SIL land can also be used for non-industrial or related uses and should be resisted other than as part of a strategically coordinated process of consolidation or where it addresses a need for accommodation for SMEs or emerging industries. This site should be used for creating new innovative technologies and not old Victorian, pollution causing industries. There is no place for concrete factories, tarmac or was management 100m from residential.	The proposed change to remove reference to waste management uses is noted. However, as this wording was included within the Adopted Local Plan it does not relate to a change as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. Bow Goods Yard is a designated SIL and in accordance with the London Plan are preferred locations for general industrial activities including waste management (see 2.17, E5)
PRN.002	R19.0003	n/a	Section 8	Policy S.1	Sport England	Sets out the role of Sport England, providing guidance and ensuring positive planning for sport. Sports England recognise that whilst there have been amendments to the Revised Local Plan since the previous iteration which highlight the importance of sporting facilities and industries in the area, comments to the previous consultation have not been addressed, and that policy S.1 fails to reference sporting facilities and that the supporting evidence around such	Policy S.1 has been the subject of minimal change to reflect changes to London policy with the Draft New London Plan's inclusion of the Healthy Street's approach. This policy is otherwise consistent with the Adopted Local Plan which was found sound at examination in 2015. Accordingly, other than the amendment to reflect London wide policy changes, this policy is still considered to be sound.

						facilities for this Local Plan Review are not thorough and therefore the Revised Local Plan is not sound.	The supporting evidence for the infrastructure elements of the Revised Local Plan is the Infrastructure Delivery Plan, which was prepared using relevant up to date borough strategies and evidence in addition to the Legacy Corporation's own Open Space and Play Space Study. This reflects both the nature of the LLDC as a development corporation (rather than a local authority) and the need to take account of evidence in relation to the wider area (due to the relatively small scale of the Legacy Corporation area and the fact that residents travel outside of the area to use the boroughs' facilities and vice versa). The approach within the policy and to the evidence used is considered to be proportionate and in accordance with the requirements of national planning policy and in general conformity with the London Plan.
PRN.003	R19.0004	n/a	The Early Engagement Consultation Report	N/A	Port of London Authority	The Port of London Authority is satisfied with the responses given to its Regulation 18 representation, as shown within the Early Engagement Consultation Report.	Comment noted.
PRN.003	R19.0005	n/a	Section 6	Policy BN.2	Port of London Authority	The Port of London Authority acknowledges that the Revised Local Plan area falls outside of the PLA's	Comment noted.

						jurisdiction, however it is satisfied that the draft Polices adequately promote use of the river for trade, travel, leisure and pleasure.	
PRN.004	R19.0006	N/A	General Comments	General	Natural England	Natural England does not consider that this revised local plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	Comment noted.
PRN.005	R19.0007	n/a	Sub Area 1	B.1b5 – Wick Lane and Crown Close, Fish Island	National Grid	Identifies National Grid's responsibilities in owning and managing the power distribution network and the need for development proposed for sites within the vicinity of these assets to take these into account. Identifies proposed sites crossed or in close proximity to National Grid infrastructure: B.1b5 – Wick Lane and Crown Close, Fish Island, designated as Other Industrial Land: Underground Cable – 265599 Underground Cable - 262270 Underground Cable - 262261 Underground Cable - 264257.	Comment noted.

PRN.005	R19.0009	n/a	Sub Area 3	SA3.6 – Rick Roberts Way	National Grid	<p>Representations on behalf of National Grid. National grid owns and operates high voltage electricity transmission and gas transmission systems. To ensure continued safe operation of existing sites and equipment and to facilitate future infrastructure investment National Grid wishes to National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. An electricity cable crosses SA3.6 Rick Roberts Way and statutory safety clearances must not be infringed. National grid's overhead power line are designed to have a minimum height above ground and where changes are proposed to ground levels then these should not be infringed. On request detailed line profile drawings can be provided giving height of conductors. National Grid Asset Guidance National Grid prefers that buildings are not built directly beneath its overhead lines due to amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service. Access can be difficult without disturbing occupiers. National Grid seeks to encourage high quality and well-planned development</p>	Noted
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					<p>in vicinity of its high voltage overhead lines and land beneath should be used to make a positive contribution of site's development such as nature conservation, open space, landscaping areas or used as a parking court.</p> <p>National Grid has produced 'A Sense of Place' guidelines which look at quality development near overhead lines and offers practical solutions which assist in avoiding unnecessary sterilisation of land. Should be aware of the National Grid policy to retain overhead lines in situ. Relocation will only be considered for projects of national importance identified as such by central government. National Grid requests that High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. They form an essential part of transmission system and approach is to retain. Deed of Easements for each asset prevent erection of permanent/temporary buildings or structures, changes to ground levels, storage of materials etc. Written permission is required for any works commencing within the easement strip and deed of consent is required for cross of the easement. Land Registry should be checked for the development area and</p>	
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						plantprotection@cadentgas.com . Happy to provide further advice and can provide informal comments during policy development and additional publications are available.	
PRN.005	R19.0008	n/a	Sub Area 4	SA4.1	National Grid	Identifies National Grids responsibilities in owning and managing the power distribution network and the need for development proposed for sites within the vicinity of these assets to take these into account. Identifies proposed sites crossed or in close proximity to National Grid infrastructure: SA4.1 Bromley-by-Bow: Underground Cable – 262273 Underground Cable - 262249	Comment noted
PRN.006	R19.0010	C181	Section 6	n/a	Historic England	Historic England welcomes the draft Revised Local Plan and considers that it offers an excellent platform to achieve a positive strategy for the historic environment through planning. They welcome the identification of the challenges and opportunities relating to the historic environment as a headline objective to the Revised Local Plan, together with the aim of ensuring growth and development complements and enhances existing local character. Historic England notes the evidence base underlying the heritage-related policies and consider these are comprehensive and proportionate.	Comments noted.

						Historic England also notes and welcome the specific detail relating to the site allocations at Three Mills Island and Sugar House Lane. Historic England considers this appropriate in relation to the conservation and enhancement of the listed buildings on these sites as well as the conservation areas.	
PRN.007	R19.0011		Section 5	Policy H.2	Councillor, Hackney Wick Ward	Should include a commitment to seek tenure blind allocation of units (aka pepper-potting). Evidenced advantages for this include creation of mixed and plural communities. Social integration was an objective of the legacy and LLDC. Developers argue financial and administrative advantages of separating private and public housing so not feasible to achieve. This is not supported by clear evidence rather than preference from registered providers on management grounds. The fact that large-scale tenure blind developments led by developers eg at Chobham Farm shows that pepper-potting is feasible on commercial and administrative grounds. Any marginal financial gains would be out-weighted by benefits of reducing social division and discrimination that can accompany segregated developments.	The principle of mixed and inclusive communities is fundamental to the approach within both the draft New London Plan and the Revised Local Plan. Policy H.1 (3) of the Revised Local Plan sets out that all residential proposals should promote the creation of mixed and inclusive neighbourhoods which involves providing for a range of different forms of residential accommodation by size, form, tenure and typology. This is also a specific consideration when the Legacy Corporation considers the suitability of the dwelling size and mix of a proposal. Para 5.14 also states that “Where the Legacy Corporation considers that a proposal could impact negatively on mixed and inclusive neighbourhoods, or harm the residential amenity, character or function of the area, additional justification of the need for the development should be provided in

						<p>the form of local studies, waiting lists, business cases for the development and potential economic repercussions, should the proposal not take place". However the Legacy Corporation is willing to accept that the introduction of additional wording to Para 5.22 may assist in clarifying how this this principle applies specifically in relation to the design and layout of a scheme including affordable housing. Please see proposed minor modification MM21: <u>The principle of mixed and inclusive communities is essential to the design, location and layout of affordable housing across development schemes. Schemes should be designed to aid social cohesion and inclusiveness on a development and individual block scale. This will involve careful consideration of the management and location of affordable units, including how affordable units may be 'pepper-potted' or dispersed across the whole development and where feasible, shared entrances for different tenures.</u> Where affordable housing is provided as dedicated blocks within a larger scheme the affordable housing units should be appropriately located across the site,</p>
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							avoiding parts of the site which may be more constrained or less accessible. Affordable accommodation should be indistinguishable externally from other tenures. <u>Schemes should also ensure a consistency of landscape and public realm design and management across the development as a whole.</u>
PRN.008	R19.0012	n/a	Section 4	Policy B.1	LaSalle Investment Management	<p>Representations are on behalf of the Old Ford Trading Estate and Maverton Road Trading Estate. The area in which these trading estates are located is industrial although residential and conversions have been delivered adjacently in recent years. Permission was granted for flexible use of Old Ford Trading Estate within classes B1c, B2 and B8. Client's objective is to maintain high occupancy levels in short to medium term and preserve long term commercial viability. It is therefore a priority to maintain the industrial function of the premises to ensure these can continue to meet operational requirements of a broad range of industrial, storage and distribution which will not be compromised by the introduction of residential.</p> <p>Sites are within the Fish Island South SIL</p>	<p>Although it is recognised that E5 (5) of the draft New London Plan sets out that proposals within or adjacent to SILs should not compromise the integrity or effectiveness of the locations in providing industrial-type activities on a 24 hour basis, if it assists in the clarity and effectiveness of the Revised Local Plan the Legacy Corporation is willing to accept that reference to this is included in new Para 4.14. Please see proposed minor modification MM13: <u>Within or adjacent to SILs proposals should not compromise the integrity or effectiveness of the location in accommodating industrial type activities and their ability to operate on a 24-hour basis. For all clusters, where identified within Table 3, residential will be appropriate when</u></p>

					<p>and are not allocated but are in close proximity to Bow Goods Yard (SA4.5) which allows for long term residential following industrial intensification for freight use. Client supports strategic policy aspiration to protect and support B2/B8 intensification. But objects to draft wording as it is not effective or flexible to respond to transformation of the area from industrial to industrial/residential which safeguards intensification of uses within the SIL. The policy intention with respect to release on land on allocated sites for non-SIL uses is towards co-location of uses but wording should be further strengthened to ensure ongoing viability of retaining SIL uses.</p> <p>Client recognises that B.1 recognises and supports the objectives to intensify SIL for industrial uses to support and increase job creation in line with London Plan (2.17 and E5). It seeks to safeguard land within SUL for balance of B class uses but Table 3 restricts the types of uses within Fish Island SIL to B2 and B8 industrial, warehousing, transport and waste management and distribution. Where residential has been introduced it is considered that restricting the cluster to B2/B8 is unjustified and precludes alternative</p>	<p>the employment-generating potential and industrial floorspace capacity are maintained and amenity and servicing issues have been addressed.</p> <p>It is not considered necessary to include another reference to the Agent of Change Principle as this is already covered adequately but Policy BN.12.</p>
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					<p>uses within B1c or sui generis such as car or tool tire. Policy should widen the range of industrial uses acceptable in the cluster to ensure objective for SIL is met. Object to B1a2 and should include wider sui generis industrial uses.</p> <p>In relation to policy objective to facilitate intensification of industrial locations to allow for non-SIL use this should be managed by planning policy. Co-location of uses may lead to units becoming commercially and operationally unviable for B use classes. Recent permissions of Old Ford Trading Estate and Maverton Road Trading Estate imposed additional operation restrictions (delivery hours and noise levels) and is example of how residential proximity can constrain industrial premises and potential financial burden on the landowner/prospective occupiers of the existing and longstanding SIL land. Priority is maintenance of commercial viability for widest range of uses with the ability to intensify. Any future non-SIL uses including those in SA4.5 do not impact on operational capacity of premises and greater than have done. London Plan policy E5 (SIL) states that proposals within and adjacent should not compromise the integrity of</p>	
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						<p>effectiveness of these locations in accommodating industrial activity on a 24hr basis. Emerging policy E7 supports intensification in selected parts of SIL and consolidation delivery of residential and other uses (B) however it is recognised that this process must ensure that industrial activities are not compromised in terms of their continued function, access and service arrangements. 7 day/24hr access is key to the trend and demand for industrial generated by online retail market of next day delivery resulting in associated vehicle movements and distribution, non-SIL uses should not compromise this. Agent of change is further consideration in NPPF para 182 and Policy D12 of emerging London Plan. This places responsibility of mitigating impacts from existing noise and nuisance-generating activities on proposed new noise sensitive development (A). Under (D) it requires development to be designed to ensure that noise and other uses remain viable and continue to grow without unreasonable restrictions being placed on them. Responsibility for mitigation is placed on new development so where placed close to existing noise-generating uses applicants are required to design in more sensitive way to</p>	
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						<p>protect new occupiers e.g. residents, businesses, schools from noise and other impacts. B.1 is not consistent with NPPF para 182 and E5 and E7 of the London Plan and it should give greater weight to ensuring that existing employment uses are not compromised. It should recognise the Agent of Change and take account of existing noise-generating uses in a sensitive manner when new development is proposed. We object to B.1 and amendments should be made.</p> <p>It is proposed that the following wording is added to the end of criterion 3 “Notwithstanding the allocation, proposals that compromise the function, access and overall operation of existing SIL uses and land will be refused”. “Proposals should demonstrate an acceptable relationship with the existing SIL uses and ensure that established noise-generating industrial uses remain viable and can continue or grow without unreasonable restrictions being placed on them.”</p>	
PRN.008	R19.0013	C321	Sub Area 4	SA4.5 Bow Goods Yard	LaSalle Investment Management	Supports inclusion of the new site allocation SA4.5 but objects to the proposed wording and suggests the amended wording: “Demonstrates an acceptable relationship between the rail and other SIL uses both within the site	Comment noted, however it is considered that the current wording of SA4.5 provides a strong level of protection for the uses currently on site, especially when combined with the safeguarding that is in place in

						and the wider Fish Island South Employment Cluster SIL and any non-SIL uses proposed, including noise, air quality and visual impact, applying the 'Agent of Change' principle". Supporting development principles – "Ensure that any non SIL use does not compromise the function, access and overall operation of ongoing industrial uses in the vicinity."	relation to the SIL designation.
PRN.008	R19.0014	C39	Section 4	Table 3, B. 1a2	LaSalle Investment Management	<p>The character and nature of the Fish Island South SIL cluster is changing that restrictions are being placed on client's sites. Client wishes to ensure these are lettable and viable but it is becoming increasingly challenging particularly the potential for future intensification.</p> <p>Draft New London Plan introduces a new and creative approach to intensification and co-location of industrial but this approach needs to be tested in the market, i.e. not aware of any successful letting of multi-storey industrial with residential uses excluding student accommodation. B1 Table 3 B1a2 allows non SIL uses to be introduced within the cluster where non consolidated and intensive high quality industrial are provided through the development of multi-storey schemes and more efficient plot ratios. Object to the current approach to</p>	The approach of the policy has not been significantly amended and is considered to be in conformity with the London Plan which places the LLDC area in the 'retain capacity' category therefore protection of the SIL and the industrial functions contained therein is necessary.

					<p>transforming the cluster because limited consideration given to function of the area ie to safeguard and intensify B1c, B2 and B8 and how changes and proposed new allocation will impact on the remaining SIL sites and their future redevelopment. Principle of plan-making in the NPPF is to ensure plans seek opportunities to meet development needs of the area and are flexible to change. The policy framework does not take account of the changes that have already taken place and proposed in the plan which could make intensification of B1c/B2/B8 unviable or undeliverable. Policy should introduce a mechanism to review the function of the SIL and deliverability of B1c/B2/B8 to facilitate a scheme coming forward. Current approach to safeguarding and intensification is not justified and could stifle development.</p> <p>Support for strategic approach to protect and support industries of trading estates object to B.1 as not justified, effective of consistent with national policy. SA4.5 and B.1 have potential to compromise the function of the client's site in the SIL unless a policy requirement to protect the existing uses is incorporated. Blanket approach to safeguarding site by virtue of the SIL</p>	
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						designation is not justified or deliverable bearing in mind changes in area that have taken place.	
PRN.009	R19.0015	N/A	Section 7	Transport Study	Highways England	Sets out the role of Highways England as the authority responsible for the strategic road network and concerns around the impact that increased traffic in the LLDC area might have on the wider strategic road network. In the case of the area covered by the London Legacy Development Corporation, although there is no SRN in the area, it should be noted that the M11, the A13 section between the A1089 and the M25 junction 30, and the M25 junctions 29 to 30 are located to the north and east of the area respectively. The M25 Junction 30 and the M11 Junction 4 are heavily congested throughout the peak hour periods and any material increase in traffic on these sections of the SRN would be a concern to the Highways England. Outlines its request at the Regulation 18 stage to understand the residual impacts of the Revised Local Plan on its network and does not consider that this has been addressed.	<p>Comment noted. As part of the Local Plan Review process the Legacy Corporation undertook an updated Transport Study, this study used a range of information, including updated TfL modelling. The TfL modelling has been updated to reflect the changes included within the Draft New London Plan, which includes the increased housing target within the Legacy Corporation area. In addition to this the Revised Legacy Corporation Local Plan reflects the reduced car parking standards set out in the Draft New London Plan, and development within the Legacy Corporation area has already included very minimal car parking, which means that any increased pressures on the road network are minimal, and should have a minimal impact on the wider SRN.</p> <p>Information with regards to the Transport Study and its findings, including impact on the wider SRN, is further set out within the Transport Explanatory note.</p>
PRN.010	R19.0044	C109	Section 7		Mayor of Tower	Increased focus on car-free	Comment noted

		(perhaps 190?)			Hamlets	development in LLDC area is positive.	
PRN.010	R19.0048		Sub Area 4		Mayor of Tower Hamlets	Supportive of references to protection of heritage assets and development to be sensitive to these assets as well as maintaining the requirement for the open space within Bromley-by-Bow (SA4.1).	Comment noted
PRN.010	R19.0016	N/A	General Comments	General	Mayor of Tower Hamlets	Recognises that a number of the concerns we raised in our previous letter have been addressed including on waste consolidation systems, requirements for innovative housing products to deliver affordable housing and support for a modal shift in transport. However, a number of concerns regarding the consultation remain. Reiterates previous comment that it considers it more appropriate for the Legacy Corporation to be de-designated as Local Planning Authority and planning powers handed back to the boroughs. In this context is concerned about the decision to refresh the LLDC Local Plan. In the event that this review progresses it is considered that the policies in the Revised Local Plan should become more aligned with those of the four boroughs rather than adopting the approaches in the London Plan. In particular the Council has concerns about the housing mix and affordable housing approach in the	The Council's position on the future of planning powers is noted. The <u>Duty to Cooperate Background Paper</u> sets out the mechanisms for cooperation that are in place in detail. It also includes recognition that planning powers will return to the four boroughs at a future date. The LLDC Board, on which each of the boroughs is represented, has initiated discussion on the future of the LLDC. This discussion encompasses planning powers and will lead to more detailed work to set out the mechanism and timing for the return of planning powers. An initial view is that could take place by 2024/25, however the detail and programme for this remain to be discussed and agreed. Given the significant changes to national planning policy and the publication of the draft New London Plan, it is considered appropriate to review and update the Legacy

					<p>draft New London Plan. It considers that there should be a greater delivery of affordable rented than intermediate homes. Continue to express concern about the approach to waste and in particular to the changes to the Site Allocation SA1.3 Hepscoth Road considering the changes to worsen the position here with the resolution to grant permission for mixed-use redevelopment of the site. Also considers that the Revised Local Plan fails to demonstrate the ability to provide for sufficient school place capacity over the plan period and should use identify sites for provide mechanisms to safeguard school places for the plan period.</p>	<p>Corporation Local Plan at this point in time to ensure that it remains up to date during the period that the LLDC remains as the local planning authority. Moreover from 6 April 2018, under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) all local planning authorities must review their local plans at least once every five years from their adoption date.</p> <p>The review of the Adopted Local Plan has been undertaken based on relevant evidence, consultation and engagement. Further explanation is provided within the background papers and consultation report. It is anticipated that the secondary legislation necessary to return planning powers to the boroughs will set out the process for reintegration of planning policy within the LLDC area with this most likely to be through subsequent borough local plan reviews.</p> <p>With regard to the issues raised in relation to aligning policies with those of the four boroughs as opposed to the London Plan, it is noted that section 24(1)(b) of the</p>
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							<p>Planning and Compulsory Purchase Act 2004 requires the Revised Local Plan to be in general conformity with the London Plan.</p> <p>The issues raised around housing, affordable housing, waste and school place delivery are responded to elsewhere in this schedule in relation to the specific changes that are proposed to the Adopted Local Plan.</p>
PRN.010	R19.0017	C2/C3/C4	Section 2	Our Area	Mayor of Tower Hamlets	Notes the significant change in the nature of the population and economy of the LLDC area since adoption of the Adopted Local Plan. Considers that it would be beneficial for this introductory section to provide more of an analysis of why this change has occurred (for example due to the nature of the new housing stock) and a reflection on how the new Plan addresses these changes. This would help demonstrate the justification for the Revised Local Plan.	Comment noted. This section of the Revised Local Plan, as in the adopted version, is intended to act a brief overview of the LLDC area rather than an in-depth analysis. As a consequence, a greater level of detail is set out in supporting information such as the Spatial Portrait Background Paper and the Population Report: Profile and Forecasts (March 2018).
PRN.010	R19.0018	C4	Section 2	Our Area	Mayor of Tower Hamlets	The inclusion of the word tenure within 'challenges' is supported but consider this should more explicitly reference affordable housing. In addition, in light of the rapidly changing population – maintaining a mixed and balanced community should also be added to challenges. In light of LBTH's housing need, this would ensure the Revised	The change introduces the word 'tenure' to the existing bullet point sentence and is intended to embrace housing need overall, including need for affordable tenures. Reference to 'mixed and balanced communities is considered to be a policy aim rather than an additional challenge within the draft Revised Local Plan, for

						Local Plan is positively prepared to meet our objectively assessed need.	example as referred to within Policy H2 Affordable Housing.
PRN.010	R19.0022	C38	Section 4	Para 4.19	Mayor of Tower Hamlets	Modification states that when designing flexible space within mixed use schemes consideration of relationship between home-based work and dedicated workspace or potential integrated employment and leisure offers may be a factor. Council consider that the inclusion should be reviewed, and live work is not supported in Tower Hamlets given the conversions to residential It is very difficult to implement and enforce which has put pressure on employment floorspace supply in past. Instead welcome proposals that offer a range of uses as separate units within same site. Would welcome clarity that this reference is delivering two uses in one building rather than live/work.	The modification does not refer to or seek to encourage live/work accommodation. The supporting text seeks to ensure that different flexible formats of workspace and a diversity of residential offers are considered in mixed use developments.
PRN.010	R19.0023	C47	Section 4	Para 4.26	Mayor of Tower Hamlets	Support for A5 uses and proximity to schools and in principle the 400m buffer. Note that this is not applicable in Tower Hamlets given density the buffers cover most of the borough. Emerging local plan proposed 200m.	Noted
PRN.010	R19.0025	C61	Section 4	Para 4.39	Mayor of Tower Hamlets	Change welcomed and acknowledge need for partnership working amongst boroughs to facilitate training and apprenticeships.	Noted
PRN.010	R19.0020	C22 / C28 / C23	Section 4	Para 4.4, 4.5 and 4.8	Mayor of Tower Hamlets	Welcome inclusion of potential Creative Enterprise Zone at Hackney Wick and Fish Island in Local Plan.	Noted

PRN.010	R19.0029	C74	Section 5	Para 5.10	Mayor of Tower Hamlets	Welcome consideration of borough SHMAs in the Housing Requirements Study however population approach (model 4) as household projections is concerning as replicates sub-optimal housing mix and does not respond to need in wider area. Population has changed rapidly reflecting new housing but this has only achieved 22% affordable and lower amounts of family housing. This projects forward this household composition and need therefore not sound. Greater weight should be given the SHMAs and seek greater proportion of affordable housing.	The projections contained within the Population Forecasts factor in housing mix policy requirements including that of affordable housing.
PRN.010	R19.0031	C87	Section 5	Para 5.20	Mayor of Tower Hamlets	Sentence stating affordable housing allocations following borough approaches suggests the product mix can meet the borough's preferred mix. If so this is supported.	Schemes will be expected to follow the housing mix policies of the Revised Local Plan. The sentence relates to the fact that the boroughs are responsible for the affordable housing nominations process, which is clear from the beginning of the sentence.
PRN.010	R19.0032	C88	Section 5	Para 5.21	Mayor of Tower Hamlets	Support for build to rent schemes delivering same affordable housing mix however 70:30 more appropriate than 60:40. Any affordable rent units should be allocated through borough's allocation process.	Noted.
PRN.010	R19.0035	C117	Section 5	Para 5.40	Mayor of Tower Hamlets	Policy introducing the GLAs 50 bedspace threshold also has a 30 bedspace policy. Should clarify under	Paras 5.37 and 5.40 make clear when each policy will apply, making appropriate distinctions between

						<p>which when assessed under HMO policy and when under shared living. Support affordable housing but not as a financial contribution. Scale could mean different tenures on same site which would be preferable, as in Council's emerging D.H7 policy.</p>	<p>HMOs and shared living. However it is acknowledged that some additional text to Para 5.40 may assist in providing clarity. Please see proposed minor modification MM26: Large-scale shared living is defined by the draft New London Plan as schemes containing 50 or more non-self-contained bedspaces as described above, <u>however for the purposes of this policy shared living proposals of any scale are defined by the above criteria.</u></p> <p>The approach of seeking a financial contribution towards offsite affordable housing follows the draft New London Plan. This type of accommodation does not meet minimum housing space standards and generally consists of bedrooms rather than housing units, so it is not considered suitable as a form of affordable housing itself.</p>
PRN.010	R19.0037	C125	Section 5	Para 5.47	Mayor of Tower Hamlets	Size should not be included within the list of innovations in H8 (7). Undersized units cannot meet need or standards.	This policy acknowledges the new forms of housing products which are emerging and gives the Legacy Corporation the policy tools to specifically deal with such proposals. Policy BN.4 continues to apply the Nationally Described Space Standards - Technical Requirements.
PRN.010	R19.0027	C68	Section 5	Para 5.5	Mayor of Tower	Build to Rent to meet affordable	Noted.

					Hamlets	housing requirements is welcomed.	
PRN.010	R19.0038	C132	Section 5	Para 5.57	Mayor of Tower Hamlets	Supports widening definition of community facilities to include D2 usage.	Comment noted.
PRN.010	R19.0039	C134	Section 5	Para 5.61	Mayor of Tower Hamlets	The Revised Local Plan fails to demonstrate sufficient schools capacity for the plan period and has an unsound approach to planning for school places through the period and fails to safeguard school places. The Tower Hamlets local plan has taken a different approach which retains flexibility in the delivery of further school places.	Comment noted. The Revised Local Plan continues to express a strategy for schools and school place provision within the Legacy Corporation area in which new school sites are required as part of development within specific site allocations, based on identified requirements and land availability. Beyond this the strategy is for the expansion of existing school sites within the area where and when that need arises. It is recognised that if (later in the Revised Local Plan period) further school place capacity is required beyond this, the Legacy Corporation would need to work with the relevant boroughs to support them in their role as Local Education Authorities in planning to meet school place need (See Paras 5.59-5.64 in the draft Revised Local Plan). Since the adoption of the Adopted Local Plan in 2015 the Legacy Corporation has directly delivered, with an education partner, two primary schools and a secondary school. The Revised Local Plan retains the requirement for

							schools sites/delivery as previously identified. The original evidence on schools/school place need has been reviewed and a Schools Study undertaken with detailed input from the Schools Place Planning teams from each of the four Boroughs. It is therefore considered that the approach taken is robust and evidence based, taking account of the specific circumstances within the area. A 'Schools Explanatory Note' has been drafted to provide further background information about this approach.
PRN.010	R19.0040	C138	Section 5	Para 5.63	Mayor of Tower Hamlets	As per the summary for R19.0039, Tower Hamlets does not feel that the approach the Legacy Corporation has taken towards schools planning is sound and that more should be done to safeguard schools and capacity in the Legacy Corporation area.	See response to R19.0039

PRN.010	R19.0021	C26	Section 4	Policy B.1	Mayor of Tower Hamlets	<p>Council support the application of the sequential test for major office development outside Stratford but question the ambition for CAZ reserve and would like to understand to what extent this envisages a greater quantum of employment provision than currently permitted. Concern that this could undermine Canary Wharf as a satellite as well as supply of housing given the employment protections this would entail. Draft new London Plan is clear that Stratford would only be considered a CAZ satellite in the event of future demand for office space exceeds capacity within the CAZ and the 'CAZ reserve' status is not given any policy weight. There is no evidence to suggest a need for this reserve over plan period given planning commercial floorspace envisaged at Northern Isle of Dogs and City Fringe. Therefore reference in policy is not justified and supporting text would suffice.</p> <p>LLDC is planning on intensifying industrial land within the boundary and protection and intensification is strongly supported particularly in the SIL given under-supply identified in Tower Hamlets Employment Land Review. There is greater emphasis on intensification, consolidation and co-</p>	<p>The CAZ reserve status reinforces the approach for focussing office accommodation within the Metropolitan Centre which is already contained within the Adopted Local Plan. The Combined Economy Study sets out a number of scenarios for the demand for additional B1a office accommodation (of between 26,000sqm and 64,000sqm) over the plan period, the approach taken is, in line with the NPPF to provide for needs identified within the evidence base. These jobs assumptions are also in line with the assumptions included within the London Plan for over 30,000 jobs at Stratford City.</p> <p>The policy approach does not include a requirement for separate access and servicing by residential and industrial uses, any such requirement would be on a case by case basis.</p>
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						<p>location which is supported subject to strict criteria to protect industrial function. Support for consideration of residential amenity and mitigation with any co-location proposals (B,1 (6)). The emerging Tower Hamlets Local Plan requires separate access and servicing for commercial and residential which could be considered as a part of (6), perhaps through a management plan to outline how industrial and residential uses will be managed to reduce conflict.</p>	
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PRN.010	R19.0024	C56	Section 4	Policy B.4	Mayor of Tower Hamlets	Council supports modifications to B.4 such as terminology update and clarity on 're-provision' of workspace. Still question how policy is effective and implementation of new affordable workspace without triggers or thresholds. Further information on this and how LLDC intend to effectively implement this would be welcomed.	The Legacy Corporation has been applying this policy approach since adoption of the Adopted Local Plan in 2015 and to date circa 18,000 sqm of low cost/affordable workspace has been secured within the area.
PRN.010	R19.0043	C169	Section 6	Policy BN.11	Mayor of Tower Hamlets	The Council considers that given the level of poor air quality in the LLDC area, this policy should be further strengthened and incorporate the new air quality positive threshold in the emerging London Plan.	Policy BN.11 is considered to be in general conformity with the draft New London Plan; Para two of this policy requires all developments to demonstrate compliance with the polices in the London Plan which contribute to minimising the effects of emissions to the air (Policy SI1 Improving air quality, in part 'A 3' of the draft New London Plan) this seeks an 'air quality positive' approach in large-scale redevelopment areas and those schemes subject to Environmental Impact Assessment and for all other developments to be air quality neutral.
PRN.010	R19.0041	C155	Section 6	Policy BN.6 (formerly BN.5)	Mayor of Tower Hamlets	Information sought to clarify which policy implements the optional wheelchair standards.	Requirements that the development should respond to the need of all users is set out in Policy BN.6: Requiring inclusive design (Former Policy BN.5). This policy requires relevant residential development to meet the Optional Requirement M4

							(2) Category 2 and M4 (3) Category 3 of Part M of the Building Regulations. The only change to this policy is renumbering from BN.5 to BN.6 and deleting the final Para of Former Policy BN.5 in relation to the now superseded London Housing SPG (2012).
PRN.010	R19.0042	C159/C160	Section 6	Policy BN.9 (formerly BN.8) and Para 6.37 (formerly Para 6.28)	Mayor of Tower Hamlets	Support to the additional consideration of facilities for older children/young people.	Comment noted.
PRN.010	R19.0028	C71	Section 5	Policy H.1	Mayor of Tower Hamlets	Not clear what identifying potential locations for yielding additional housing capacity are and how capacity can plan for social or transport infrastructure. Small sites not meant to be significant in area but note small site policy requirements, but should be strengthened through reference to design policies in plan.	The Characterisation Study identifies potential small sites delivery from the different character areas. The Housing Background Paper also utilises PTAL mapping to shown the most accessible locations for housing. These will act as tools to help identify areas of search for housing capacity. The policy already refers to design policies.
PRN.010	R19.0030	C84/C85	Section 5	Policy H.2 and Para 5.19	Mayor of Tower Hamlets	60:40 social rented/intermediate mix may not be positively prepared in meeting need as LBTH SHMA suggests only 17.5% need for intermediate, at a rate below London Living Rent. LLDC evidence also suggests greater need for low cost rented.	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and is considered to strike an appropriate balance between local and strategic requirements.
PRN.010	R19.0033	C90/C95	Section 5	Policy H.3	Mayor of Tower	Support for older persons'	Noted.

				and Para 5.27	Hamlets	accommodation to provide affordable housing.	
PRN.010	R19.0034	C97	Section 5	Policy H.4	Mayor of Tower Hamlets	Support for provision of affordable student housing.	Noted.
PRN.010	R19.0036	C123	Section 5	Policy H.8	Mayor of Tower Hamlets	Should not direct off site housing even for sui generis.	The approach in the Revised Local Plan follows that contained within the New London Plan.
PRN.010	R19.0046	C221	Section 8	Policy S.7	Mayor of Tower Hamlets	Reference to Tower Hamlet's Local Plan/waste plan should be retained in para 7.8.	<p>The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change.</p> <p>A minor modification (MM35) to the supporting text is proposed as follows:</p> <p>To include reference to Tower Hamlets waste policies: <u>S.MW1: Managing our waste</u> and <u>D.MW2: New and enhanced waste facilities which are relevant.</u></p>

PRN.010	R19.0045	C220	Section 8	Policy S.7 (formerly Policy IN.2)	Mayor of Tower Hamlets	Reprovision for waste sites should be provided within the borough in which they originally were located in the first instance, before reprovision elsewhere in London is sought.	The Legacy Corporation has made minor amendments which reflect London wide policy as set out in the Draft New London Plan with regards to the reprovision of waste sites, which sets out that waste sites should be reprovided within London, rather than in the borough that a waste site was originally located in. In relation to apportionment of waste capacity to LB Tower Hamlets within the London Plan, locations within the Fish Island South Strategic Industrial Land designated area are identified in the Revised Local Plan as appropriate for waste use and so have the potential to provide capacity for new waste operations should these be required and proposed. A waste MoU has been signed between the LB Tower Hamlets and LLDC (included within the Duty to Cooperate Background Paper) that includes identification of locations suitable for waste.
PRN.010	R19.0026	C64	Section 5	Policy SP.2	Mayor of Tower Hamlets	Welcome the 35%/50% target however could be more clearly phrased when each applied. Do not support the reduced emphasis on family housing/ LBTH SHMA identified a need for 30% family housing.	It is not considered that there is reduced emphasis on the provision of family housing. The policy requirements remain the same and are supported by evidence within the Housing Requirements Study and the GLA SHMA. It is considered that an appropriate balance is struck in

							relation to the local and strategic requirements.
PRN.010	R19.0047	C252	Sub Area 1	SA1.3 – Hepscoth Road	Mayor of Tower Hamlets	The Council acknowledges the existing application for the McGrath site and London Plan policy position relating to the transfer of waste capacity. The proposed amendment (which deletes the wording that ensures that the approach counts towards the boroughs apportionment) should be retained, or at a minimum amended to ensure that it has been demonstrated that the loss of capacity does not have a significant detrimental impact on the borough's ability to meet its apportionment target.	The site (Site Allocation 1.3 Hepscoth Road) has a resolution to grant planning permission for mixed-use redevelopment in accordance with the requirements of the site allocation in the adopted Local Plan (Application reference 16/00451/OUT). In making this decision, the LLDC Planning Decisions Committee, considered the matters related to waste use of the site. It is anticipated that the permission will be issued in the near future on completion of the S106 Agreement. The site owner/operator is in the process of moving their waste management activities to new site in Barking, meeting the London Plan policy requirements for such relocations to be within London. The changes proposed to the site allocation wording reflect the principle established through the resolution to grant planning permission, not removing the waste safeguarding unless relocation of waste use elsewhere within London is secured. In relation to apportionment of waste capacity to LB Tower Hamlets within the London Plan, the locations within the Fish

							<p>Island South Strategic Industrial Land designated area are identified in the Revised Local Plan as appropriate for waste use and so have the potential to provide capacity for new waste operations should these be required and proposed. A waste MoU has been signed between the LB Tower Hamlets and LLDC (included within the Duty to Cooperate Background Paper) that includes identification of locations suitable for waste. Given this background, the proposed change to the wording of the site allocation is considered to be appropriate and proportionate.</p> <p>minor modification is required to correct the policy reference within the site allocation which should now read as Minor Modification reference MM38: <u>Policy S.7</u> rather than Policy IN.2</p>
PRN.010	R19.0019	C14	Section 3	Vision and Objectives	Mayor of Tower Hamlets	It would be useful to understand what analysis was undertaken to determine which policies are strategic and which not.	The new Para 3.7 sets out the reasoning behind identifying those policies that are strategic, i.e. the test that was applied. New Table 1 sets out lists of both Strategic and Non-strategic policies for clarity.
PRN.011	R19.0049	C17	Section 5		GLA	All development plan documents must be in general conformity with the London Plan under the PCPA 2004. TfL has also provided comments which are	Noted.

						in Annex 1. Letter sets out where some amendments may be required to ensure more in line with London Plan and draft New London Plan. The draft New London Plan was published in December 2016 and in August 2018 some minor suggested changes were made. The examination will commence in January 2019 with adoption anticipated winter 2019/2020. This will form the Development Plan and LLDC Local Plan must be in general conformity with current Plan but policies which diverge from new plan will become out of date as the new London Plan gains more weight. So draft New London Plan and evidence base are now material considerations.	
PRN.011	R19.0065		Section 7		GLA	Provides context around the capacity challenges at Stratford Station and the stakeholders who are working together with regards to these challenges and some of the potential solutions. Sets out that TfL will continue to work with the LLDC and other stakeholders to deliver interventions. Welcomes the updated references to the need to improve access to Stratford Station.	Comment noted

PRN.011	R19.0055	C32	Section 4	Para 4.13	GLA	Para 4.13 wording is unclear and should be amended to make clear that large scale office developments over the threshold should consider the provision of low cost business space and affordable workspace.	The wording of Para 4.13 does already refer to the 2,500sqm threshold however the Legacy Corporation is willing to accept that a proposed change could assist in the clarity. Please see proposed minor modification MM10: <u>Proposals of this scale over 2,500 sqm</u> should also consider the provision of space suitable for SME including affordable workspace or low-cost business space, see Policy B.4. Table 4 sets out further detail of the role of each Centre in relation to main town centre uses.
PRN.011	R19.0051	C22	Section 4	Para 4.4	GLA	Mayor welcomes potential identification of Creative Enterprise Zone at Hackney Wick and Fish Island which was assessed and announced as successful on 14th December 2018.	Noted
PRN.011	R19.0061	C29	Section 4	Para 4.9	GLA	Revised Para 4.9 should recognise that the draft London Plan identifies the LLDC area as 'retain capacity' area for industrial land and strategic approach is one of no net loss of industrial capacity as set out in E4 (c). Principle of no net loss of industrial capacity should be applied to site allocations where industrial capacity should be retained as part of future development and should not be lost to B1a uses.	The Legacy Corporation is willing to accept that a proposed change could assist in the clarity. Please see proposed minor modification MM8: The Draft New London Plan requires that the Legacy Corporation area 'retains capacity' of industrial land <u>which involves a no net loss of industrial capacity</u> .
PRN.011	R19.0058	C75	Section 5	Para 5.11	GLA	H12 states should not set prescriptive	It is not considered that the policy as

					<p>dwelling size policies by bedrooms for market and intermediate. Should provide need by bedrooms to ensure affordable housing meets needs so should apply the half units having more than 2 bedrooms requirement flexibly where required.</p>	<p>drafted is too prescriptive as it allows for a 'balanced mix' of 1, 2 and 3 bed dwellings. The policy itself sets out that schemes should contain a mix of 1, 2 and 3 bedroom properties, and that more than half of the total should be 2 bedroom plus. Paras 5.10 and 5.11 set out that there are particular identified needs for 2 bedroom homes within market and affordable sectors, 3 bedroom affordable homes and low cost rented 1 beds. Crucially it also states that site specific circumstances will be key considerations in determining mix and a number of site allocations highlight where family housing (3 bed plus) are particularly sought (eg SA2.1, 2.2, 2.3, 2.4 and 4.3), therefore the plan has an additional level of flexibility in this.</p> <p>The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA (2017) and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.</p>
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PRN.011	R19.0059	C78	Section 5	Para 5.14	GLA	Para 5.14 states proposals which address stock imbalances by introducing market and intermediate homes within social rented areas would be appropriate and approach to create mixed and inclusive communities is welcome reflecting GG4.	Noted.
PRN.011	R19.0062	C91	Section 5	Para 5.23	GLA	Para 5.23 states non self-contained accommodation will be monitored on a 3:1 basis. The draft New London Plan states that this should be a 1:1 basis so should be amended. The term residential sheltered care homes should also be amended to residential nursing care accommodation to reflect london plan. To avoid confusion sheltered accommodation is considered C3.	Para 5.23 refers to 3:1 ratio for older persons accommodation in error. The Housing Background makes it clear that a 1:1 basis is intended so will be corrected within the Revised Local Plan. The references will also be amended to reflect the draft New London Plan terminology. Please see proposed minor modification MM22:For the purposes of clarification, non-self-contained older person's accommodation will be monitored on the basis of <u>1 3</u> -bedspaces accounting for a single home.
PRN.011	R19.0063	C94	Section 5	Para 5.26	GLA	London Plan does not include an older persons benchmark for LLDC but the Housing Requirements Study (2018) provides figures of demand. Therefore LLDC should work to identify sites suitable for specialist housing. Amendments should be made to ensure consistency with regard to terminology of 'over 10 units' and 'ten units and more'.	The Legacy Corporation is willing to accept the proposed minor amendment to be consistent in wording and reference to sites that are known suitable for specialist accommodation. Please see proposed minor modification MM23: <u>Taking these matters into consideration all site allocations are considered suitable for specialist older persons accommodation.</u>

							<p>Para 5.21 will also be amended for consistency referring to 'ten units or more'. See proposed minor modification MM20: Policy H.2 will apply to all residential schemes over <u>of 10</u> units or more or on sites of over 0.5 hectares, including future changes of use of residential floorspace..... In accordance with the Draft New London Plan Estate regeneration schemes should go through the VTR. Policy H.2 will apply to all residential schemes <u>of 10 units or more</u> over 10 units.</p>
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PRN.011	R19.0052	C26, C29 and C 35	Section 4	Policy B.1	GLA	<p>Welcome approach to continued safeguarding and intensification of industrial capacity through consolidation and co-location which reflects London Plan industrial land supply and demand evidence. Approach is consistent with emerging London Plan policies E4-E7 which identify that LLDC should retain capacity. Strategic approach is not entirely about job density and should recognise that some industrial use for logistics and distribution are of particular importance in support for the CAZ but have low job densities.</p> <p>In 2015 36% of London’s industrial land was non-designated and of significant importance to London. Amendments to B.1 should retain B2 and B8 uses in accordance with London Plan E7 which states that mixed use and residential on non-designated land should prioritise retention of existing B2 and B8 capacity through mixing uses or through process of intensification and not merely allowing to change to other B class. Additional capacity for other B class uses will only be welcome on proviso that existing B2/B8 capacity is re-provided or increased and it does not compromise ability of industrial uses to operate effectively. This approach</p>	<p>Noted. The Legacy Corporation is willing to accept that reference to the job densities variations and prioritisation of B2/B8 uses could assist in the clarity of the Revised Local Plan. Please see proposed to new Para 4.14 minor modification MM11: For the purposes of clarity, due to the limited amount of storage and distribution uses within the LLDC area it is not considered that substitution will be appropriate, <u>however such uses are of particular importance in support for the CAZ despite their relatively low job densities.</u></p> <p>An additional modification to new Para 4.14 is also proposed to highlight that proposals within or adjacent to SILs should not compromise the integrity or effectiveness of the locations in providing industrial-type activities on a 24 hour basis has also been proposed. Please see proposed minor modification MM13: <u>Within or adjacent to SILs proposals should not compromise the integrity or effectiveness of the location in accommodating industrial type activities and their ability to operate on a 24-hour basis. For all clusters,</u></p>
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						<p>should be applied to para 4.15 for Hackney Wick and Fish Island.</p>	<p><u>where</u> identified within Table 3, residential will be appropriate when the employment-generating potential and industrial floorspace capacity are maintained and amenity and servicing issues have been addressed.</p> <p>It is considered that the approach within the Revised Local Plan already prioritises re-provision of B2 and B8 use classes, with further explanation in Para 4.16. However for clarification an additional amendment to Policy B.1 is proposed for Bullet 5 (a) to state that re-provision of B2/B8 will only be acceptable 'where appropriate'. See proposed minor modification MM6: Proposals involving a change from B2 or B8 Use Class floorspace (including working yardspace) shall re-provide industrial floorspace capacity within the same use class category or, <u>where appropriate</u>, intensify capacity through increased job densities within other B Use Classes, according to location by applying the town centres first principle; or</p>
PRN.011	R19.0066	C163	Section 6	Policy BN.5	GLA	Notes the introduction of a new criteria into Policy BN.5 to require significant	The Revised Local Plan has been supported by preparation of a draft

				(formerly BN.10)	additional public benefit where tall buildings are proposed above the threshold height outside of locations identified in the Revised Local Plan as suitable for tall buildings (i.e. within the Centres or locations identified within specific site allocations). Considers that further guidance should be provided in the supporting text to clarify this requirement.	<p>Characterisation Study for the LLDC area that sets a baseline for the character areas identified. This has helped to reinforce the existing approach within the Revised Local Plan that directs tall buildings mainly to the designated centres, while in all cases ensures that taller buildings will remain appropriate to their context. It is therefore considered proportionate to ensure that there is a wider benefit from development that is greater than the prevailing or generally expected heights in that location. In order to ensure that it is clear that those benefits would need to be genuine material considerations in relation to the scheme proposed, a minor modification MM28 to the supporting text is proposed as follows:</p> <p>Add to end of new Para 6.24 (Change C164) MM28: <u>"That benefit would need to be relevant to the development proposed and relate to specific requirements set out in relevant policies or site allocations within this Local Plan."</u></p> <p>It is not considered appropriate to</p>
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							provide detailed guidance as potential benefits are likely to be specifically related to individual scheme proposals. It is also considered necessary to retain flexibility within the policy to ensure that it does not result in a barrier to proposals for buildings above the identified threshold that might otherwise be beneficial and acceptable in planning terms.
PRN.011	R19.0057	C67, 71, 73	Section 5	Policy H.1	GLA	Welcome the additional text regarding housing delivery and diversifying the housing developments on small sites. No objection to small sites target being compressed in line with minor suggested change to H3ba.	Noted.
PRN.011	R19.0060	C84	Section 5	Policy H.2	GLA	H.2 draft new London plan places more weight on ensuring affordable housing provided on site, particular for schemes of over 25 units. H5 (b) now states must be provided on site with cash in lieu in exceptional circumstances. See H2 and H6 which provide flexibility for small schemes.	The Legacy Corporation is willing to accept the proposed minor amendment to insert reference to 'exceptional circumstances'. Given that the policy already sets out the circumstances where off-site contributions may be appropriate these are indeed those 'exceptional' circumstances so it not a change in policy approach. Please see proposed minor modification MM19: ...Financial contributions will only be acceptable <u>in exceptional circumstances</u> when on-site provision and all potential off-site options have been fully explored and

							discounted, and linked to a particular site or proposal.
PRN.011	R19.0064	C104	Section 5	Policy H.5	GLA	Welcome inclusion of the draft New London Plan definition of gypsies and travelling showpeople in the Revised Local Plan. While LLDC has identified provision for those meeting the PPTS definition no provision for the further 15 pitches required. Revised Local Plan sets out commitment to work with neighbouring authorities in finding appropriate sites and monitoring delivery on annual basis. Further capacity needs to be found and so should be amended to state that the "Legacy Corporation <u>will</u> provide".	It is considered that the current wording for the Legacy Corporation to continue to work with the boroughs and other stakeholders to facilitate the delivery of the site allocation for gypsy and traveller use is appropriate given that the Legacy Corporation is not the relevant housing authority.
PRN.011	R19.0056	C63 & C66	Section 5	Policy SP.2	GLA	Welcome commitment to deliver in excess of the 2161 pa target. If rolled forward it would be in excess of 22,000 homes to be delivered for 2020-2036. Welcome the 5% buffer in the trajectory however PPG states the Mayor should distribute the total housing requirement for London. Para 3.19a of the London Plan states to support the range of activities and function in London buffers should not lead to approval of schemes compromising sustainable development, in line with NPPF. 35% affordable housing figure is not a target but as baseline for the threshold approach in H6 and H7. Strategic target is 50% and policy should	The Housing Delivery Explanatory Note (2019) provides some additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan. The implications of the buffer on sustainable development is noted. In relation to the 35% not being a target the Legacy Corporation is willing to propose a minor amendment to make the clarification that the strategic target across London is 50%. Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a

						distinction clear.	<u>strategic target of 50% affordable housing across London. The Legacy Corporation will apply the Mayor's</u> an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity
PRN.011	R19.0054	C321	Sub Area 4	SA4.5	GLA	Sets out the types of development that would be acceptable within the SIL designation that covers SA4.5, and the context in which any land could be released from this designation. Advises that a masterplan should be produced for the site allocation.	Comment noted. SA4.5 sets out the principles for development of the site, it does not advocate non-SIL uses within the SIL designated area. SA4.5 sets out the requirement for the production of a masterplan for the whole site allocation.
PRN.011	R19.0050	C25	Section 4	Table 2: Direct jobs from proposals	GLA	Table 1 estimates provision of 55,000 jobs to 2031 and the current London Plan identifies Stratford as the strategic office centre beyond central London with capacity for 50,000 jobs including 30,000 office jobs at Stratford City. In relation to the potential CAZ extension at Stratford, the Mayor is please that office generating uses will be directed there in accordance with draft London Plan para 2.4.3. Draft New London Plan E1 identifies Stratford as location for CAZ-type office functions.	Noted

PRN.011	R19.0053	C39	Section 4	Table 3, B. 1a1	GLA	Table 3 gives Here East a sub category of SIL designation which recognises that the area is occupied by modern development comprising of a variety of businesses, education and leisure uses. While these diverge from E4 of the London Plan it is considered that the development and infrastructure of the site would allow SIL uses to occur. Given loss of SIL in London over 10 years Mayor considers SIL designation maintains importance of preserving industrial uses and longer term role as reservoir for London. Should make clear priority is retention of industrial capacity and such uses can support existing site functions.	The Legacy Corporation is willing to accept the proposed minor amendment to Table 3, B.1a1 to make clear that the priority is retention of industrial capacity. Please see proposed minor modification MM12: ... <u>At this location the priority will be retention of industrial capacity, including uses which support existing site functions.</u>
PRN.012	R19.0089	C221	Section 8	Policy S.7	NLWP	Provides an update on the timetable for the NLWP, with a projected adoption date of 2020. The removal of the reference to Tower Hamlets waste policy is also identified with a request for this reference to be reinstated.	The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change. A minor modification (MM35) to the supporting text is proposed as follows: ' <u>To include reference to Tower Hamlets waste policies: S.MW1: Managing our waste and D.MW2: New and enhanced waste facilities which are relevant</u> '

PRN.012	R19.0088	C220	Section 8	Policy S.7 (formerly IN.2)	NLWP	Sets out the background of the North London Waste Plan (NLWP) and highlights the Memorandum of Understanding (MoU) between the Legacy Corporation and the NLWP. The waste sites in Hackney and Waltham Forest that are identified within the NLWP are listed with suggested inclusion within the Revised Local Plan. The NLWP objects to the change around re-provision of waste facilities from within the London Borough in which the waste site is currently located to London wide re-provision and the challenges this causes the NLWP is explained.	The MoU between the NLWP and the Legacy Corporation is an example of both parties continuing to work together on matters related to waste in the NLWP area, and the Legacy Corporation will continue to engage with the NLWP on these issues. The Legacy Corporation does not identify specific sites in relation to waste, instead the Revised Local Plan sets out areas in which waste sites may be located where they meet the acceptability criteria in set out in policy, including areas of Strategic Industrial Locations (SIL) (Fish Island Sough and Bow Goods Yard) and Locally Significant Industrial Sites (LSIS). Those areas appropriate for waste usage are set out in further detail in Table 3 of the Revised Local Plan. The Revised Local Plan reflects London wide policy within the Draft New London Plan in regard to the re-provision of waste sites. The Draft New London Plan sets out that wastesites may be re-provided within London, rather than in the borough where the existing waste site is currently located.
PRN.012	R19.0090	C184	Section 7	Policy SP.4	NLWP	Concerns around the removal of the reference to utility infrastructure within Policy SP.4, especially in relation to	Comment noted, these references have been moved to Section 8. All utilities have been moved to Section

						waste requirements.	8 to ensure that they sit together and are easier to read, understand and apply rather than sitting across two sections.
PRN.013	R19.0075		Sub Area 3		TfL	Check spellings of Montfichet Road	Noted A number of minor corrections are proposed, see MM54.
PRN.013	R19.0074		Section 7	Figure 25	TfL	Suggested amendments to Table 7 or Figure 25 with the addition of strategic cycle infrastructure.	The Legacy Corporation is willing to accept the proposed minor amendment. Minor modifications (MM33/MM34) to Figure 25 is proposed as follows: Figure 25 –add in "strategic cycle infrastructure, such as Cycle Superhighway 2 or Quietway 6 or Lea Valley tow path cycle routes"
PRN.013	R19.0080		Sub Area 3	Figure 35	TfL	Figure 35 should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance and Jupp Road footbridge should be shown as a key connection.	Although this does not related to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM51 and correction in relation to location of Jupp Road bridge.
PRN.013	R19.0067	N/A	General Comments	General	TfL	TfL welcomes the publication version of the document and generally supports the proposals, which makes relevant updates to reflect the draft London Plan and policy initiatives such as Healthy Streets. There are several suggestions for non-material minor wording	Comments noted. Responses to detailed comments are set out against specific proposed changes elsewhere in this schedule.

						changes and updates to maps and figures set out in the detail of the response. Recognises joint working with TfL, LLDC, LB Newham and other stakeholders on delivery of an integrated congestion relief scheme for Stratford Station and welcomes references in the draft revised Plan to relevant interventions.	
PRN.013	R19.0082		Sub Area 4	General	TfL	For clarity makes a request that references to 'Pudding Mill' are checked, as the area is called 'Pudding Mill' and 'Pudding Mill Lane' as the DLR station, for the avoidance of confusion.	Comment noted. Whilst Pudding Mill is the name of the area, Pudding Mill Lane is the name of the DLR station, and this can cause some confusion. However, references to Pudding Mill relate to changes within the area or describe the area itself whereas Pudding Mill Lane DLR station refers directly to the station. Therefore these references have been checked and, as the representation does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018), the suggested change is not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.013	R19.0078		Sub Area 3	Para 12.13	TfL	Para should be amended to reference capacity constraints at Stratford station	Although this does not relate to a proposed change, in the interests of

							clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM48: The excellent accessibility of the Sub Area is compromised in some locations by physical barriers of roads, railways and waterways, <u>and by the capacity constraints experienced at Stratford station.</u>
PRN.013	R19.0079	C293	Sub Area 3	Para 12.14 (formerly 12.12)	TfL	Para should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance.	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM49: The Legacy Corporation will work in partnership with other relevant bodies including local communities to improve connections <u>and station capacity and multi-modal interchange</u> , particularly on key projects, such as the Jupp Road bridge and improvements to the <u>western new entrances and interventions</u> to Stratford Regional Station
PRN.013	R19.0076	C282	Sub Area 3	Para 12.3	TfL	Should add an additional bullet "Enhancing access to and internal capacity at Stratford station"	The Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM44: <u>• Enhancing access to and internal capacity at Stratford station</u>

PRN.013	R19.0084		Sub Area 4	Para 13.8	TfL	Proposes additional wording to Para 13.8 to include reference to capacity at Bromley-by-Bow station in relation to proposed improvements, as proposed for policy 4.4.	The Legacy Corporation is willing to accept the proposed minor amendment. A minor modification (MM61) to the supporting text is proposed as follows: Improvements are proposed at Bromley-by-Bow station to improve accessibility <u>and capacity</u> , create step-free access...
PRN.013	R19.0087	C100	Section 5	Para 5.30	TfL	Reference to walking and cycling should be added to public transport accessibility in this Para.	The Legacy Corporation is willing to accept the proposed minor amendment to include reference to walking and cycling within Para 5.30. Please see proposed minor modification MM25: ...are considered most appropriate for PBSA due to the enhanced <u>walking, cycling and</u> public transport accessibility...
PRN.013	R19.0086		Section 7	Para 7.11	TfL	Assessment around additional funding and Section 106 agreements.	Comment noted. Section 106 agreements and other funding are assessed on a site by site and project by project basis in line with policy and guidance such as the Legacy Corporation's Planning Obligations SPD. The Legacy Corporation will continue to work with TfL around travel infrastructure within the Legacy Corporation and related requirements.
PRN.013	R19.0073	C195	Section 7	Para 7.13	TfL	Suggested amendments to wording to Para 7.13 - "and new platforms network	The Legacy Corporation is willing to accept the proposed minor

						capacity improvements at Stratford station.”	amendment. A minor modification (MM32) to the supporting text is proposed as follows: ...and new platforms network capacity improvements at Stratford station.
PRN.013	R19.0069		Section 7	Para 7.5	TfL	Suggested wording to expand Para 7.5 - “Analysis shows (that the planned growth can be accommodated without significant new public transport investment, as long as) the planned and emerging growth in the Legacy Corporation area and east London needs to be co-ordinated with enhancements to public transport network capacity and station capacity, alongside local connectivity improvements are brought forward with an emphasis on walking and cycling and smarter travel choices built into new developments.”	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the ‘Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.013	R19.0070		Section 7	Para 7.5	TfL	Suggested wording change to Para 7.5 - “Improvements to public transport and improved access and capacity to stations in the area... Such schemes include an integrated congestion relief scheme (comprising new access and interchange) at the new entrance at Stratford station” “Improvements to Stratford station as	The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change. A minor modification (MM30) to the supporting text is proposed as follows:

						part of an integrated congestion relief scheme access and station upgrade.”	<p>3. Improvements to public transport and improved access <u>and capacity</u> to stations in the area... Such schemes include an integrated congestion relief scheme (comprising new access and interchange) at the new entrance at Stratford station....</p> <p><u>...6. Improvements to Stratford station as part of an integrated congestion relief scheme access and station upgrade.</u></p>
PRN.013	R19.0071	C192	Section 7	Para 7.8	TfL	<p>Suggested amendments to wording to Para 7.16 - “Transport for London (TfL) and Network Rail are working closely together to develop Crossrail 2. The proposed route map as confirmed in 2015 the 2018 Mayor’s Transport Strategy would provide a link across London’s southwest to northeast corridor from the north east to the south west. The concept of an eastern branch has previously been explored and focused on an alignment through Hackney, Newham and beyond and Haringey and Network Rail branches. An eastern branch could provide significant benefits to the Legacy Corporation area and continues to be a priority for the growth boroughs that it would include.”</p>	<p>The Legacy Corporation is willing to accept the proposed minor amendment.</p> <p>A minor modification (MM31) to the supporting text is proposed as follows: Transport for London (TfL) and Network Rail are working closely together to develop Crossrail 2. The proposed route map as confirmed in <u>2015 the 2018 Mayor’s Transport Strategy</u> would provide a link across London’s <u>southwest to northeast corridor</u> from the north east to the south west. The concept of an eastern branch has previously been explored and focused on an alignment through Hackney, <u>Newham and beyond and Haringey</u> and Network Rail branches. An</p>

							eastern branch could provide significant benefits to the Legacy Corporation area and continues to be a priority for the growth boroughs that it would include.
PRN.013	R19.0077	C292	Sub Area 3	Policy 3.3	TfL	Para should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance.	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM47: The Legacy Corporation will work with its partners to promote improved connectivity and public realm improvements shown as key connections, key connections to be enhanced and principal connection improvements within Figure 35, in particular a new pedestrian bridge from Jupp Road and facilitating a western entrance to <u>new entrances and interventions at Stratford Regional Station</u> .
PRN.013	R19.0083	C308	Sub Area 4	Policy 4.3	TfL	Proposes that the word 'capacity' is added to policy 4.4 to reflect the true nature of proposed works and improvements to Bromley-by-Bow station.	The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change. A minor modification (MM60) to the policy is proposed as follows: In considering proposals to improve Bromley-by-Bow Station, to further enhance the existing improvements that have been made, the Legacy

							Corporation will support proposals that improve accessibility <u>and capacity</u> to and within the station and enhance its visual presence within the area.
PRN.013	R19.0068	C149 and C163	Section 6	Policy BN.4 and BN.5 (formerly BN.10)	TfL	Support to the increased references to streetscape, public routes and spaces, Healthy Streets, public realm.	Comment noted.
PRN.013	R19.0072	C193 and C 196	Section 7	Policy T.2 & T.4	TfL	Supports references to Mayor's target for 80% of journeys being undertaken by active travel or public transport by 2041.	Comment noted
PRN.013	R19.0081	C301	Sub Area 3	SA3.4	TfL	Bullets should be amended to reflect a range of potential connectivity interventions at Stratford Station not only the western entrance	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment to the supporting development principles (with modifications to take account of other representations). Please see proposed minor modification MM57: <ul style="list-style-type: none"> • Maximise and reflect in any new development or public realm improvement the potential arising from pedestrian movement to and from a new <u>southwestern</u> entrance to Stratford Regional Station and improvements to the Jupp Road bridge •The identified <u>options</u> for the new western entrances <u>at Stratford</u>

							Regional Station and delivery of a western overbridge should be incorporated into redevelopment proposals for this site
PRN.013	R19.0085	C320	Sub Area 4	SA4.5: Bow Goods Yards (Bow East and West)	TfL	Sets out reasoning around why a masterplan should be put in place for SA4.5 to support and guide future development on the site. Whilst no wording changes are put forward, concerns around a future masterplan and the impact it might have on the transport network in the area, especially with the potential for direct road access to the A12 to be put in place, combined with TfL's role in delivering projects in the area are set out.	Comment noted. SA4.5 puts in place the requirement for the production of a masterplan for the whole site allocation. It is acknowledged that TfL will be a key consultee for any masterplan development for or planning applications within the site allocation.
PRN.014	R19.0092	C163	Section 6	Policy BN.5 (formerly BN.10)	Here East	The requirement for proposals to “achieve significant additional public benefit” is a policy test which is inconsistent with National Planning Policy, and the Draft New London Plan. The test of public benefit only applies in relation to designated heritage assets. The determination of planning proposals which do not accord with a Development Plan require an assessment of material considerations. Such material considerations could cover a substantially broad range of benefits from a proposed development. Similarly, the burden of this policy test would hinder the delivery of	It is considered that there is nothing within the NPPF or the draft New London Plan that would prevent the introduction of this test within the Policy. However, a minor amendment is proposed to the supporting text to provide clarification about how the test would be applied in a way that would be material and relevant to the individual application proposal (See response to PRN.011 and R19.0066 for proposed minor modification). The proposed minor modification MM28 is as follows:

						development which would otherwise have material considerations which weigh in favour of such an application.	MM28, add to end of new Para 6.24 (Change C164): "That benefit would need to be relevant to the development proposed and relate to specific requirements set out in relevant policies or site allocations within this Local Plan."
PRN.014	R19.0091	C256	Sub Area 1	SA1.5 – East Wick and Here East (Formerly SA1.7)	Here East	<p>Supports the aim of Site Allocation SA1.5 East Wick and Here East, including the 'intensification and redevelopment of under-utilised areas'. Considers that this is supported by Paras 118 and 127 of the NPPF along with policies D6 and D8 of the draft New London Plan addressing tall buildings and optimisation of density. Considers that under-utilised parts of the site have the potential to accommodate a tall building which could create a significant landmark at an important economic location within the QEOP and provide substantial job creation. Considers the site allocation should include reference to the site being a suitable location for a tall building.</p> <p>Considers this is supported by the following:</p> <ul style="list-style-type: none"> • Here East is located outside of the Local Plan Review key views, and the 	Comments are noted. However, it is not agreed that there is a need to include a reference Here East as being suitable for a tall building. This would be out of line with the overarching character, policy and planning guidance that has become established for Hackney Wick and Fish Island. Here East does not form a part of the Hackney Wick Centre where taller buildings are considered to be potentially more appropriate. The Adopted Local Plan established a threshold of 20 m above ground level, above which height development proposals would be subject to the policy tests in Policy BN.10. The Revised Local Plan continues this threshold and approach (with Policy BN.10 being redrafted as Policy BN.5). Therefore, any development proposal brought forward for redevelopment or intensification within Site Allocation

					<p>Wider Setting Consultation Area for the LVMF SPG (Local Plan Review Figure 18). Its location is not constrained by these views. It would create the opportunity for a new view and landmark within the north west of the QEOP to mark the main economic area of the QEOP, which does not currently incorporate significant variation in the scale of buildings.</p> <ul style="list-style-type: none"> • It is expected that the detailed design of a development would be able to accommodate design features and mitigation to ensure that it is acceptable in respect of micro-climatic conditions, and the amenity of the surrounding area. Here East is a large site, with capacity within the site boundaries to accommodate a tall building without impacts on the amenity of surrounding residents. • Here East could meet all of the policy requirements as a suitable location for tall buildings. It is an accessible location, increasingly being proven through the location of significant new businesses to the campus, and within the context of future development of East Wick and Sweetwater, will create a range of facilities for both residents and employees. 	<p>SA1.5 would, if it were above the threshold, simply need to be tested through the policy criteria in order to establish whether that the level of height proposed would be acceptable within its context and area character. It is noted that while there is no current proposal of which the Local Planning Authority is aware, Here East consider that it would be possible for a tall building proposal to pass the policy tests.</p>
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						It is therefore proposed that the following reference is included in Site Allocation SA1.5: "Tall buildings may be acceptable in this location subject to Tall Buildings Policy".	
PRN.014	R19.0093	C39	Section 4	Table 3 – B.1a1	Here East	Here East supports changes to Table 3 which reflect diversity of uses curated at the campus. Changes also recognise the opportunities for intensification and redevelopment of under-utilised areas will be supported. Seeking to optimise the use of land this is considered to positively prepare the effective approach to supporting future potential development at Here East. To clarify the mix of uses it should be amended to "A range of complementary employment uses within B1 and B8 Use Classes, D1 and further and higher education uses, including [...]" Welcome the continued development of the Local Plan and amendments which have been incorporated to date to reflect the ecosystem of the campus. As Here East continues to fill opportunities for intensification and redevelopment are recognised and amendments proposed through representation shall be required to ensure plan is positively prepared and effective in delivery. Trust this is clear but happy to engage further.	The Legacy Corporation is willing to accept the proposed minor amendment to include reference to higher education to the proposed change to assist in clarity. Please see proposed minor modification MM14: A range of complementary employment uses within B1 and B8 Use Classes, D1 and <u>higher</u> /further education uses, including creative and technology-based industries, light industrial, offices, research and development, media, broadcasting and production uses, culture/arts and smaller workshops. Also including supporting uses of conference facilities within D2 Use Classes, and small-scale retail and leisure.

PRN.015	R19.0101	C24	Section 4	Figure 4	Bellway Homes (Thames Gateway)	Figure 28 identifies a number of employment clusters as part of the economic strategy. The diagram remains schematic and is not clear where boundaries start and end. Long term allocation of sites for employment where no reasonable prospect of coming forward is contrary to NPPF para 120 where applications for alternative uses should be supported where proposal would meet an unmet need. It is questionable whether the proposed allocation meets the rest of soundness and whether allocation of OIL at Cooks Road is based on objectively assessed needs and long term allocation does not meet the objective of sustainable development. Figure 4 should be amended to make boundaries clearer.	It is considered that given that industrial uses are already located on employment cluster B.1b6 Para 120 of the NPPF does not apply. Clear boundary delineations are shown on the Policies Map. Figure 4 sets out the economic strategy.
PRN.015	R19.0094	N/A	General Comments	General	Bellway Homes (Thames Gateway)	States that the NPPF requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the	Comment noted.

						NPPF and should be aspirational but realistic. Para 31 requires all policies to be underpinned by relevant and up-to-date evidence that is both adequate and proportionate, and focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.	
PRN.015	R19.0095		Section 1	n/a	Bellway Homes (Thames Gateway)	Identifies that has no comment on this section of the Revised Local Plan.	Comment noted.
PRN.015	R19.0096		Section 2	n/a	Bellway Homes (Thames Gateway)	Identifies that has no comments on Section 2 of the draft Revised Local Plan.	Comment noted.
PRN.015	R19.0125	C307	Sub Area 4	Policy 4.2	Bellway Homes (Thames Gateway)	Supportive of new connections in the sub area however suggests new wording around provision of new bridges and related utilities infrastructure and viability, to ensure that requirements are not overly onerous on development.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Only one change has been made to Policy 4.2 to delete reference to a cycle superhighway route along Stratford High Street which has been delivered since the date of the Adopted Local Plan. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.

PRN.015	R19.0100	C26	Section 4	Policy B.1	Bellway Homes (Thames Gateway)	<p>Local plans should respond flexibly to market needs and adapt to changing circumstances. To ensure deliverability and flexibility policies should stimulate development of employment floorspace whilst retaining sufficient flexibility to respond to market conditions. There is sufficient flexibility built into the policy.</p> <p>Table 3 identifies the area to the south/south-west of Cooks Road as an Other Industrial Location employment cluster which is supported as a buffer zone to the rest of the Pudding Mill area. Should ensure that industrial uses here do not prejudice delivery of residential where more appropriate (north/north-east). Welcome that Table 3 continues to state that cluster should deliver employment floorspace alongside other uses including residential to aid transition across area. Support intensification of industrial uses which accords with Policy 2.13 of the London Plan (Opportunity and Intensification areas). Proposed mix of uses, including residential, within OIL is welcomed however requirement to protect industrial floorspace capacity for uses identified in table 3 is too restrictive and does not enable these areas to respond flexibly to market demand and changing business</p>	<p>It is considered that: (a) the thrust of the policy has not changed significantly and (b) given that industrial uses are already located on employment cluster B.1b6 Para 120 of the NPPF does not apply.</p>
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					<p>circumstances.</p> <p>Policy B.1 (5) safeguards both non-designated industrial sites and OILs for employment uses appropriate to their designations, stating that proposals for non-compliant uses (ie not in Table 3) or relevant site allocation will not be permitted unless criteria are met. Part 5a however does permit re-provision of B2/B8 through intensification of existing capacity through increased job densities within B class uses which is welcomed. Ultimately long-term protection of clusters is likely to be restrictive and could ultimately preclude promotion of sustainable development in appropriate locations. Policy should recognise that sites should be considered on own merits considering what is deliverable. Policy should be re-worded to allow for managed release of strategic employment sites for other uses where there is an unmet need in line with NPPF. It should enable OIL to respond flexibly to changing market needs. Requirement to maintain existing balance of uses as identified in table 3 or relevant site allocations should be removed. The full range of B class uses and sui generis employment generating uses should be encouraged.</p>	
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PRN.015	R19.0102	C41	Section 4	Policy B.2	Bellway Homes (Thames Gateway)	Policy should recognise the opportunities for mixed use development outside centres where harm can be mitigated in context of infrastructure, environmental and town centre impacts. Policy should be amended to reflect acceptability of town centre uses outside main town centres.	Policy B.2 as currently drafted does allow for a mix of uses outside the centres subject to meeting appropriate policy tests.
PRN.015	R19.0103	C52	Section 4	Policy B.3	Bellway Homes (Thames Gateway)	Supportive of policy principle and opportunities should be taken to enliven underused areas. Careful consideration should be afforded to viability assessments to ensure preparation is not prejudiced by existing use values/alternatives. Appropriateness of interim uses need to ensure they do not conflict with function of allocated used in terms of general amenity, odour, air quality and noise, in accordance with Agent of Change.	Noted. Policy BN.12 deals with the agent of change principle.
PRN.015	R19.0104	C56	Section 4	Policy B.4	Bellway Homes (Thames Gateway)	Inclusion of low cost and managed workspace should be subject to overall scheme viability and should be balanced with delivery of affordable housing and family accommodation.	Noted Policy B.4 sets out that existing affordable workspace or low cost business space shall be retained or re-provided in accordance with Policy B.1 therefore the policy is sufficiently flexible to take account of all other policy requirements.

PRN.015	R19.0105	no change proposed	Section 4	Policy B.5	Bellway Homes (Thames Gateway)	Delivery of employment opportunities through construction phase should include reference to viability.	Noted . The policy is sufficiently flexible to allow for other site-specific considerations to be taken into account.
PRN.015	R19.0106	no change proposed	Section 4	Policy B.6	Bellway Homes (Thames Gateway)	Welcome identification of Pudding Mill as area suitable for higher education, research and development but should define higher education.	Noted. Standard definitions of higher education are utilised however the Legacy Corporation is willing to accept the proposed minor amendment to insert a definition in the glossary. Please see proposed minor modification MM66.
PRN.015	R19.0119	C144	Section 6	Policy BN.1	Bellway Homes (Thames Gateway)	The policy should be positively prepared so as to achieve sustainable development. The policy should not, however, seek to overly restrict and control development proposals.	Comment noted. There is no change proposed to the overall policy approach, the policy is considered to be sound and compliant with the national planning policy and in general conformity with the London Plan.
PRN.015	R19.0121	C181	Section 6	Policy BN.17 (formerly BN.16)	Bellway Homes (Thames Gateway)	Supports the conservation and enhancement of the historic environment but wishes to see excessively detailed or inflexible policies concerning the protection of individual buildings or groups of buildings avoided. Considers that the policy should be amended to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and that development proposals should be individually	Comment noted. It is not considered that the proposed revised policy changes the existing policy approach within the Adopted Local Plan to development within /adjacent to conservation areas or affecting heritage assets. Rather, it highlights locally specific considerations relevant the context of the area. It is not considered that the policy contains any element that prevents the appropriate introduction of contemporary architecture within

						assessed in terms of their townscape merits. Flexibility should be built into this policy to ensure that design proposals are able to respond to their unique settings.	these settings.
PRN.015	R19.0116	no change proposed	Section 5	Policy CI.1	Bellway Homes (Thames Gateway)	Expresses concern around viability and that policy CI.1 should be flexible to ensure that it does not affect the viability of schemes and therefore delivery of community infrastructure.	Comment noted. No change has been proposed to this policy and site allocations are clear where specific community and other infrastructure will be required as part of development. No change has been considered necessary to achieve conformity with national planning policy or the London Plan and no evidence has been available that would suggest that the policy required updating. The Revised Local Plan also enables the wider viability of schemes to be taken into account in the context of its policies. The Adopted Local Plan was subject to policy viability testing and this has also been carried out in the context of the Revised Local Plan.
PRN.015	R19.0117	no change proposed	Section 5	Policy CI.2	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0108	C71	Section 5	Policy H.1	Bellway Homes (Thames Gateway)	Provision of family units across all tenures not appropriate and will not meet objectively assessed need. Support Build to Rent as a means of achieving flexible tenancies and	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and strikes an appropriate balance between local

						managed approach to development. Support tools such as PTAL mapping to identify locations for yielding additional housing capacity. Policy should be reworded to reflect needs for smaller dwellings as identified in the Housing Requirements Study to be effective.	and strategic requirements.
PRN.015	R19.0109	C84	Section 5	Policy H.2	Bellway Homes (Thames Gateway)	Appreciate need to provide a range of tenures however the split does not take account of site specific circumstances and ability of sites to deliver affordable housing. The tenure split should be subject to viability to be deliverable. Strongly object to inclusion of viability reappraisals in introductory Para. HCA guidance suggests that review mechanisms should only be appropriate on large multi-phased schemes. Where commencement to take place over agreed timescales reviews should not be necessary so policy should reflect this. Policy should take account of individual development sites, tenure split should be subject to viability and should remove reference to viability reappraisal.	The approach to viability and the viability thresholds are in accordance with the draft New London Plan and the Affordable Housing and Viability SPG. This means that schemes providing 35% or 50% affordable housing at the relevant tenure split can go down the Fast Track Route, otherwise the Viability Tested Route will apply. This does not prevent individual scheme proposals for individual sites being taken into account on a case by case basis as schemes come forward over time.
PRN.015	R19.0110		Section 5	Policy H.3	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0111		Section 5	Policy H.4	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0112		Section 5	Policy H.5	Bellway Homes	No comments.	Noted.

					(Thames Gateway)		
PRN.015	R19.0113		Section 5	Policy H.6	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0114		Section 5	Policy H.7	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0115		Section 5	Policy H.8	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0123	no change proposed	Section 8	Policy S.3	Bellway Homes (Thames Gateway)	Highlights concerns around requirements in relation to new energy infrastructure and scheme viability. Suggests additional wording that states requirements should be applicable 'where feasible and viable'.	Comment noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.015	R19.0098	C11	Section 3	Policy SD1: Sustainable Development	Bellway Homes (Thames Gateway)	Supports the principle of delivering sustainable development in accordance with the NPPF to bring about the LLDC's vision for the area.	Support noted.

PRN.015	R19.0099	no change proposed	Section 4	Policy SP.1	Bellway Homes (Thames Gateway)	Support principle of strong and diverse economy to transform east London however it is important that the objectives of local plan remain deliverable and should not be too onerous prohibiting new buildings in sustainable locations.	Noted
PRN.015	R19.0107	C64	Section 5	Policy SP.2	Bellway Homes (Thames Gateway)	Support maximising opportunities for delivering housing in neighbourhoods and reference to exceeding housing targets of London Plan. Para 59 of NPPF states objective of significantly boosting supply of homes and policy should encourage in appropriate locations. NPPF requires a five year supply of housing plus a 5% buffer. Housing Delivery Test indicates that if delivery substantially below over previous 3 years a 20% buffer should be applied. At para 5.3 it is stated that the housing trajectory includes a 5% buffer but this is questioned given that delivery cannot be met beyond 2028/9. The assessment of the past performance of the boroughs should also form part of the LLDC evidence base for its housing targets. All four boroughs have a poor delivery record and note that LLDC only managed to deliver 51% of the target in 2017 therefore the housing target should be increased. Should also be amended to state that family housing is not required over all tenures.	The housing target is set by the GLA in the Mayor's draft New London Plan which has be subject to a rigorous evidence-based approach used across London. It would therefore not be appropriate to develop new local-criteria for establishing a target.

PRN.015	R19.0118	no change proposed	Section 6	Policy SP.3	Bellway Homes (Thames Gateway)	Identifies that has no comments to Policy SP.3.	Noted.
PRN.015	R19.0122	C185	Section 7	Policy SP.4	Bellway Homes (Thames Gateway)	Sets out that the policy should include greater flexibility in relation to scheme viability.	Comment noted, policy SP.4 does include the provision for 'Where appropriate and lawful, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations.' However this is not prescriptive and is on a site by site basis, therefore it is not considered that there is a need for wording in relation to viability.
PRN.015	R19.0097	C6	Section 3	Purpose	Bellway Homes (Thames Gateway)	Considers that it is not clear if the listing of the objectives for the LLDC area is ranked in order of priority or importance; nevertheless, we would not expect the ordering of the objectives to preclude the focus on the delivery of new housing, and to exceeding the minimum housing targets across the area, as intended by the NPPF.	As with the Adopted Local Plan, there is no specified ranking applied to the order of the Objectives within the draft Revised Local Plan. While minor amendments have been proposed to both Objective 1 and Objective 5, overall these remain unchanged and in the same order as previously listed.
PRN.015	R19.0126	C314	Sub Area 4	SA4.3	Bellway Homes (Thames Gateway)	Sets out Bellway's currently position and interests in the area. Supports the LLDC's continued view that Sub-Area 4 as an opportunity for extensive and comprehensive development, and that Pudding Mill under Policy SA4.3 remains a focus for new residential-led development. Have concerns in relation	The site allocation has not been substantively changed from that within the Adopted Local Plan and this has been supplemented by the adopted Pudding Mill SPD (2017). The site allocation text is clear that 25% non-residential floorspace is a target across the site allocation as a

					<p>to principle of 25% Non-Residential Floorspace in the area, supportive in approach in relation to the wider area, however ask for clarification in the supporting text to show how the LLDC will approach this is in decision making terms to ensure that sites coming forward are not overly burdened by under delivery on other sites on Pudding Mill. The threshold does not reflect the multiple competing inputs which need to be considered in development viability, such as demolition, extensive remediation costs, construction costs, community infrastructure levy and affordable housing delivery. Reference to being “subject to viability” should be incorporated and the allocation or the supporting text should clarify that the non-residential floorspace could comprise a range of infrastructure and employment uses in Class A, the full range of Class B uses, Class D and Sui Generis uses. The Employment Land Review prepared as part of the evidence base considers Pudding Mill as a suitable location for Higher Education, and Research and Development, this is not reflected in the site allocation but is reflected in draft Policy B.6 and Objective 1 of the emerging Local Plan. Bellway remain opposed to austere</p>	<p>whole, providing flexibility as to the appropriate level of provision on particular sites. The SPD provides further guidance on this. It is considered that this approach continues to be relevant and supported by the evidence while remaining sufficiently flexible in respect of the development of specific development proposals.</p>
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						<p>positioning of non-residential uses to a central east-west street across the Pudding Mill allocation. In addition due consideration needs to be afforded to the relationship of non-residential uses with residential from an amenity perspective, non-residential uses should be encouraged along the waterways, along Cooks Road and at key nodes to encourage activity and animation. Support co-location and Intensification of Industrial Floorspace to West of Cooks Road and the amendments to the OIL within the site allocation, specifically support the change in direction to allow co-location of B1c/B2/B8 with residential. This will allow an appropriate transition between the adjoining sites to the east of Cooks Road and the OIL. In addition, the re-wording will ensure that matters such as future residential amenity will be considered in more detail by future developers when designing proposals. Challenges the Legacy Corporation's record on housing delivery and asks for clarification around the portfolio approach to housing.</p>	
PRN.015	R19.0120		Sub Area 4	SA4.3	Bellway Homes (Thames Gateway)	<p>Welcomes the removal of the 21-meter height limit at Pudding Mill and makes the case for tall buildings on the site, sighting approval of a building close to</p>	<p>Comment noted. The 21-meter expected height for Pudding Mill has not been removed and continues to be included in section 13, Table 13.</p>

						the Bellway site at up to 30 meters and other tall buildings along Stratford High Street.	The Legacy Corporation's policy in relation to building heights is set out in policy BN.5.
PRN.015	R19.0124	no change proposed	Sub Area 4	Vision	Bellway Homes (Thames Gateway)	Support the recognition of Pudding Mill as an opportunity for mixed use development and development in the area and would like to see development come forward earlier as a catalyst for future further development and investment. Development should not be held back by 'prescriptive timescales set by planning policy but should be market-driven with appropriate phasing and delivery'. Quote how the vision reflects the character on the area. Emphasis that it is important to treat each site individually on its merits.	Comment noted. The support for development in Pudding Mill is welcomed and the site allocation has been developed to support and enable development in Pudding Mill. Legacy Corporation planning policies are in place to ensure development is appropriate and provides for the needs in the area and are based upon a robust evidence base.

PRN.016	R19.0128	C20	Section 4	Objective 1	University College London (UCL)	On behalf of UCL welcome the opportunity to provide comments. UCL is leading university and provides leadership in teaching and research and is ranked among the top universities. It competes on a global scale attracting brightest students. It is essential for world class facilities. A new campus within Queen Elizabeth Olympic Park will be a new model for the community providing world-leading research and education. UCL is working in partnership with LLDC on this which is expected to have up to 4,000 students and 260 academic staff alongside other uses. Provision of teaching and research space are essential components of the ability to attract high quality students and staff as student choices are driven by wider 'experience' of which quality of learning and living accommodation are key. With this in mind UCL has strong interest in planning policy documents. UCL supports change to C20 to highlight promotion of high quality education opportunities.	Noted
PRN.016	R19.0129	C299	Sub Area 3	SA3.3	University College London (UCL)	Support for change to SA3.3 to reflect the UCL East approval. Existing policies and supporting Paras are appropriate and support UCLs global status as leading higher education facility with renewed cultural focus.	Noted
PRN.017	R19.0130	C301	Sub Area 3	SA3.4	Owners/stakeho	Response concerns change 301 for the	Noted

					lders in Greater Carpenters Neighbourhood Area	area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.018	R19.0131	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.019	R19.0132	C301	Sub Area 3	SA3.4	Owners/stakeholders	Response concerns change 301 for the area. This states that the site allocation	Noted

					in Greater Carpenters Neighbourhood Area	is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.020	R19.0133	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.021	R19.0134	C301	Sub Area 3	SA3.4	Personal response as a resident of	Concern about the 2300 gross homes requirement which is too many for area to absorb without drastic change which	Noted

					the Greater Carpenters District.	would impact on residents. It is unlikely this can be achieved without substantial demolition of homes which residents are anxious to preserve. Understand pressures for homes but believe that preservation of the local community, safeguarding rights of leaseholders and preserving social housing requires that the number of new builds is limited to what is compatible with existing homes. Hope it will be possible to facilitate new homes requirement while preserving existing homes and communities.	
PRN.022	R19.0135	C301	Sub Area 3	SA3.4	The Greater Carpenters Neighbourhood Forum	In relation to the supporting development principle setting out need to yield 2300 gross homes with 35% or 50% affordable housing threshold the Forum has always accepted urgent need for more housing in London and understand what area is seen suitable for large numbers of new build. The Neighbourhood Plan provides 500 homes on 5 sites suitable for infill. Do not accept a minimum of 2300 gross homes for the area which would necessitate demolition. Forum can foresee a possibility of more than 500 new builds, subject to consultation of residents and stakeholders subject to the identification of an additional site the triangle owned by TfL adjacent to Stratford station. Would accept additional new builds only to limit what	It is acknowledged that the introduction of a specific housing delivery target for the area will have implications for the work on the Neighbourhood Plan. The Legacy Corporation will continue to provide support to the Neighbourhood Forum with respect to the preparation of the Neighbourhood Plan. It is considered that 2300 new homes (gross) is achievable given the site specific circumstances.

					<p>is possible by developing on the five identified sites within the area plus that owner by TfL which could be suitable for high rise development being part of the town centre, plus any other site which may be identified by the Forum for infill. The Forum, emphasise the highest priority for preserving and where appropriate refurbishing the homes on Carpenters Estate.</p> <p>Forum appreciates importance of Neighbourhood Plan in fitting with local planning policy however the proposed change drastically alters the boundaries within which the Forum has been working over several years in the neighbourhood planning process. It is not clear how the 2300 has been calculated and would like more explanation of this.</p> <p>Regarding the affordable housing threshold of 35% or 50% on public land the Forum welcomes this over previous proposals made for the estate. Would like assurance that a large proportion would be social housing and for genuine affordable rent. Understand that new build needs to be provide sale to help fund development but would like assurance that genuinely affordable and social homes are not reduced under pressure from developers at a later</p>	
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					<p>stage as often happens in London. Reject a net loss of social housing and want to have social housing preserved in preference to new build as average rents for new build are higher and sizes smaller.</p> <p>In relation to requirement for development densities to reflect location and public transport accessibility and town centre boundary the Forum accepts change regarding the town centre boundary. However are concerned that good transport links are used as argument to squeeze undue number of new homes in area. Stratford is already overcrowded at peak times and need to see evidence supporting claims of under-utilised transport capacity.</p> <p>In relation to BN.5 directing taller buildings towards the town centre boundary there should also be possibility of tall buildings along railway line and where already exist.</p> <p>Regarding the retention of existing low-rise family housing where it does not prevent wider regeneration objectives the Forum welcome recognition of family housing as a valuable asset on the estate which is becoming rarer in</p>	
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						<p>London. Would prefer this is given priority not lower than the wider regeneration objective so should reword to: “Prioritise retention of existing low-rise family housing as this has intrinsic value in creating a human-scale environment, taking due account of the achievement of wider regeneration objectives.”</p> <p>Relating to early community consultation where proposals or plans are brought forward should take account of the Good Practice Guide for Estate Regeneration including residents’ ballots the Forum is unhappy that they should merely ‘take account of’ and advocate changed phrase as “and follow the requirements of the Good Practice Guide....”.</p> <p>Forum welcomes explicit reference to its role in trying to ensure plan for future of Greater Carpenters Neighbourhood area which will service the entire community and recognises rights for all. Are keen to work with LLDC and Council we would welcome insertion in Local Plan that new targets lead to effective destruction of local community and existing homes.</p>	
PRN.023	R19.0136	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300	Noted

					Carpenters Neighbourhood Area	homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.024	R19.0137	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so. Reject that previously there was no need for such figures in the GCNF area and we definitely see this as against the mandate of our consultation with the	Noted

						community and our plan.	
PRN.025	R19.0146		Section 5		London Borough of Hackney	Supportive of housing policies. LLDC to deliver excess of the 2161 pa target. Of this 162 will be in LB Hackney.	Noted.
PRN.025	R19.0150		Section 6		London Borough of Hackney	Welcomes the emphasis on public realm. Hackney's Proposed Submission Local Plan (LP33) has a specific policy on improving public realm. In order for consistency in relation to the treatment of the public realm surrounding canals, officers would like to see the LLDC include a specific policy which prevents overshadowing of canals and waterways in line with LP33.	<p>Comment noted. It is considered that the provisions of policies within the Revised Local Plan are adequate to ensure that the potential effects of overshadowing of waterways and canals are identified and mitigated, in particular the provisions within Policy BN.3 Maximising Biodiversity and BN.4 Designing Development. In the event that a direct reference was considered necessary to make the approach in the Revised Local Plan sound, it is suggested that a modification M4 could be made to Policy BN.4 (7) to include a reference to waterways and canals. This would then read as follows:</p> <p>M4: "7. Ensuring surrounding open spaces, <u>including waterways and canals</u>, receive adequate levels of daylight and sunlight."</p>
PRN.025	R19.0153		Section 7		London Borough of Hackney	Supports improvements to access at Stratford International station.	Comment noted
PRN.025	R19.0154		Section 8		London Borough of Hackney	Supports policies in Section 8 and highlights the Carbon Offset SPD as being particularly useful.	Comment noted

PRN.025	R19.0155		Evidence Base	Flood Risk Assessment	London Borough of Hackney	Thanks the LLDC for sharing Flood Risk Assessment Work undertaken in the Hackney Wick area.	Comment Noted
PRN.025	R19.0138		Section 1	Introduction	London Borough of Hackney	It is recommended that further wording in relation to role and lifespan of the LLDC (and the eventual return of powers back to boroughs) is included in the introduction.	Currently the introduction at Section 1 of the draft Revised Local Plan includes Paras 1.3 and 1.4 which set out information about the Regulations 18 and 19 stage consultation. Once adopted, the final draft of the Revised Local Plan would need to include the replacement of these Paras with text explaining how and when it had been adopted. It is considered appropriate to include minor explanatory text within this that would highlighting that the role of the Legacy Corporation is not a permanent one and that planning powers will at a future point return to the four boroughs. This text would likely be along on the following lines as modification reference M2: " <u>The Legacy Corporation as Local Planning Authority is a limited lifespan authority. This Local Plan is the adopted development plan for the purpose of all planning decisions within the Legacy Corporation area until such time as planning powers are returned to the Four Boroughs, and beyond that until such time as it is superseded by revisions to the</u>

							<u>relevant borough local plans that reincorporate their part of the Legacy Corporation area within those plans</u> ". As this text would be a minor modification to the Revised Local Plan, the final form of this section of text will be confirmed at the time to ensure that it reflects any up to date information on the process and timings around this matter.
PRN.025	R19.0143	C45	Section 4	Para 4.24	London Borough of Hackney	Promotion of Agent of Change principle at para 4.22 is supported.	Noted
PRN.025	R19.0144	C47	Section 4	Para 4.26	London Borough of Hackney	Restricting A5 uses to outside 400m walking distances from schools is supported and is line with Hackney's approach. This should also take account of schools across borders.	Noted
PRN.025	R19.0140	C22	Section 4	Para 4.8	London Borough of Hackney	Promotion of creative, production and cultural industries through Creative Enterprise Zone at Hackney Wick and Fish Island is supported.	Noted
PRN.025	R19.0152	C192	Section 7	Para 7.8	London Borough of Hackney	Welcome reference to potential Eastern branch of Crossrail 2.	Comment noted.

PRN.025	R19.0141	C26	Section 4	Policy B.1	London Borough of Hackney	Support for directing large scale offices to Stratford however would like some reassurance that removal of impacts test for offices in excess of 2500 outside would not have negative impacts on other centres. Hackney supports enhanced protection of industrial uses which is in line with Hackney's approach and London Plan's 'retain capacity' of industrial land. It is noted that intensification, consolidation and co-location of industrial is permitted in employment clusters in Table 2. Hackney is proposing similar approach in Priority Industrial Areas in LP33.	The sequential assessment of sites approach set out in criterion 1 directs large-scale office uses to the Metropolitan Centre therefore it is not anticipated that there would be any significant implications of the removal of the impacts test. Should any proposal for major office proposals come forward outside the Metropolitan Centre the Legacy Corporation will continue to work with the boroughs in appropriately assessing the proposal including impacts on the relevant centre hierarchies.
PRN.025	R19.0142	C41	Section 4	Policy B.2	London Borough of Hackney	Positive promotion of residential uses in town centres is supported in line with Hackney approach. Hackney is promoting mixed used development including residential (not on ground floor) in centres.	Noted

PRN.025	R19.0145	C56	Section 4	Policy B.4	London Borough of Hackney	Support policy principle which encourages provision of low cost workspace but could require rather than encourage this within new major schemes and state sought proportions and circumstances. Policy could reflect approach in Hackney Wick Masterplan. Hackney requires proportion of affordable workspace in new commercial development at discount rate. Hackney has commissioned study to look at the economic and social value of town centres and designated employment area which is to include assessment of the economy focussing on its places, sectors, workspaces, mapping of sectors to understand characteristics, needs and opportunities as well as value provided to borough. This will support Hackney's affordable workspace policies and may be useful to LLDC and supplementary guidance. Joint work on the Hackney Wick and Fish Island CEZ bid may also provide useful evidence for both authorities in terms of the workspace requirements of cultural and creative businesses. It is useful that the LLDC policy refers to relevant borough's registered workspace providers.	Noted.
PRN.025	R19.0151	C147	Section 6	Policy BN.3	London Borough of Hackney	Considers it important that open space and biodiversity policies align across borough boundaries. Supports LLDC's	Comment noted.

						ambition to achieve a net gain in biodiversity as well as the promotion of the Urban Greening Factor in line with the London Plan; these are both concepts that will be introduced in LB Hackney Policy LP33.	
PRN.025	R19.0147	C84	Section 5	Policy H.2	London Borough of Hackney	Affordable housing approach differs to that of Hackney where 50% (split 60:40 social intermediate) is achievable on schemes of 10 units and above. Cash in lieu below 10 units is also achievable. This reflected in LP33 Proposed Submission and particularly important in Hackney where around half of capacity comes from small sites.	Noted.
PRN.025	R19.0148	C104	Section 5	Policy H.5	London Borough of Hackney	Strong support for continued allocation of the Bartrip Street site allocation for gypsy and traveller accommodation to meet need within Hackney. Support commitment to working with boroughs and partners to explore opportunities to meet need. Could specifically mention a regional approach in this matter.	Noted. The commitment from the Adopted Local Plan with respect to working with boroughs and other stakeholders remains.
PRN.025	R19.0149	C111	Section 5	Policy H.7	London Borough of Hackney	Hackney's approach prioritises C3 over other forms of residential due to the significant need for genuinely affordable self contained housing with potential flexibility to provide a range of needs. Purpose built student housing, visitor accommodation and shared housing compete directly for land supply with conventional self-contained	Noted.

						housing. Council therefore prioritises C3 over these uses.	
PRN.025	R19.0139	C8	Section 2	Vision and objectives	London Borough of Hackney	Reference throughout to 'creative enterprise zone in Hackney Wick and Fish Island' is supported.	Comment noted.
PRN.026	R19.0156	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.027	R19.0157	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with	Noted

						leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.028	R19.0158	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.029	R19.0159	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have	Noted

						been fighting for the community for decades to prevent such change and continue to do so.	
PRN.030	R19.0161		Section 5		Home Builders Federation (HBF)	<p>Local Plan is unsound as it is not positive prepared and ineffective. There is inadequate information on housing land supply. At para 5.3 the LLDC state that it is unable to identify an adequate land supply for the period from 2028/29 and it is unclear what the land supply actually is for period 2020/21-2028/29. The Sites Report 2018 identifies several sites some allocated some not. It does not include a breakdown of estimated site yields and trajectory for delivery of allocated sites. Without this information it is hard for third parties to scrutinise the housing land supply. This is central to soundness of local plan and have been unable to locate a five year housing land assessment detailing the sites that contribute to it.</p> <p>LLDC cannot rely on the GLA SHLAA as evidence for housing land supply because as identified in this document at Para 1.5 the SHLAA cannot allocate sites. It only identifies a notional capacity for each local authority planning area and it is the responsibility of each local authority to undertake detailed local assessments and allocate sites. Therefore sites should be</p>	There is no specific requirement to provide annual delivery information for each identified site within the Revised Local Plan. Instead, in combination the Revised Local Plan provides a housing trajectory and the Sites Report provides information for allocated sites. The housing trajectory includes anticipated capacity from other sites in addition to the allocations and further information and explanation is provided within the Housing Delivery Explanatory Note (2019). This will include further information on which sites have planning permission and when it was received. In relation to the small sites figure this has not been included within the first 5 years but there are measures within the Revised Local Plan to review progress on this. The Housing Background Paper (2018) sets out at Para 5.4 how the NPPF requirement to identify small sites for 10% of housing delivery has been met.

					<p>allocated to deliver 21610 homes over 10 years. Noted in the Housing Background Paper this includes information on capacity of key sites but does not breakdown what has been delivered and what completions are expected over the plan period. This should be included in a trajectory plan for each site by year and key site.</p> <p>The figures for the key sites are indicative and actual rate they will be built out will be for discussion with landowners and developers concerned. LLDC should explain planning status of its allocations including whether it has full permission and date received. Appendix 2 includes sites but we are confused about the pre-adoption period of 2018/19 as this is not part of planning period and should not be counted towards the target. This also breaks down delivery into 5 year blocks, while helpful this should also be broken down by each identified and allocated site by each year. This should also be totalled with small sites assumptions so it makes the total of 21610 completions by the end of the plan period.</p> <p>HBF has strong reservations about the small sites component of the draft New</p>	
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						<p>London Plan as it lacks credibility. This modelled a theoretical capacity of circa 18790 net additions per year but trends from small sites yield much less than this just 12940 on a average for 12 years. Mayor has also added a separate windfall allowance but HBF argue this has already been counted as part of the 12 year trend. This will be one of the key areas of conflict in the London Plan EIP. Although this generates a low figure for the LLDC at 80 dwellings per annum the effectiveness of policy H.2 will need monitoring. If these do not materialise in the first 2 years of the London Plan and Revised Local Plan it will be necessary to undertake an urgent review of strategic and local plans. It is noted small sites assumptions have only been factored in for years 6-10, this seems sensible to allow the approach to 'bed-in'. We note the additional capacity category in the Background Paper which has potential to yield 2036 homes based on the characterisation study undertaken by LLDC and broad locations to yield residential capacity from small sites. Instead of hoping these materialise they should identify specific sites and allocate them.</p>	
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					<p>The NPPF requires local authorities to identify small sites no larger than 1ha to accommodate 10% of the housing requirement (LLDC=2161). Mayor small sites equals 800 homes in sites of 0.25ha or less. The LLDC should therefore identify other sites of up to 1ha to meet the requirement for 1361 homes to be met. Rather than relying on the Mayor's theoretical assumptions LLDC should identify small sites for each year of the Revised Local Plan equivalent to 10% of the housing requirement. The Revised Local Plan should be a 10-year plan therefore sites of 0.25ha for 2610 homes should be identified. On this basis the Housing Background Paper has permissions and allocated site to support 20871 homes.</p> <p>LLDC is in a relatively strong position albeit short of the overall requirement, with a shortfall of land for 739 homes. LLDC should identify sites for full requirement to be delivered by 2029/30 and concern that too much reliance is placed on non-identified sites to achieve the target.</p> <p>As plan commenced in 2020 there is no deficit that needs to be factored into</p>	
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						<p>the 5 year land supply calculation therefore the requirement is 10805 (2161 x 5) plus a buffer of 5% for 11345 homes. On basis of information provided in the Background Paper the LLDC has permission, allocations and broad locations for 12067 homes and is able to demonstrate a 5 year land supply, but reservations about the reliability of the 'additional capacity' and whether it will yield the required number of homes. Performance of LLDC against this will need to be closely monitored and there is no information of the sites in question but other parties may have different view on delivery and capacity of sites.</p>	
PRN.030	R19.0162	C90	Section 5	Policy H.3	Home Builders Federation (HBF)	<p>H.3 is unsound and not effective. NPPF gives greater attention to improving supply of older persons accommodation and there is generally a realisation that local planning authorities need to do more to plan positively for needs. Mayor has assessed this across London through his SHMA and has set targets for each LPA bar the MDCs. The Revised Local Plan should do more, LLDC argues that this is not necessary because it mainly caters for young people but provision would provide for mixed and balanced communities. LLDC area lends itself to provision due to excellent public transport infrastructure.</p>	<p>Some minor amendments are proposed to Policy H.3 in response to other representations to clarify which sites are suitable of specialist accommodation. Please see proposed amendment MM23: ... <u>Taking these matters into consideration all site allocations are considered suitable for specialist older persons accommodation.</u></p>

					<p>Welcome the policy but without a target such as in the draft New London Plan the policy is unlikely to be effective.</p> <p>Para 5.26 of the Revised Local Plan places onus on providers to demonstrate need whereas the LLDC should be more proactive in setting indicative requirement based on demographic information. NPPF requires plans to contain clear policies of how decisionmakers should react to proposals (para 16d). As is currently written applicants could not be certain whether a scheme would be supported so would be a discouragement. The level of target is not clear as is not supported by a local SHMA. However GLA SHMA identifies substantial growth in elderly population of London of around 73% by 2041 for over 65s. Table 4.4 of London Plan require 4,115 units of specialist older persons accommodation to be provided each year which equates to 6.5% of overall housing requirement of London, so it is reasonable for LLDC to set up a benchmark target of 5% of its requirement to be for older people which would be 108 units per annum. This benchmark need not be binding but HBF have argued in representations</p>	
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						to draft New London Plan that if it fails to be achieved in 2 years then applications for older person housing submitted will be considered more favourably in subsequent years and benefit from 'presumption in favour of sustainable development'. Policy is unsound as it is not effective.	
PRN.030	R19.0163	C97	Section 5	Policy H.4	Home Builders Federation (HBF)	HBF are alarmed by the extent to which student bedspaces in London have been counted towards housing targets. Population and household projections assume that the institutional population remains constant in GLA SHMA and future student expansion plans are not taking into account the projected growth in the student body. A bedspace should not be considered equivalent to conventional housing supply and the new Draft New London Plan will treat three bedrooms as equivalent to one unit but we remain concerned about the extent this will make up supply in the area. Demand for student accommodation and that of other institutions should be assessed separately from that of C3 housing as Norwich and Canterbury do. Supply of student housing has formed a significant component of housing supply within the area in last few years.	The draft New London Plan specifies that housing need of students is an element of the wider housing requirement. The Housing Requirements Study (2018) also identifies that the needs of non-communal student households are counted as part of the overall OAN, however, a net increase in student bedspaces in specialist accommodation could reduce the demand from student households. The GLA has also assessed demand for student accommodation within its SHMA.
PRN.030	R19.0160	C64	Section 5	Policy SP.2	Home Builders Federation	HBF is principal representative body of the house-building industry of England	The Housing Delivery Explanatory Note (2019) provides some

					<p>(HBF)</p> <p>and Wales and representations reflect view of membership including multi-national companies, regional developers and small local businesses. Members account for 80% of for sale market housing and large proportion of affordable housing. Wish to participate in examination in public. SP.2 is unsound because it does not conform with the draft New London plan in terms of the delivery timetable and it does not identify deliverable housing land supply to sustain housing delivery over the 16 year plan period proposed so not effective and not positively prepared. Note conformity with the New London Plan with respect to emerging 10 year targets of 2161 per annum which is welcomes but have reservations about ability to deliver in full for 2019-2029 as unsupported by robust study identifying deliverable sites for these 10 years and contribution to the 65,000 dwellings per annum.</p> <p>HBF have objected to calculation of OAN for London and consider the calculation too low and the housing land capacity assumptions are flawed so Mayor has overestimated supply in London but matter for the London Plan EIP.</p>	<p>additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan. The Housing Requirements Study (2018) includes a number of different methodologies for assessing OAN for the area, all of which fall well below the annual anticipated housing delivery for the area.</p> <p>Pursuant to Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) all local planning authorities must review their local plans at least once every five years from their adoption date. Accordingly the Revised Local Plan (including its housing target, housing land supply and delivery rates) will be kept under review.</p>
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					<p>Revised Local Plan proposed to cover 2020-2036 but draft New London Plan providing 65,000 homes starting 2019/2020 which implies LLDC not proposing to provide 2161 in 2019/2020 which has implications on soundness if this and other authorities not planning for this and bring forward the housing targets in full by 2028/2029 and will comment on this in London Plan EIP.</p> <p>LLDC local plan should therefore cover 10 years to 2029/30 as Mayor has stated he is unable to identify housing land supply for 2028/2029. LLDC should therefore review plan in 5 years in line with London Plan.</p> <p>Para 5.3 states LLDC expect to deliver 22,000 homes to 2036 and is unclear what annualised target is being used. Should assume that the 2161 applies to 16 years which makes 34,576 homes therefore the 22,000 is capacity driven and should be made clear. However the 65,000 London figure is also capacity constrained so the target is twice constrained.</p> <p>Draft New London plan has been amended to require rolling over of annualised targets when the dates extend beyond that of the London Plan</p>	
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						<p>so the full housing figure should be 34,576 quoted above, but aware Mayor is unable to identify land supply for period beyond 2028/29.</p> <p>To simplify consider the LLDC should conform to London plan and operate over 10-year timescale. If little ability to deliver beyond 2029 should not have a 16-year local plan period so should keep up to date with regular review. So should have 10 years at 2161 per annum making 21610 homes.</p>	
PRN.031	R19.0165		Evidence Base	Flood Risk Assessment	Environment Agency	<p>Sets out that the Revised Local Plan is unsound due to the evidence base not including a SFRA covering the Legacy Corporation Area.</p>	<p>Comment noted. Whilst the Legacy Corporation is the Local Planning Authority for its area, it is not the Local Authority and therefore has relied on the latest SFRA's prepared by the four boroughs, which include their elements of the LLDC area. A Flood Risk Study has been prepared using this evidence and provides updated assessment and information, including sequential and exceptions testing where relevant, for example where new or changed site allocations have been proposed. This is considered to be the most appropriate and proportionate approach.</p> <p>The Legacy Corporation's approach to testing flood risk in the area is</p>

							further set out within a Flood Risk explanatory note.
PRN.031	R19.0168	no change proposed	Section 6	Objective 3	Environment Agency	Point of accuracy and clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0042) related to Objective 3 where a change was sought to include the following point: contribute to meeting the targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD)	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see the response R18.0042 contained within the Consultation Report
PRN.031	R19.0172	C146	Section 6	Para 6.13	Environment Agency	Support to the inclusion of the Thames River Basin Management Plan (TRBMP)	The Legacy Corporation is willing to accept the proposed minor

						<p>and Water Framework Directive in this policy relating to the integration of Sustainable Drainage Systems (SuDS), effective setbacks from watercourses, the naturalisation of the banks and other measures that will improve the management of surface water run-off. Amendment sought to include the following text:</p> <p>"In support of the aims of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive, all developments along the waterways will need to integrate Sustainable Drainage Systems (SuDS), including the use of oil and petrol interceptors, effective setbacks from watercourses, the naturalisation of the banks <u>and green edges to rivers (either in banks or within the concrete channels, when there are developments within the riparian zone)</u>, and other measures that will improve the management of surface water run-off <u>and biodiversity.</u>"</p>	<p>amendment. Please see proposed minor modification MM27 to Para 6.13 by adding the following to the end of the Para:</p> <p>MM27: "In support of the aims of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive, all developments along the waterways will need to integrate Sustainable Drainage Systems (SuDS), including the use of oil and petrol interceptors, effective setbacks from watercourses, the naturalisation of the banks <u>and green edges to rivers (either in banks or within the concrete channels, when there are developments within the riparian zone)</u>, and other measures that will improve the management of surface water run-off <u>and biodiversity.</u>"</p>
PRN.031	R19.0170	no change proposed	Section 6	Para 6.4	Environment Agency	<p>Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0044) related to Para 6.4 where a change was sought to include the following [the change is highlighted in bold]: Regeneration, especially in the places</p>	<p>Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting</p>

						that surround Queen Elizabeth Olympic Park, presents opportunities to maximise green infrastructure by integrating new development with waterways and green space and by protecting, extending and enhancing the existing green infrastructure network, local wildlife corridors and the East London Green Grid, <u>whilst contributing to targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD).</u>	text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see response R18.0043 contained within the Consultation Report.
PRN.031	R19.0175	no change proposed	Section 8	Para 8.12	Environment Agency	Minor modifications recommended for Para 8.12 in order to further highlight the role that climate change will play in changes to London's water resources: 'Part of the wider strategy to help London meet its growing demand for water, resulting from an increase in development and increase in population and climate change, is the need to ensure that this new development is as water efficient as possible and that opportunities are taken to reduce the amount of potable water required. This is particularly the case in the Legacy Corporation area where a significant amount of new development will come forward over the lifetime of the Local Plan and present a new demand for water and a significant opportunity to implement a	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.5 sets out the maximum achievable approach in planning in accordance with the optional buildings regulations requirements. Para is considered to adequately set out the rationale behind the policy. This suggested change is therefore not considered to be necessary in order for the policy or the Revised Local Plan to be sound or compliant with national planning policy or achieve general conformity with the London Plan.

						range of measures that will make that development as water efficient as possible.'	
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PRN.031	R19.0176	no change proposed	Section 8	Para 8.14	Environment Agency	The Environment Agency is supportive of the requirement for developments to consider the capacity of existing infrastructure for water supply and waste and related supporting text. It is then set out that further wording around retrofitting measures within existing buildings in line with BREEAM standards should be included to further enhance requirements in line with the representation's suggested changes to Policy 3.5: Water supply and waste water disposal.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). It is considered the approach in Policy S.5 continues to be sound in applying the maximum optional building regulations requirement of 110 litres per person per day for housing. While the issue raised is noted it would not be considered sound to require more than is required by the building regulations in the case of refurbishment which may in any case fall outside of planning control. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.031	R19.0171	C144	Section 6	Policy BN.1	Environment Agency	It is positive to see the inclusion of providing wildlife corridors in section 4 (Connectivity) of this policy. It is recommended that section 1 (Landscape and water) also includes WFD when mentioning the natural features, and details why reducing water consumption is of critical importance in London development.	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text; managing water use and WFD are in detail referred to in Policy S.5.

						<p>Inclusion of these two aspects would reinforce policy references to both this document and the London Plan. In light of the above, the following change suggested:</p> <p>"1. Landscape and water: relate well to the local area's defining natural and man-made landscape features, in particular the linear form of the waterways and parklands, <u>in line with of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD).</u>"</p>	<p>Policy BN.1 has also been cross-referenced to Policy BN.2 and for the purpose of clarity, it will be ensured that a cross-reference is also made to Policy S.5. It is not considered necessary to repeat the approach set within these policies to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan.</p>
PRN.031	R19.0164	C178	Section 6	Policy BN.14 (formerly BN.13)	Environment Agency	<p>Considers that the policy should include a specific reference to water in the first Para:</p> <p>"To prevent harm to health and the <u>water</u> environment"</p> <p>Considers that while the policy wording is good that strongly recommends more weight is given to the safeguarding of groundwater, not just for drainage. Considers that the policy fails to steer inappropriate development away from areas where the risk to groundwater is high. No reference is made to Source Protection Zones (SPZs). There are a number of SPZs that span the LLDC area and so advises that measures are</p>	<p>The Legacy Corporation does not agree that adding 'water' to the beginning of the policy as suggested would be sound as this would change the overall meaning of the policy. The supporting Para 6.51 makes specific reference to "the water environment and groundwater". It is accepted that the policy would benefit from a reference to source protection zones. However, an alternative approach is suggested in the form of a modification to the policy and a minor modification to Para 6.51 (reasoned Justification).</p> <p>Modification M5 to final Para of Policy BN.14 by adding new point 6:</p>

						<p>outlined that seek to protect these. To achieve this, suggested the following text is necessary to make the policy sound and consistent with national policy:</p> <p>"Certain contaminative developments, processes or land uses proposed within or in close proximity to sensitive locations, including Source Protection Zones, may not be acceptable. Applicants are advised to speak to LLDC's Environmental Health Team and the Environment Agency where required."</p>	<p>M5: <u>"6. Account is taken of any potential impact on any Groundwater Source Protection Zone."</u></p> <p>Minor modification MM29 to Para 6.52 by adding the following to the end of the Para:</p> <p>MM29: <u>"The Legacy Corporation area includes a number of groundwater Source Protection Zones (SPZs) and development having an unacceptable effect on these may be considered unacceptable. It will be important for applicants to discuss ground contamination issues with the relevant borough Environmental Health team where this may be an issue and, where there is potential for an impact on a SPZ, to discuss this with the Environment Agency."</u></p>
PRN.031	R19.0173	C147	Section 6	Policy BN.3	Environment Agency	<p>Whilst it is positive to see the inclusion of supporting measures in line with the Biodiversity Action Plans (BAPs) in this policy section, it should also be stated that this policy would benefit from supporting WFD measures. This policy should outline the need to deliver environmental improvements outlined in the TRBMP, as a critical way of</p>	<p>Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. For the purpose of clarity, it will be ensured that this is cross-</p>

					<p>improving the biodiversity of the riparian and surrounding environment, which could be implemented alongside measures found in the BAPs.</p> <p>Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0049) related to Policy BN.3 where a change was sought to include the following [the change is highlighted in bold]: <u>7. To deliver environmental improvements outlined in the Thames River Basement Management Plan (TRBMP) as a critical way of improving the biodiversity of the riparian and surrounding environment.</u></p>	<p>referenced to Policy BN.3. It is not considered necessary to repeat the approach set within this policy to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see response R18.0049 contained within the Consultation Report.</p>
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PRN.031	R19.0166	C227	Section 8	Policy S.10 (formerly Policy S.8)	Environment Agency	<p>We welcome the change to divide the previously proposed policy (Policy S.8: Flood risk and sustainable drainage measures) to give more weight to Flood Risk (S.10) and Sustainable drainage measures and flood protections (S.11). Regarding the newly formed policy Flood Risk (S:10), we are pleased to see the acknowledgement of flood risk mapping and climate change, and how flood mitigation measures can be included to adapt to climate change. However, we would also like to see a policy prohibiting undercroft flood storage or attenuation tanks, and the promotion of level for level and volume for volume flood storage compensation at all opportunities. A number of recent planning applications (particularly within the Hackney Wick and Fish Island area) have come forward suggesting attenuation tanks as a form of flood storage compensation, which is something we are keen to avoid.</p>	<p>Comment noted, however it is not considered necessary for the policy to be prescriptive in terms of flood risk mitigation measures. Individual development proposals should be assessed and mitigation proposed relevant to the circumstances of each location and development proposal in line with policies S.10 and S.11 and as part of the development management process (in consultation with stakeholders such as the Environment Agency and the boroughs as lead Flood Authority). The Legacy Corporation will continue to work closely with the Environment Agency around flood mitigation in the Legacy Corporation area.</p> <p>However, a minor modification (MM37) is proposed to the end of the supporting text at Para 8.28 to highlight the issues raised in the representation. The proposed minor modification is as follows:</p> <p><u>"Undercroft flood storage and attenuation tanks should be avoided and, wherever possible, level for level and volume for volume flood storage be achieved when designing flood risk mitigation measures for</u></p>
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PRN.031	R19.0167	C228	Section 8	Policy S.11 (formerly Policy S.8)	Environment Agency	<p>Sets out concerns around the soundness of policies S.10 and S.11 due to clarity in wording. Suggest moving final Para of Policy S.11 which deals with flood defences is more relevant for Policy S.10 and flood risk.</p>	<p>With no change in wording or approach to the policy proposed it is agreed that moving the Para would make each policy clearer. A minor modification (MM36) is therefore proposed that would remove the following wording from the end of Policy S.11 and place it at the end of Policy S.10:</p> <p><u>"Where development is proposed on a site that includes an existing flood defence structure, development proposals should be designed to maintain the integrity of existing structure. Where the need for new or improved flood defences have been identified, relevant planning applications should demonstrate that allowance has been made for the relevant works to take place, including sufficient access for construction. Where a development proposal is dependent on the provision, improvement or repair of a river wall or other flood defence structure, these works should be included within the development applied for within the planning application."</u></p>
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PRN.031	R19.0174	no change proposed	Section 8	Policy S.5	Environment Agency	The representation is positive around the inclusion of policy around water supply and waste water disposal. Sets out that retrofitting should be referenced as part of Policy S.5. This representation also further sets out that BREEAM standards should be included within the policy to further enhance it and that wording should be strengthened around adhering to London Plan requirements.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). In addition, the requirements in the policy are in line with national standards. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.031	R19.0169	no change proposed	Section 6	Policy SP.3	Environment Agency	Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0043) related to Policy SP.3 where a change was sought to include the following point: Contributes to meeting the targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD)	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see response R18.0043 contained within the Consultation Report.
PRN.032	R19.0177	N/A	General Comments	General	London Borough of Waltham Forest	The Council welcomes the opportunity to work collaboratively with neighbouring boroughs to ensure that	Comments noted. With respect to the Epping Forest SAC it is noted that Epping Forest Council proposes a

						<p>strategic matters are coordinated across borough boundaries.</p> <p>Officers have attended meetings with particular reference to infrastructure, housing, employment and the environment and have further reviewed the papers sent to us on 16th October in relation to our Statement of Common Ground. Given our attendance there are no further comments we would wish to make on general matters beyond the assumption that matters relating to the Epping Forest SAC have been acknowledged to the satisfaction of Natural England.</p>	<p>3km inner zone of influence within which contributions will be sought as mitigation for management of visitor pressures. A 6.2 km zone of influence accounting for 75% of visitors (which includes an element of the LLDC area) has been identified but there are no plans to seek mitigation outside of the 3km zone. The Natural England response to the LLDC Local Plan Regulation 19 Draft Revised Local Plan raises no issues in relation to this or other matters.</p>
PRN.033	R19.0179	C261	Sub Area 2	Area Profile	London and Continental Railways (LCR)	<p>Recognition should be given to the fact that Zones 1, 2 and 4 of Chobham Farm have detailed planning consent and have been or are currently being built out. In addition, recognition should be given to later phases of the scheme coming forward and contributing to the new vibrant neighbourhood being developed in North Stratford. In order to meet the test of soundness (justified) the text should be amended to state "The Chobham Farm development, providing new homes, open space and local retail use, is equally well underway. The first phase is completed and occupied and Zones 2 and 4 are currently under construction with Zone</p>	<p>Change reference number C261 already provides information on the development progress of this Site Allocation. However, the Legacy Corporation is willing to make a correction, for clarity purposes, to the proposed change.</p> <p>A minor modification to the text is proposed as follows:</p> <p>MM39: The Chobham Farm development, providing new homes, open space and local retail use, is equally well underway, phase one <u>Zone one</u> is completed with zone <u>Zones two and four</u> being currently</p>

						4 due to be completed in 2019 and Zone 2 in 2020. London and Continental Railways is also seeking to bring forward part of Zone 3"	under construction, and the central section Zone 3 <u>is</u> yet to come forward.
PRN.033	R19.0180	C266	Sub Area 2	Figure 34	London and Continental Railways (LCR)	LCR supports the amendment to Figure 34 to include the Chobham Farm North site and the inclusion of a connection along Leyton Road and through the site to link the site to areas to the north and south.	Support noted.
PRN.033	R19.0182	C274	Sub Area 2	SA.2.1	London and Continental Railways (LCR)	London and Continental Railways supports site allocation SA2.1 for Chobham Farm for the comprehensive, phased, family-focused, medium density mixed tenure residential development with ancillary non-residential space and local open space. The supporting development principles should give account to the approved parameter plans (PP001 Rev L Zonal Boundaries; PP002 Rev J Maximum Plot Areas; PP003 Rev L Public Realm, Access & Amenity; and PP004 Rev L Maximum Height Parameters) which set out the indicative location, layout and height of development blocks coming forward within the site allocation.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.033	R19.0183	C277	Sub Area 2	SA2.4	London and Continental Railways (LCR)	Support to the proposed development principles for site SA2.4. Suggestion that 3rd development principle should give account to the Leyton Road Study, approved as part of the Chobham farm planning permission.	Support for principles noted. However, the suggested changes are not considered necessary to make the site allocation sound. In relation to Point 3 it is not considered necessary to include the level of

					<p>Point 4 should give consideration to the scale of other developments coming forward in the area.</p> <p>Further point should be added to reflect opportunity to create a link northward and to the wider Leyton neighbourhood and this reflected in figure 34.</p> <p>Recognition should be added to the fact that any private land within the site allocation would be expected to provide 35% affordable housing.</p> <p>Clarification sought to which non-residential uses would be appropriate within this site allocation.</p> <p>The relevant planning history should refer to the western part of the site being part of the hybrid planning permission (Zone 5), not the eastern part.</p>	<p>detail suggested in terms of reference to the Leyton Road Study. Existing Policy 2.2 Leyton Road - improving the public realm is considered to provide an appropriate level of context and approach.</p> <p>Point 4: the principle of a stepped approach is considered to be appropriate and supported by the wider principles of addressing the lower rise existing communities to the north and east. It would be expected that any proposals above the 20m threshold height would be tested against Policy BN.5 (previously Policy BN.10)</p> <p>Link northward and Figure 34: it is not considered necessary to add a written point here as the site allocation map shows the principle of this route and this is also already shown on Figure 34.</p> <p>Affordable Housing Threshold. The 50% threshold is considered appropriate for this site as it is also known to be owned by a mixture of public authorities and entities that are publicly owned. This is consistent with the approach within Policy H2</p>
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						<p>of the Revised Local Plan and that in the draft New London Plan. Affordable housing delivery for all development proposals will be assessed against Revised Local Plan policies SP.2 and H.2 that set out the targets and triggers for the affordable housing delivery, both across the LLDC area and on publicly owned land.</p> <p>Clarity on non-residential uses: it is considered that the current wording of the site allocation provides sufficient guidance to determine the balance of uses between residential and other uses by identifying a minimum number of residential units. In terms of the type of non-residential uses that would be appropriate, Policy is considered to provide sufficient guidance on the approach of the amount of employment floorspace that should be included while maintaining flexibility in terms of the format and potential end-users. The Legacy Corporation is willing to make an amendment, for clarity purposes, to SA2.4 to include reference to Policy B.1.</p> <p>A minor modification is proposed as</p>
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							<p>follows:</p> <p>MM41: Additional Development Principle – <u>“The amount and type of non-residential use should be determined by applying Policy B.1.”</u></p> <p>The suggested minor modification to the Planning History is noted and accepted as follows:</p> <p>MM42: 12/00146/FUM – the eastern <u>western</u> part of the site...</p>
PRN.033	R19.0184	C277	Sub Area 2	SA2.4	London and Continental Railways (LCR)	In order to meet the test of soundness (positively prepared and justified) and to reflect the Vision and objectives for sub area 2, the site allocation should include the whole of LCR' s land which was previously included as Zone 5 of the Chobham Farm development and already has extant permission for 2,000 sqm of B1/ A2 uses, in accordance with the planning permission and approved parameter plans for Chobham Farm.	<p>The Legacy Corporation is willing to accept the proposed modification.</p> <p>Please see proposed modification M6 which shows the inclusion of the land between the railway and the existing warehouse and community building that will remain outside of the site allocation.</p>
PRN.033	R19.0181	C273	Sub Area 2	Table 11	London and Continental Railways (LCR)	London and Continental Railways considers that the prevailing heights for both Site allocation SA2.1 and SA2.4 should reflect the approved parameter plan for Chobham Farm and the scale and height of existing and emerging development within the immediate area which is up to 10 storeys. It should also reflect recent planning guidance in	<p>The proposed changes are noted. However, the proposed change to amend the prevailing height for site Allocation SA2.1 does not relate to a change proposed to the Adopted Local Plan as identified in the ‘Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The</p>

						<p>the NPPF and draft London Plan on optimising development, whilst promoting high quality developments. Table 11 should be amended to state: Chobham Farm 30 metres Chobham Farm North 25 metres</p>	<p>suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. The prevailing heights identified in Table 11 in this section of the Revised Local Plan have remain unchanged and are intended to act as the threshold height above which the tests in Policy BN.5 Proposals for Tall Buildings (previously Policy BN.10) will be applied when considering development proposals. The outline permission for the Chobham Farm development was in place at the time the Adopted Local Plan was developed and adopted and so the unchanged approach here continues to be considered as appropriate and sound.</p>
PRN.033	R19.0178	C260	Sub Area 2	Vision	London and Continental Railways (LCR)	<p>Support to the proposed minor amendments to Vision and Area profile and to proposed site allocations SA2.1 Chobham Farm and SA2.4 Chobham Farm North. To meet the soundness test (justified), this Vision to encourage a thriving neighbourhood and to promote residential use should be reflected in support for additional housing on new sites coming forward for the area and in the site allocations</p>	<p>Comments noted. The Vision to create a family focused, thriving community has been reflected in all Sub Area 2 site allocations. All three site allocations within the Adopted Local Plan have permission in outline and most of the sites have already been delivered, are under construction or benefit from detailed planning permission. Monitoring has shown that developments that are</p>

						within Sub Area 2, including Site Allocation SA2.4: Chobham Farm North.	coming forward from these site allocations contribute significantly toward achieving this vision. The same principles have been applied to the new Site Allocation SA2.4 Chobham Farm North. The site allocation recognises the opportunity for a continuation of the character and a provision of land mixed-uses, including family housing.
PRN.034	R19.0203	n/a	IDP		Canal & River Trust	Acknowledges the role and importance of the IDP and welcomes the inclusion of several improvements relating to the trust's waterways, suggests additional projects to add to the IDP project list.	The IDP and related project list are currently in draft form and are reviewed on a regular basis in order to capture the most up to date information, needs and proposed projects in the Legacy Corporation area. This suggested addition is noted and the list of projects will be reviewed in light of this.
PRN.034	R19.0185	N/A	General Comments	General	Canal & River Trust	The Trust continues to welcome the LLDC's recognition of the importance of the area's waterways to its character, function and attractiveness as a place to live, work and visit. We agree with the LLDC that the continued enhancement of the waterways represents an important opportunity (para 2.6). Appropriate development alongside our network is key to ensuring that local distinctiveness is maintained. This includes ensuring that landscaping reflects the industrial heritage of the	Comments noted. The suggested minor modifications are addressed in the context of specific proposed changes to the Adopted Local Plan elsewhere in this schedule.

						<p>waterways. We, therefore, welcome the ongoing commitment in the same Para to "creating high quality buildings and places, which have inclusive design and maintain and build upon existing local character".</p> <p>We welcome the recognition of the opportunity (in para 2.6) to continue to build on the existing low-carbon, drainage and other infrastructure, including heating and cooling networks. We believe that the Trust's waterways can play an increasingly important role in this. The Trust does not have any fundamental soundness concerns about the revised LLDC Local Plan. Suggests a number of minor modifications.</p>	
PRN.034	R19.0199	C242	Sub Area 1	Para 10.8	Canal & River Trust	<p>Welcomes the recognition in para 10.8 that new bridges that have been delivered or planned over the Lee Navigation mean that it is no longer a significant barrier to movement in the Hackney Wick & Fish Island sub-area. Suggests that para 7.18 should be amended so that it is consistent with this.</p> <p>Also suggests that the map on p180 should show the Hertford Union Canal towpath in this area as a key off road connection to be enhanced. Much of this improvement is to be delivered through the consented Wickside</p>	<p>Comments noted. However Para 10.9 states that "New bridges and underpasses should be delivered to overcome the physical severance imposed by the waterways, railway embankment, A12 carriageway and the industrial sites either side of the Hertford Union Canal." It is considered that, although new bridges are currently being delivered, the premise of this sentence is correct and that the waterways continue to provide a barrier to movement, albeit one that is being mitigated overtime with</p>

						<p>development but there are additional enhancements that are required here. We would suggest that this should also be included in the Infrastructure Delivery Plan.</p>	<p>new bridges and connection improvements. It is not considered that this is inconsistent with Para 7.18, which addresses the wider issues of liveability and connections across the Legacy Corporation area and where rivers and canals present a barrier that requires mitigation in some locations.</p> <p>In respect of the suggested change to Figure 31 to show the Hertford Union Canal towpath as a 'Key Off-road Connection to be Enhanced', it is noted that this is an existing and well-used key off-road connection rather than one where a new or significantly enhanced route is required. It is understood that an improvement programme is in place here with a significant sum of S106 money recently allocated towards localised improvements. The current description is therefore considered to be correct. However, a project has been added to the Infrastructure Delivery Plan Project List to ensure that this work remains eligible for future contributions to improvements where necessary.</p>
PRN.034	R19.0194	no change propose	Section 7	Para 7.18	Canal & River Trust	Questions the extent to which rivers continue to be a barrier to movement in light of increased numbers of bridges in	Comment noted. It is considered that, although new bridges are currently being delivered, the

		d				the area and improvements to the towpaths and other aspects of connectivity in relation to the water ways.	premise of Para 7.18 is correct and that the waterways continue to provide a barrier to movement, albeit one that is being mitigated overtime with new bridges and connection improvements. Para 7.18 addresses the wider issues of liveability and connections across the Legacy Corporation area and where rivers and canals present a barrier that requires mitigation in some locations.
PRN.034	R19.0198	C216	Section 8	Para 8.13	Canal & River Trust	Supports the approach to smaller-scale projects that help to separate foul and surface water drainage.	Comment noted
PRN.034	R19.0201		Sub Area 4	Policy 4.2	Canal & River Trust	Sets out the Canal and River Trust role in relation to the canal network in the area. Highlights consultation requirements and consents that would be required in relation to a new bridge across Bow Back River.	Comment noted. The proposal for a new bridge across the Bow Back River is a reference that has been maintained in the Revised Local Plan from the Adopted Local Plan. At such time as this proposal should come forward it would be subject to the requirements around permissions and relevant consultation.
PRN.034	R19.0186	C147	Section 4	Policy B.3	Canal & River Trust	No objection to principle of interim uses however should also avoid adverse impacts on and enhance blue and green infrastructure for enjoyment by users. Should add following wording to (6): The uses will have no unacceptable adverse impacts on green and blue infrastructure and their users' enjoyment of them. Where appropriate,	The Legacy Corporation is willing to accept the proposed minor amendment to reference amenity impacts more generally. Please see proposed minor modification MM17: 5. The uses will have no unacceptable adverse impacts <u>including</u> on the amenity or function of the existing permanent business

						enhancements will be required".	or residential community.
PRN.034	R19.0190	C144	Section 6	Policy BN.1	Canal & River Trust	Support to the change to policy BN.1 which would see developments needing to "respect and enhance" landscape features rather than "relate well to" them. The Canal and River Trust believes that this greater clarity is consistent with para 16(d) of the NPPF and, in the context of the area's waterways, is consistent with their status as heritage assets.	Comment noted.
PRN.034	R19.0191	no change proposed	Section 6	Policy BN.2	Canal & River Trust	Support to retention of this policy, which in combination with other policies in the plan, will help to protect and enhance the waterways of the area, and that the LLDC continues to see the benefits of specific planning policies for the waterway. Canal & River Trust suggests that the following is added to the policy as point 8: "8. Protect essential waterway infrastructure".	This policy is considered sound in its original form in the Adopted Local Plan. However, the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed modification M3 which would add the following point 8 to the policy as requested: M3: <u>"8. Protect essential waterway infrastructure"</u> .
PRN.034	R19.0192	C163	Section 6	Policy	Canal & River	Canal & River Trust welcomes the	Support noted.

				BN.5 (formerly BN.10)	Trust	retention and enhancement of the policy on tall buildings.	
PRN.034	R19.0188	C71	Section 5	Policy H.1	Canal & River Trust	The number of houseboats is increasing and boats without home mooring has quadrupled. Trust has published a Mooring Strategy to respond to this and will need to work with other organisations to achieve aims. Keen to discuss any assessment the Corporation proposed to meet requirements of Section 124 of Housing & Planning Act on behalf of the borough housing authorities.	The Housing Requirements Study considers the role of need of boat dwellers within section 6. It considers that although there is no direct 'need' for new moorings within the area there is demand and the role of moorings in meeting overall housing need is small and would fall within the OAN figure for the area, not in addition to it (para 6.43).
PRN.034	R19.0196	C210	Section 8	Policy S.1	Canal & River Trust	Sets out the Canal & River Trust's commitment to promoting the wellbeing benefits of waterways, including potential for active travel and recreation, volunteering and mental health benefits. Wording is suggested to include waterways within policy S.1; "... This should include information on access to schools, health services, community facilities, leisure activities, local shops and services, waterways, parks and publicly accessible open spaces."	The proposed change is noted, however it is not considered necessary to change to the policy where the role of waterways is clearly set out in the supporting text. The suggested change, is therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.

PRN.034	R19.0197	C213	Section 8	Policy S.2	Canal & River Trust	Questions the energy hierarchy used within policy S.2 and where the Legacy Corporation supports the expansion of the existing heat network in the Legacy Corporation area, other solutions to heat and energy in the area, such as through the use of the canal network as a resource should be included or considered.	Comment noted. The energy hierarchy included within policy S.2 follows the Draft New London Plan energy hierarchy. Policy S.3 does support 'proposals for new heat networks or extensions to any existing heat network, or for renewable energy infrastructure' to serve development'. This means that whilst there is support for extending the existing network it is not at the exclusion of other solutions.
PRN.034	R19.0189	no change proposed	Section 6	Policy SP.3	Canal & River Trust	Support to the recognition that "regeneration, especially in the places that surround Queen Elizabeth Olympic Park, presents opportunities to maximise green infrastructure by integrating new development with waterways and green space and by protecting, extending and enhancing the existing green infrastructure network, local wildlife corridors and the East London Green Grid".	Comment noted.
PRN.034	R19.0195	C202	Section 7	Policy T.10	Canal & River Trust	Supports retention and updates to policy T.10 and highlights the London Mooring Strategy.	Comment noted. The Legacy Corporation will continue to work closely with the Canal and River Trust in relation to the London Mooring Strategy and its implementation.
PRN.034	R19.0193	C196	Section 7	Policy T.4	Canal & River Trust	Supports encouragement of use of the waterways and towpaths, highlights potential conflicts and pressure and how these can be managed by design,	Comment noted. The Legacy Corporation acknowledges the benefits presented by the waterways through potential for active travel,

						use of alternative routes, behaviour campaigns and developer contributions.	and there are a range of Local Connectivity schemes highlighted within the Revised Local Plan which aim to improve accessibility throughout the area in a variety of ways. Policy T.4 sets out requirements to manage development and the transport impacts of development as well as promoting sustainable transport choices and facilitating local connectivity.
PRN.034	R19.0200	C297	Sub Area 3	SA3.2	Canal & River Trust	Welcome need for design to take account of waterside setting and regard should be had to setting of local heritage assets such as Carpenters Road lock.	Noted
PRN.034	R19.0202	C313	Sub Area 4	SA4.5	Canal & River Trust	Welcomes the principle of the strong relationship and connections to the River Lee Navigation (rather than the River Lea) if SIL land is released for residential development. Expresses concerns around intensification of industrial uses and suggests a reference back to policies BN1 and BN2. The aspiration for a biodiverse open space buffer along the waterway should be balanced alongside the opportunity for more activity and natural surveillance along the waterway and towpath.	Comment noted.

PRN.034	R19.0187	C39	Section 4	Table 3	Canal & River Trust	Support for B.1a3 but question why other employment allocations do not include similar test of impact on environment and amenity given that other employment site allocations also include support for intensification.	This wording has been included to be consistent with that of the site allocation for that particular site (SA4.5)
PRN.035	R19.0205	C71	Section 5	Policy H.1	National Grid Property (NGP)	Gasholder site requires considerable works to remediate land and remove infrastructure which are abnormal costs so need flexibility of policy to ensure development can come forward. Dwelling mix should be based on design and viability. Continued emphasis on para 1 of meeting specified mix is inflexible so unsound as not effective.	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and strikes an appropriate balance between local and strategic requirements. The policy does include sufficient flexibility within it to take account of any site-specific circumstances.
PRN.035	R19.0204	C64	Section 5	Policy SP.2	National Grid Property (NGP)	Representation made in context of NGPs landholdings in Stratford at Rick Roberts Way. Site is south-eastern corner of SA3.6. NGP has formed joint venture company with Berkeley called St William Homes to deliver homes on redundant gas works sites in London and south east. Rick Roberts Way being considered for homes and community benefit. Welcome opportunity to comment but need to understand that viability is biggest issue.	Noted.
PRN.035	R19.0206	C303	Sub Area 3	SA3.6	National Grid Property (NGP)	SA3.6 sets the policy framework for Rick Roberts Way land including gasworks site. Sets out comprehensive mixed use development seeking a minimum of 750 homes and affordable housing threshold of 50% across portfolio of	It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed

					<p>sites. To enable delivery needs to consider viability to seek appropriate amount of affordable housing and support reference to cost of remediation but high density development should be a priority to make best use of brownfield land. LLDC should bring in flexibility. Reference to 50% affordable housing assumes public land across whole site but area in south-eastern corner is not so should not be subjected to this requirement. Need to also understand costs of removing surplus gasholders in delivering successful regeneration schemes. Site allocation should allow for gasholder site to come forward separately from the rest of the allocation with its own access. This would allow delivery of much needed housing even if there were delays to delivery of the wider area. SA3.6 seeks provision for primary school and open space and Table 6 identifies potential at Rick Roberts Way. This was previously identified in 2015 Local Plan as potential schools site and proposed change states site may be required in second half of plan period and if no such requirement this will be identified at the time based on monitoring of need. Given significant land take required for school it is important to review whether schools is</p>	<p>change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per cent where the development is on public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u></p>
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						<p>required in part or at all dependent on provision of other school places in local area. If there is a surplus then land should be reallocated for housing to help meet housing targets.</p> <p>Consequently flexible reference within the allocation are welcomed and is noted that if school is required this should not be on NGP land as it is constrained and costly to develop and would have viability implications. It is noted that the height figure has been reduced from the adopted plan from 31m to 30m but heights should be established through an iterative design process to ensure optimisation of brownfield land. Welcome recognition of remediation cost and this should allow for flexibility on affordable housing. Wording is unsound as it is not justified and is not most appropriate strategy to bring site forward. Look forward to working on Local Plan and support continued allocation of RRW gasholder site.</p>	
PRN.036	R19.0216		Sub Area 3		TfL Commercial	Support broad aims for Sub Area 3 including objectives to deliver 11,000 homes including affordable in period to 2036.	Noted
PRN.036	R19.0217	C289	Sub Area 3	Policy 3.2	TfL Commercial	Important that connections are improved around central Stratford and support objectives of 3.2. This includes new southwestern entrance to station.	Noted

						New entrance will improve accessibility of Carpenters Estate, raising PTAL and making suitable for optimisation for residential development. Detailed responses regarding connectivity and public transport will be provided in TfL response.	
PRN.036	R19.0208	C26	Section 4	Policy B.1	TfL Commercial	Welcome promotion of intensification of industrial land and co-location of business/employment uses with residential. Policies refer specifically to industrial land but there may be similar opportunities for housing and transport infrastructure e.g. over station development at railway and bus stations which should be included in Local Plan. Development typologies would optimise residential development in areas of high transport accessibility in line with draft London Plan Policy D6 and NPPF (102b, 106, 123 and 127) and would support meeting delivery targets. Believe this should recognise opportunities to co-locate transport and residential in over station development.	The approach to industrial land within Policy B.1 is in general conformity with the draft New London Plan which does not include housing and transport infrastructure. However, the potential for over-station development has been referenced within the Revised Local Plan at para 5.3 and housing policies emphasise that areas of high transport accessibility will be potential locations of higher density development.
PRN.036	R19.0209	C26	Section 4	Policy B.1	TfL Commercial	Welcome the policy which directs large-scale office uses towards Metropolitan Centre. TfL is proposing a million sqft office accommodation above the bus station at Stratford which would contribute to meeting 26,200job target for international quarter. Further	Noted

						information to be found in Policy 3.2 representations.	
PRN.036	R19.0210	C41	Section 4	Policy B.2	TfL Commercial	Support the broad aims of B.2 and alterations to (6) to allow positive approach to optimising housing locations in area which is in line to previous representations. Policy should however go further to promoted mixed use development residential led in town centres, adjacent to transport infrastructure.	It is considered that the policy allows for residential development in town centres as currently drafted therefore amendments are not necessary.
PRN.036	R19.0211	C52	Section 4	Policy B.3	TfL Commercial	Support recognition of interim uses in creating vitality however the policy does not recognise that meanwhile sites can play in provision of housing. Provision of modular housing is encouraged by draft London Plan H4. These are of high quality and can be used to meet specific housing needs where permanent development is unlikely in short term.	Para 4.32 includes reference to the role of housing as an interim use.
PRN.036	R19.0215	C163	Section 6	Policy BN.5 (formerly BN.10)	TfL Commercial	Supports the aims of the policy and the flexibility that this brings to assessing suitability of tall buildings in individual locations. While is in agreement with the 'generally expected' and 'prevailing' heights listed for the sub areas within the Revised Local Plan, considers that	Comment noted. It is considered that the flexibility in the policy approach, recognised in the representation, allows an optimisation of development that takes into account the suitability of the location and so is in accordance

						there is a need to assess the suitability of tall buildings in the LLDC area on a case by case basis. Identifies that TfL will be potentially be bringing forward developments in the LLDC area that have excellent connections to public transport and development on such sites should be optimised in line with the objectives set out in the DLP and NPPF.	with draft New London Plan and the NPPF.
PRN.036	R19.0213	C71	Section 5	Policy H.1	TfL Commercial	Support housing mix and need to provide 1, 2 and 3 bed units with SHLAA. These can be incorporated into all development typologies and optimise sites with high transport accessibility. In line with draft New London Plan D6 and NPPF.	Noted.
PRN.036	R19.0214	C111	Section 5	Policy H.7	TfL Commercial	Support the Revised Local Plan's position on Build to Rent which is in line with draft New London Plan H13. Policy states to qualify for the fast track route the tenure mix should consist entirely of discounted market rent with 60% offered at a discount equivalent to London Affordable Rent, 30% as London Living Rent and remainder at equivalent rates to other intermediate housing offers. While this is in line with the New London Plan this will have impact on viability and may mean developments cannot qualify for the fast track route. Welcome greater clarity on this.	Noted.
PRN.036	R19.0212	C64	Section 5	Policy	TfL Commercial	Welcome update to reflect the 2161 pa	Noted.

				SP.2		target and the affordable housing threshold approach contained within the draft New London Plan.	
PRN.036	R19.0219	n/a	Sub Area 3	Proposed Allocation : Stratford Bus Station	TfL Commercial	TfL CD support inclusion of Stratford Bus station in the Metropolitan centre and are currently considering the opportunity to redevelop the bus station to provide improved facility that can be co-located with office development of approximately a million sq ft. This redevelopment, one of the busiest bus stations in London would provide opportunities to improve services for passengers to provide better public space and to improve the interchange with Stratford underground, DLR and regional station. Office development would help meet employment targets and CD suggest site is allocated for transport infrastructure and look forward to engaging with the Legacy Corporation on this.	Noted. The site allocation does not go into the depth of plot-specific matters however it is acknowledged that the northern parcel of the allocation adjacent to Stratford Station is suitable for mixed use development, including residential. As part of this is also within the Metropolitan Centre boundary then Table 4 also applies to the parcel which highlights residential potential of the centre, focussed around the transport hubs and other attractors. However the Legacy Corporation is willing to accept that additional reference in Para 12.15 to the role of other significant development plans may be helpful. Please see proposed minor modification MM53: The allocation of sites to become a focus for retail, leisure and office development at Stratford and a destination for high-profile visitor, education, sporting and cultural attractions will be a further catalyst for change, enabling the economy to build on its current strengths, accelerating the performance and transformation of east London. <u>The development of other significant</u>

							<u>development plans across sites within the town centre may also support this role of the Metropolitan Centre.</u>
PRN.036	R19.0218	C301	Sub Area 3	SA3.4	TfL Commercial	Support continued allocation of Greater Carpenters District with focus on optimising residential to deliver 2300 homes in plan period. Site allocation notes it already benefits from strong PTAL scores of 4-6b and will increase through station access improvements. Site allocation can play significant role in meeting housing targets for area. TfL land ownership around station includes site east of Gibbins Road in north-east corner of SA3.4 allocation and given PTAL ratings high quality, high density development would be appropriate on site including high proportion of affordable homes. Policy could specifically reference this site as being suitable for residential led development. In cooperation with colleagues in TfL spatial planning Commercial Development will ensure proposals complement delivery of new southwestern entrance to station and do not preclude delivery of new western overbridge as part of integrated congestion relief scheme.	Noted. The site allocation does not go into the depth of plot-specific matters, however it is acknowledged that the northern parcel of the allocation adjacent to Stratford Station is suitable for mixed use development, including residential. As part of this is also within the Metropolitan Centre boundary then Table 4 also applies to the parcel which highlights residential potential of the centre, focussed around the transport hubs and other attractors. However the Legacy Corporation is willing to accept that additional reference in Para 12.15 to the role of other significant development plans may be helpful. Please see proposed minor modification MM53: The allocation of sites to become a focus for retail, leisure and office development at Stratford and a destination for high-profile visitor, education, sporting and cultural attractions will be a further catalyst for change, enabling the economy to build on its current strengths, accelerating the performance and transformation of east London. <u>The</u>

							<u>development of other significant development plans across sites within the town centre may also support this role of the Metropolitan Centre.</u>
PRN.036	R19.0220	C314	Sub Area 4	SA4.3	TfL Commercial	Highlights land in TfL ownership in the Pudding Mill area and aspirations around over-station development and the positive relationship this could have with a district centre. Asks for clarity around whether or not Pudding Mill Lane DLR station is included within the site allocation. Asks for the text to be amended to recognise potential development around the DLR station, including residential development, and highlights the need to optimise such development. The response also suggests extending the district centre to include the station and highlights the importance of this piece of infrastructure for the area.	Comment noted. The Pudding Mill Lane DLR station is included within the site allocation. The borders on the map referenced are indicative and whilst the national rail railways lines do mark the boundary, the DLR line lies to the south of these other railway lines. The station is acknowledged as a key piece of infrastructure within the area and as part of the key connections is clearly linked to the district centre as highlighted within the site allocation map and as such will become and integral part of the district centre.
PRN.037	R19.0222	C9	Section 5		St William Homes LLP	Whilst the commitment to review the Revised Local Plan in the context of the draft New London Plan is welcomed the timing could result in the submitted plan being out of step with the London Plan as finally published if substantive changes are made to this in particular employment land and affordable housing. Draft New London Plan raises a number of matters including loss of employment capacity, transposing	The proposed changes in the Revised Local Plan have been drafted to specifically take account of the policies within the draft New London Plan. Timing of the New London Plan EiP and the Examination of the Revised Local Plan are likely to be such that, where necessary any relevant changes to the new London Plan can be taken into account in order for the Revised Local Plan to

					<p>affordable housing policies set out in SPG, setting prescriptive development management policies, removal of density matrix and new design-led approach and increasing housing requirements to be delivered in outer London boroughs.</p> <p>Table 4.1 of draft New London Plan sets 10-year targets for net housing completions split per borough. LLDC is expected to deliver 21610 homes between 2019-2020 and 2028-2029 at an average of 2161 per annum. The Revised Local Plan responds with this on a pro-rata basis until the end of the plan period however the London target could increase which given land availability could be more in LLDC area than boroughs.</p> <p>New London Plan policies in relation to employment capacity and affordable housing will have a fundamental impact on housing delivery and as yet panel's recommendations are unknown which would need to be reflect on the Revised Local Plan and may go beyond scope of minor modifications. Therefore would suggest submission is delayed pending receipt of examiners' report to the Mayor.</p>	<p>continue to be in 'General Conformity' with the New London Plan.</p>
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						Terms of new NPPF will be effective for the Revised Local Plan examination. This introduces introduction of standard method for calculating housing needs and housing delivery test, viability appraisal and revised affordable housing provisions in particular in relation to Build to Rent.	
PRN.037	R19.0221	N/A	General Comments	General	St William Homes LLP	Sets out the role of St. William Homes as joint venture between Berkley Group and National Grid Property, having an interest in the Abbey Lane Gas Works site which forms part of Site Allocation 3.6 Rick Roberts Way. Considers that the site has the capacity to make a material contribution to housing delivery and can be delivered within the next five years. Raises concern about the timing of the Regulation 19 Publication draft of the Revised Local Plan in the context of the timings for Examination in Public and final publication of the New London Plan, considering that this presents an opportunity for the Revised Local Plan to be out of step with the New London Plan.	Comments noted. The draft Revised Local Plan has been specifically developed to take into account the strategy and policies within the draft New London Plan. The Mayor has also confirmed that the draft Revised Local Plan is in general conformity with the London Plan in this context. It is considered that the proposed changes in the Revised Local Plan remain flexible enough for it to continue to be in general conformity with the New London Plan once it has been published in its final form following the current Examination in Public.
PRN.037	R19.0226	C199	Section 7		St William Homes LLP	Parking standards should be site specific.	Comment noted, however the Legacy Corporation reflects the Mayor's aspiration for car free development, especially in areas where there are high PTAL levels. The parking standards applied by the

							Revised Local Plan are those within the London Plan.
PRN.037	R19.0223	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>The Lower Lea Valley Opportunity Area Planning Framework seeks the delivery of 50,000 new jobs and 32,000 new homes and site allocations should be reviewed in this context, focussing on delivery of homes and jobs. This should be read in conjunction with other policies such as H2. Further detail on the 'portfolio approach' is required as set out within H.2 (C17) the policy seeks 50% affordable housing across a number of allocated sites including SA3.6. Should confirm the portfolio only applies to LLDC land and not the site. Concern that as drafted this will not facilitate the timely delivery of the site and so is not positively prepared or sound. Should ensure the policy requirements where relate to infrastructure provision and do not result in duplication of S106 and CIL and direct provision is appropriately recognised. Primary school requirement is not justified and have submitted representations to CIL charging schedule consultation. Welcome the site allocation but amendments are sought to ensure development of the site can occur in advance of release of other elements of the allocation and does not fetter regeneration of wider</p>	<p>It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per cent where the development is on public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u></p>

						allocation.	
PRN.037	R19.0224	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Remainder of the land within SA3.6 is under separate ownership and delivery timescales may differ. Adidas have temporary permission for a sport facility on the north of the site for 3 to 5 years. SA3.6 should allow for independent delivery in a manner that is comprehensively planned. This should reflect the site specific circumstances and challenges and opportunities posed. Delivery should not be dependent on the adjacent land.</p> <p>Such an approach could accelerate housing delivery, enable remediation and decommissioning processes to commence and allow for viability of the site to be considered in isolation. LLDC can ensure that SA3.6 is comprehensively planned through an iterative design and masterplanning process.</p>	It is not considered that the site allocation prevents part of the site coming forward in advance of the land owned by the Legacy Corporation provided the whole site allocation is delivered in a comprehensive manner.
PRN.037	R19.0225	C17	Sub Area 3	SA3.6	St William Homes LLP	<p>St William recognises need to deliver affordable housing and support efforts to do so. Key element of this will be maximising number of homes delivered. Former gasholder sites are unique in terms of use and character and abnormal technical costs, with phasing implications. Costs associated with remediation and long term infrastructure requirements. LLDC</p>	It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per cent where the development is on

					<p>should adopt a flexible approach to affordable housing and developer contributions to ensure landowners are not discouraged from bringing complex brownfield sites forward.</p> <p>C303 and C17 refer to 50% affordable housing using Portfolio Approach across a number of allocations. This should be clarified as applying only to land within LLDC ownership. Revised Local Plan responds to draft New London Plan's approach in setting benchmark level of affordable housing and the trigger for viability review. Draft London Plan will be subject to examination and Panel may recommend changes. This sets a strategic 50% target across London and for industrial land the target is 50% if results in a net loss of industrial capacity.</p> <p>Redevelopment of the site will not result in a net loss of industrial capacity and if it were formally used for B class purposes this was sui generis. This is due to modernisation of gas infrastructure allowing these sites to perform functions in more efficient manner alongside new development.</p> <p>The redevelopment of the Site will not result in a net loss of industrial capacity.</p>	<p>public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u></p>
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						<p>Indeed, the Site is not nor was it formerly in use for Class B purposes but was in sui generis use.</p> <p>This is due to the modernisation of gas infrastructure allowing these sites to perform the functions which they currently do in a more efficient manner alongside new development. 50% target on the site would reduce flexibility and conflict with London Plan.</p>	
PRN.037	R19.0227	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Note that the Revised Local Plan has amended reference from all through school to primary school and that the land should be retained unless provision has been met elsewhere. This places burden on viability. The Schools Report seeks to assess pupil demand against capacity but it does not assess the suitability of the site to meet potential primary school need having regard to school catchment areas and deliverability. There is no testing of the feasibility of delivery of the school and effect provision will have on deliverability of site and allocation as a whole. If the reservation of land for primary school is justified and sound the Revised Local Plan should provide for the need and location and form of primary school and should be determined by iterative design process and confirm that the school site will not</p>	<p>The Adopted Local Plan includes the allocation for an all-through school with flexibility should this be provided elsewhere. The site allocation also required retention of sufficient land for a primary school unless that need has been demonstrably met elsewhere. The schools related evidence supporting the review of the Revised Local Plan continues to highlight this potential need. Therefore the amendment to reference a primary school recognises the recent past provision but is not considered a fundamental change in approach. The NPPF sets out that plans should include infrastructure requirements of sites so this approach is in accordance with national policy.</p>

						<p>be required on the site.</p> <p>Provision of land for and construction of primary school is not identified in CIL Charging Schedule so there is no mechanism for fair apportionment of cost (direct and in kind) through payment of CIL. On this basis SA3.6 could be burdened with cost of provision which would exceed need arising from regeneration of the allocation and thus fails to comply with Regulation 122 of CIL Regs.</p>	
PRN.037	R19.0228	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>MOL lies to the south of the site and site has potential to maintain the openness of the MOL. Development can serve as frame to MOL and enhance its function by acting as a strategic break in built form and well-defined boundary. SA3.6 should be clear in this respect.</p>	<p>It is considered that the current text of the allocation is sufficiently clear with respect to the MOL boundary.</p>
PRN.037	R19.0229	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Site is adjacent to Rick Roberts Way LSIS which is a cluster of high quality industrial design and manufacturing uses in B2 and B8. Residential led regeneration with complementary mixed uses is most appropriate given proximity to Stratford Metropolitan Centre. Development should complement the LSIS without harming function in accordance with Policy 4.4 of London Plan and emerging policies E6 and E7 and this should be confirmed within the Local Plan review.</p>	<p>Part of the site is subject to outline permission within the Legacy Communities Scheme. This will be revisited in the context of East Bank proposals however it is considered appropriate for predominantly residential development alongside a primary school and open space. As set out within the Adopted Local Plan allocation should the school no longer be required residential capacity could be increased along with introduction of business space.</p>

PRN.037	R19.0230	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Principle of residential use confirmed by SA3.6 and LCS permission. Allocation is for mixed use development including residential. The site should be residential led with complementary mixed uses as appropriate corresponding to proximity of Metropolitan centre and LSIS which provide focus for commercial uses. Supporting principles state that business space will be appropriate in this location however it is not located within an employment cluster as defined in Local Plan and regeneration would not fetter delivery of RRW North. Policy B.1 supports B class uses in clusters and support for encouragement of flexible uses in these locations. B.3 encourages reuse of vacant land for temporary uses. Welcome policy approach and consider potential for meanwhile uses as part of commitment to delivery.</p> <p>Principle of no net loss of industrial floorspace capacity does not apply to utility infrastructure see amendment to draft London Plan (6.4.5b). Local Plan should confirm this to be consistent with the draft London Plan para 9.3.10 which recognises vital role sites play redevelopment. Site is former gas works and is vacant. Contributions site has made to employment in past years is</p>	Noted.
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						negligible or nil. Local Plan should not seek land uses that place a burden on viability and achievability of regeneration of site and undermine contribution to housing needs. Allocation provides increase in residential capacity to be secured in tandem with business space. Increase in residential capacity above 750 target should not be depend on increase in business space but through masterplanned approach. Priority should be to maximise residential delivery through high quality regeneration of the site rather than a further cost burden.	
PRN.037	R19.0231	C303	Sub Area 3	SA3.6	St William Homes LLP	SA3.6 change 303 seeks to constrain height to 30m, presumably drawing on the Characterisation Study which is a reduction from 36m. Emerging London Plan policy D8 requires plan-led approach to tall buildings and locations identified in Plans to take account of visual, functional, environmental and cumulative impacts, potential contribution to new homes, economic growth and regeneration and public transport connectivity. Building heights for the site should be established through an iterative design process. Approach would be consistent with national policy through making as much use as possible of previously developed	The amendment of the wording of the allocation was to ensure consistency in approach across the sub area. The trigger for the tall buildings policy (now BN.5) remains the same across the sub area at 30m where proposals above this height will need to meet the policy tests set out within this policy.

						or brownfield land. This would accord with the new London Plan which promotes proposals that make most efficient use of land.	
PRN.037	R19.0232	C303	Sub Area 3	SA3.6	St William Homes LLP	Housing Density and Mix (C71). SA3.6 does not indicate residential density for site and this is supported. H.1 should be reviewed in relation to draft London Plan where density matrix has been removed and replaced with design led approach to determining capacity. A policy on density should seek to ensure accordance with paras 117-123 of the NPPF. The mix of dwellings should be determined on a site by site basis having regard to characteristics and location of site and proposed developments including viability.	Policy H.1 and H.2 set out the housing mix requirements and density considerations.
PRN.037	R19.0233	C303	Sub Area 3	SA3.6	St William Homes LLP	Allocation requires redevelopment of wider site to include Local Open Space including playspace and BAP habitat. BN.7 requires proposals for major development schemes to consider provision of new high quality and publicly accessible LOS within a scheme where there is an identified qualitative or quantitative deficiency in that location. Recognises role open space and green infrastructure play in creating successful and sustainable places. Form and function of space should be determined by iterative design process and not be unduly prescribed and	Noted

						should be reflected in policy. Support for ambition for development to contribute to net gain in biodiversity and aligns with st William Vision.	
PRN.037	R19.0234	C303	Sub Area 3	SA3.6	St William Homes LLP	SA3.6 requires walking and cycling access along Greenway. Acknowledges that subject to masterplanning and viability there is scope to enhance connectivity and integrate with Greenway. Contributions sought should meet the statutory tests and CIL Regulations.	Noted
PRN.037	R19.0235	C303	Sub Area 3	SA3.6	St William Homes LLP	Site's development should respond to surrounding heritage assets including Abbey Mills Pumping station and cottages on Abbey Lane and setting of Three Mills Conservation area to south. To be addressed through comprehensive design process in accordance with para 126-129 of NPPF. Policy should describe the response.	The site allocation includes acknowledgement of the conservation area and adjacent listed buildings within its Development Principles.
PRN.038	R19.0236	C71	Section 5	Policy H.1	British Land	British Land own site within the site allocation SA4.1. Welcome acknowledgement of Build to Rent and its role as a discount market rent in contribution to housing choice. This reflects draft New London Plan H13.	Noted.
PRN.038	R19.0237	C87	Section 5	Policy H.2	British Land	Welcome acknowledgement of the Fast Track and Viability tested routes which ensure alignment with the New London Plan. Query requirement for developers to demonstrate engagement with a registered provider from outset as it is	The proposed change which inserted the wording ("from the outset") was for clarification only and does not alter the approach of the Para. No changes are therefore proposed.

						<p>overly prescriptive and may limit schemes coming forward as would not want commitment where there is still uncertainty or for commercial reasons. So should be removed.</p>	
PRN.038	R19.0238	C312	Sub Area 4	SA4.1	British Land	<p>Sets out what is included in the Bromley-by-Bow site allocation and focuses on the allocation as a district centre and the inclusion of up to 50,000sq.m of retail floorspace. Suggests that due to Retail Study undertaken as part of the Local Plan Review does not support the designation as a District Centre and the need for retail floorspace at this location has not been demonstrated to this level. Suggests this be amended to a Neighbourhood Centre and that this is reflected in the wording around retail floorspace stating 5,000-50,000 square meters, reflecting the Draft New London Plan and that the level of retail that should come forward should reflect what is viable. Also challenges the levels of development in relation to PTAL ratings in the area which it states are unlikely to change, even with the junction works that are due to take place in the area.</p>	<p>Comment noted. As part of the Legacy Corporation's Local Plan Review a robust evidence base has been produced, this includes evidence in relation to retail and the economy in the area. This evidence continues to support the area as a proposed District Centre, yet to be designated. Designation would only take place where development delivery had achieved the required floorspace targets. The retail and town centre needs assessment provides a forecast which continues to support the area as a proposed District Centre. Whilst no material change has been made to the site allocation, it is considered that the glossary should be updated to reflect changes in relation to retail floorspace definition for district centres. The Legacy Corporation is willing to accept the proposed minor amendment of the reference to quantum of retail floorspace in district centres..</p> <p>A minor modification (MM65) to the</p>

							glossary is proposed as follows: 'Glossary - District Centre... Typically they contain 5,000 10,000-50,000 sqm...'
PRN.038	R19.0239	C312	Sub Area 4	SA4.1	British Land	Queries the case for the inclusion of a primary school as part of the site allocation at Bromley-by-Bow. Suggests the evidence for need for a school on the site be re-examined to confirm that a facility such as this is needed here, and that the wording be changed, so that this is only a requirement if such a re-examination of the evidence were to show that there was still a need for a school in this site allocation.	Comment noted. As part of the Legacy Corporation's Local Plan Review a Schools Study has been produced which clearly shows the case and need for a Primary School as part of this site allocation. The need for Primary School places in the area is further supported by evidence produced by the London Borough of Tower Hamlets as part of their Local Plan Review.
PRN.039	R19.0240	no change proposed	Section 5	Policy Cl.1	NHS London Healthy Urban Development Unit	Suggests that policy Cl.1 acknowledges the use of developer contributions to deliver health facilities, highlights that where flexible community space is referred to this is welcome as requirements can change but that clinical space cannot be shared with other uses. Supports where rationalisation of facilities is included and sets out that for health facilities this centres on clinical need. Discusses future provision and mentions inconsistencies between the Infrastructure Delivery Plan and site allocations. Welcomes the opportunity to continue to work closely together with the Legacy Corporation and would	Comments noted. The Legacy Corporation's approach to planning obligations is set out within the Legacy Corporation's Planning Obligations SPD. As requirements have been shown to change through the process from application to delivery of schemes, flexibility has been maintained within the policy to ensure that appropriate space comes forward as opposed to inappropriate space that cannot be used. The Infrastructure Delivery Plan list of projects is regularly reviewed and shall be further reviewed before submission, with focus on healthcare facilities to

						like to continue to have involvement around section 106 agreements.	ensure there are no inconsistencies. It also includes the identification of planned health facilities, for example within the LLDC's Legacy Communities Scheme at Sweetwater and elsewhere, where delivery is required by the associated S106 Planning Obligation. Significant quantities of Use Class D1 space are currently consented within the LLDC area and provide a flexible opportunity for additional healthcare provision in the event that the CCGs or other providers require this. The Legacy Corporation welcomes the opportunity to continue to work with the CCGs on healthcare provision in the Legacy Corporation area.
PRN.039	R19.0241	C210	Section 8	Objective 5/Policy S.1	NHS London Healthy Urban Development Unit	Supports objective 5 but queries the clarity of policy S.1 and how this policy will help deliver these aims and suggests that the wording be changed to add clarity and that health impact assessments become a requirement.	The proposed suggested changes area noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.1 has undergone minor changes to reflect the Healthy Streets approach set out in the Draft New London Plan, therefore this policy has been updated to reflect the current context, rather than being materially changed. The suggested change is,

							therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.039	R19.0241	C210	Section 8	Policy S.1	NHS London Healthy Urban Development Unit	The representation is supportive of Objective 5 but queries the clarity of policy S.1 and how, in practice, this policy will help deliver these aims. It suggests that the wording be changed to add clarity and that health impact assessments become a requirement.	The proposed suggested changes area noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.1 has undergone minor changes to reflect the Healthy Streets approach set out in the Draft New London Plan, therefore this policy has been updated to reflect the current context, rather than being materially changed. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.040	R19.0261		Sub Area 3	Figure 36	Stratford City Business District Limited	Bridge between IQL and Stratford Waterfront is a key connection on road. This is incorrect as this is for residential access only and proposed as such through Stratford waterfront hybrid application. Figure 36 should be amended to show off-road connection.	The Legacy Corporation is willing to accept the proposed correction to Figure 36. Please see proposed minor modification MM52. which amends this to show correctly as an off-road connection.

PRN.040	R19.0242	N/A	General Comments	General	TfL Commercial	Sets out the role of TfL Commercial as a landowner which is separate to that from the functions of TfL as the strategic transport authority in terms of land-use planning and transport policy matters. Identifies the Mayor of London's target for TfL Commercial to commence the development of 10,000 new homes in London by March 2021; at least 50% of these new homes must be genuinely affordable. Has identified a number sites within the LLDC area which could make a significant contribution towards meeting targets. Considers that the Revised Local Plan should optimise those opportunities.	Comments noted. Specific comments on the proposed changes to the Adopted Local Plan are addressed elsewhere in this schedule.
PRN.040	R19.0242	N/A	General Comments	General	Stratford City Business District Limited	Identifies the role of SCBD Ltd as a joint venture between development partners Lendlease and London and Continental Railways. SCBD Ltd is promoting the International Quarter London (IQL), when complete will provide a vibrant mixed-use development comprising office, residential and leisure use, integrated with a high quality public realm. IQL is the main location for Grade A office floorspace in the Stratford City Metropolitan Centre and will provide at least 280,000m ² of office floorspace when fully developed. To date Buildings S5 and S6 are completed and occupied providing 94,030m ² of office floorspace, with a further	Comments noted. It is considered that the Revised Local Plan is consistent with the New London Plan, indicated by the Mayor of London's letter of general conformity, including in the approach taken to reference to the CAZ reserve. Changes to design policy are considered to be proportionate to the context of the LLDC area and to achieving the wider strategy outlined in the adopted and draft Revised Local Plan. It is considered that the changes proposed to the Adopted Local Plan have also been adequately tested in

						<p>78,452m² consented for Building's S9 and S4. This is supported complementary retail and leisure uses and residential use, with 333 dwellings in Glasshouse Gardens already constructed and occupied.</p> <p>Considers that the Revised Local Plan should be consistent with Draft New London Plan regarding the future potential CAZ reserve designation; There is concern over additional controls on design and procurement; and the Revised Local Plan viability</p>	terms of viability.
PRN.040	R19.0245	C32	Section 4	Para 4.13	Stratford City Business District Limited	<p>Central Activities Zone policy SD4 of draft New London Plan state at part N that boroughs should define detailed boundaries of CAZ satellite and reserve locations. Of same document para 2.4.3 states that these locations are Stratford and Old Oak Common. Minor Suggested Changes document removed this requirement to define these boundaries. The Revised Local Plan has not been updated to reflect this and is out of date with the Strategic Development Plan, therefore definition of the reserved boundary is unjustified and unsound. These references should be removed from Table 4 and Para 4.13 as is inconsistent with London Plan.</p>	<p>The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.</p>
PRN.040	R19.0249	C76	Section 5	Para 5.12	Stratford City	Covenant restriction for 15 years is too	The approach to the covenants of

					Business District Limited	<p>broad and should be amended to a maximum of 15 years to align with funding lengths for numerous operators and allow for exit should market fail. Clawback reference should be clarified to take into account only forgone planning obligations and is capped at policy compliant level of affordable housing if considered as a for sale scheme. Needs this to be effective and justified. To be sound should amend to "covenant for a maximum of 15 years and containing specific management measures" and "clawback capped at policy equivalent amount".</p>	<p>Build to Rent schemes is already included within the Adopted Local Plan and the introduction of the wording of 'at least 15 years' is in line with the approach within the draft New London Plan which is considered also to clarify what the Adopted Local Plan refers to as 'the long term'. Therefore specification of 15 years is providing clarity on what is already contained within the Revised Local Plan and therefore is not considered to be a soundness issue.</p>
PRN.040	R19.0252	C88	Section 5	Para 5.15	Stratford City Business District Limited	<p>Build to Rent restrictions are too onerous and do not recognise the distinct economics. The tenure mix states 60% equivalent to London Affordable Rents (LAR) rents, 30% London Living Rents (LLR) and 10% equivalent rates to other intermediate products. This is inconsistent with the New London Plan which has a 30/70 LLR/range of genuinely affordable rents. There has not been consideration of the level of discount required and viability of achieving the threshold. It is not justified to have same tenure mix for sale and Build to Rent and flexibility should be added in line with New London Plan. Restriction that would be subject to viability tested route is too</p>	<p>The requirements in relation to Build to Rent schemes are considered to be in general conformity with the draft New London Plan. In relation to affordable housing tenure, New London Plan Policy H7 identifies that 40% of affordable housing shall be determined by the local planning authority dependent on need evidence.</p> <p>The Viability Study tested Build to Rent schemes as 30% London Affordable Rent ('LAR') and 70% London Living Rent ('LLR'); 60% LAR and 40% LLR; and 60% LAR, 30% LLR and 10% DMR at 80% of Market Rents. The draft New London Plan</p>

						inflexible and inconsistent with London Plan H13.	identifies under Policy H13 that for Build to Rent schemes to qualify for the Fast Track Route (FTR) the Mayor expects at least 30% of DMR homes will be provided at an equivalent to LLR with the remainder of the 70% at a range of genuinely affordable rents. On this basis it is considered that the scenarios tested in the Viability Study appropriately test this requirement. The Housing Delivery Explanatory Note also provides more detail on the approach of the Viability Testing.
PRN.040	R19.0251	C85	Section 5	Para 5.19	Stratford City Business District Limited	Para sets out target and tenure mix and is according to evidence and subject to viability testing to determine viability across the whole area. Quod have reviewed the Housing Requirements Study and this has not considered demand for Build to Rent units against market sale in detail and the mix of the two distinct tenures. Example is impact of shared accommodation within Build to Rent which support housing needs for high quality affordable accommodation. Review of the Viability Study has raised concerns in note about approach taken. Concerns raise risk of deliverability of 35% target where a number of specific items have not been considered in full. Given new viability	The Housing Requirements Study considers the need for housing of different tenures. The OAN for the area relates to the need for housing and does not stipulate the specific tenure therefore Build to Rent can contribute towards meeting these needs as identified within para 3.11 of the Housing Requirements Study.

						policy and importance of testing at plan level state these need to be considered in more detail with clearer understanding of findings to allow those to understand results.	
PRN.040	R19.0253	C129	Section 5	Para 5.51	Stratford City Business District Limited	Wording states where population density above equivalent schemes with transport or infrastructure demand impacts further S106 contributions may be sought. This wording is ineffective and unsound as no detail on what is considered sufficient which should be defined.	This matter would be dealt with on a case by case basis.
PRN.040	R19.0256	C167	Section 6	Para 6.27	Stratford City Business District Limited	<p>The NPPF (July 2018) considers control of design quality from consent to implementation in Para 130, which states: <i>“Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).”</i></p> <p>The proposed wording is considered unreasonable and not justified as design detailing can be secured through appropriately worded conditions and as it is more restrictive and not consistent with national policy. Considers that to become sound the proposed wording of</p>	This supporting wording has been provided to explain how the LPA is likely to seek to secure design quality in the event that it receives an outline application for a tall building, given the importance of detailed design to achieving an acceptable impact on surroundings for tall buildings. The wording in relation to obligations to secure adequately skilled design teams is not a specific policy requirement as it is not referenced within the policy itself. The wording in Para 6.28 is clear that there is flexibility in the approach to be followed. Securing the obligation via a S106 agreement will require the agreement of the applicant which means the precise form of obligation can be tailored to reflect

						Paras 6.27 and 6.28 should be amended to remove the reference to seeking obligations to secure adequately skilled design teams for later design and delivery stages.	the circumstances of individual proposals. It is considered an appropriate approach to addressing the requirement set out in Para 130 of the NPPF.
PRN.040	R19.0257	C168	Section 6	Para 6.28	Stratford City Business District Limited	see above	See above
PRN.040	R19.0259	C286	Sub Area 3	Policy 3.1	Stratford City Business District Limited	Support for policy to become International centre and directing large scale town centre uses to within Stratford Metropolitan centre, support for growth in office floorspace and new residential accommodation in appropriate locations. Criterion 2 refers to boundary of the potential CAZ reserve and this is unjustified and unsound and should be removed.	The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.
PRN.040	R19.0246	C41	Section 4	Policy B.2	Stratford City Business District Limited	SCBD supports promotion of complementary residential development in centres to optimise delivery as sought by revisions to B.2.	Noted
PRN.040	R19.0254	C149	Section 6	Policy BN.4 Criterion 2.	Stratford City Business District Limited	Expresses concern about the introduction of the reference to the LLDC Design Quality Policy into this policy as it is a guidance document and does not consider it to form part of the	It is considered that the wording of the policy is sufficiently clear in respect of the status of the LLDC Design Quality Policy as best practice guidance to justify the inclusion of

						<p>LLDC's planning policy. Is concerned is a concerned that by introducing reference to the LLDC's Design Quality Policy the policy gives the guidance more weight for a document, which has not been subject to the same level of scrutiny and examination as Supplementary Planning Documents or Development Plan Documents. Considers that references to local guidance should be removed from the policies in Local Plan as it is unjustified and unsound. If references are to be included these should be made as supporting text only.</p>	<p>this reference. This also reflects the similar existing approach within unchanged Policy BN.6 Requiring Inclusive Design, to the LLDCs Inclusive Design Standards.</p>
PRN.040	R19.0255	C163	Section 6	Policy BN.5 (formerly BN.10)	Stratford City Business District Limited	<p>Objects to elements of the wording of Para 5 of the policy in respect of outline applications for tall buildings considering the wording to be ineffective as it does not specify what level of detail would be sufficient for design codes for outline proposals for tall buildings. Suggests amendments that should the policy be adopted would make it sound: "Outline planning applications for tall buildings will only be considered as an acceptable approach where the application is accompanied by a sufficiently detailed design code <u>addressing considerations 1-6 above</u>, coordinated with parameter plans, with these secured as part of any planning</p>	<p>It is considered that the wording as proposed is sound and that Para 6.27 provides sufficient explanation of what is likely to be required. The amendments suggested are considered to provide a sufficient level of flexibility to take the different circumstances into account that are likely to apply to individual scheme proposals and sites.</p>

						permission.”	
PRN.040	R19.0248	C71	Section 5	Policy H.1	Stratford City Business District Limited	Part 1 of H1 seeks schemes including Build to Rent to provide a mix of unit types with 2 bedrooms or more constituting more than half the total. We consider this too restrictive and not reflecting housing needs where small units are more affordable including studios and 1 beds. The Housing Requirements Study suggests there is high demand for 2 bed market and affordable homes this is inconsistent with draft New London Plan H12 which does not allow prescriptive dwelling mix requirements for market and intermediate. Para 5.11 should state detailed mix of sizes be considered by site circumstances as wording is too restrictive and unjustified. This should be an aspiration and not a policy restriction. This is inconsistent with draft New London Plan H12c.	<p>Policy H.1 is not considered too prescriptive. Para 5.11 allows for a 'balanced mix' of 1, 2 and 3 bed dwellings.</p> <p>The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.</p>
PRN.040	R19.0250	C84	Section 5	Policy H.2	Stratford City Business District Limited	Amendments are proposed to wording to be consistent with draft New London Plan and Fast Track and Viability tested routes and thresholds. Policy has also been amended to clarify the tenure breakdown as 60/40 low cost rented but its not clear what the requirement for Build to Rent is. This should be consistent with London Plan H13. Support for changes to align with New London Plan and where Build to Rent is	It is considered that the approach within policies H.1 and H.2 provide clarity on the role of Build to Rent (see Para 5.21 and 5.12) therefore no amendment is required to ensure soundness of the Revised Local Plan, legal compliance or general conformity.

						proposed should be consistent the draft New London Plan approach to fast track and viability tested route. With this clarification will be effective and sound.	
PRN.040	R19.0247	C64	Section 5	Policy SP.2	Stratford City Business District Limited	Mayor has set out the threshold approach in Affordable Housing and Viability Supplementary Planning Guidance and incorporated into the draft New London Plan. Additional wording for SP.2 of the LLDC Local Plan states maximising affordable housing through a minimum 35% target across area and applying the 35% and 50% thresholds on habitable room basis. This wording is not clear when the thresholds apply referring to London Plan which could be published before Revised Local Plan adoption and reference would be out of date. Wording is not effective and unsound so requires further clarity to criterion 2 on threshold approach.	<p>The Legacy Corporation is willing to accept the proposed minor amendment to add clarity that 50% is the Mayor's strategic target for London and when the 35% and 50% threshold approach apply.</p> <p>Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a <u>strategic target of 50% affordable housing across London. The Legacy Corporation will apply the Mayor's</u> an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity.</p>
PRN.040	R19.0260	C295	Sub Area 3	SA3.1	Stratford City Business District Limited	SCBD supports inclusion of minimum yield of 2000 homes within allocated site which will help with vitality of the centre in accordance with NPPF para 85f. It agrees with revisions to development principles for Development Parcel 1 to introduce residential uses in addition to office and local service retail. This is a positive revision that allows for appropriate land	Noted

						uses to be provided to integrate the commercial centre and residential directly to the north of the Metropolitan Centre.	
PRN.040	R19.0244	C25	Section 4	Table 4	Stratford City Business District Limited	Part N of SD4 (Central Activities Zone) as published in December 2017 of the new draft London Plan states that the detailed boundaries of CAZ satellites and reserve location should be set out for Stratford and Old Oak Common. However the minor suggested changes in July 2018 removed this requirement and the Local Plan has not been updated with this respect so is out of date with the Strategic Development Plan and is unsound. References to CAZ reserve in Table 4 and Para 4.13 should remove these references to be sound.	The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.
PRN.041	R19.0262	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for	Noted

						decades to prevent such change and continue to do so.	
PRN.042	R19.0263	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.043	R19.0266	n/a	Section 5		Unite Students	Appendix showing comments made to the draft New London Plan submitted.	Noted.
PRN.043	R19.0264	n/a	Section 5	General	Unite Students	On behalf of Unite Students the leading manager and developer of student accommodation. Unite recognise provision of PBSA contributes to meeting housing need as it alleviated housing needs by increasing availability of larger family size dwellings and new provision. This is in accordance with the NPPG and NPPF which states local planning authorities should plan for sufficient student accommodation whether it consists of self contained or halls or residents, on or off campus.	Policy H.4 is considered to be in general conformity with the draft New London Plan and Para 5.28 confirms that new student accommodation can contribute towards the supply of housing.

						<p>Encouraging more dedicated student accommodation may provide low cost housing taking pressure off private rented sector and increase stock. London Plan Policy 3.8 states strategic and local requirements for student housing meet a need in locations with good transport access. Draft policies of New London Plan includes a policy on this H17 which states that boroughs should seek to ensure need is addressed at neighbourhood level, where secured for students, for occupation by members of an organisation, at least 35% secured as affordable and where has functional living space and layout. It also states that student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well connected to local serviced by walking, cycling and public transport away from existing central London concentrations as part of regeneration and redevelopment schemes. It also recognised that PBSA all contribute to London's need and is not in addition to conventional need. Three bedrooms equate to one conventional housing unit and meeting housing targets on the same ratio. Therefore encouraged LLDC to review and update policies to be</p>	
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						more flexible and recognise how PBSA contributes to overall housing need and support mixed and balanced communities.	
PRN.043	R19.0265	C97	Section 5	Policy H.4	Unite Students	<p>In relation to policy H.4 we note the policy requirement to secure the accommodation through planning agreement or condition for long term student use and be secured for occupation by students of a specified higher education provider. However the previous wording allowed for maximisation for affordable student provision where not possible to secure a nomination agreement therefore policy as amended is more onerous and should be amended to allow for a nomination agreement or the provision of affordable accommodation.</p> <p>Policy as amended could prohibit PBSA developments coming forward as doesn't follow thrust of London Plan. This imposes a further requirement that secures a higher education provider through legal agreement, and this is too restrictive at an early stage in the planning process and does not coincide with the way Unite operate which is to generate demand through students letting directly. Universities are often also reluctant to engage in agreements where they are liable to void payments</p>	<p>It is considered Policy H.4 is in accordance with the approach set out within the draft New London Plan which makes the amendments with respect to linkages to higher education providers and the requirement for affordable housing. The approach to securing a legal agreement is also contained within the draft New London Plan so will be applied across London as a whole.</p> <p>The supporting text at Para 5.28 acknowledges that the provision of student accommodation contributes towards the overall supply of housing. In this context seeking 35% affordable student accommodation is appropriate.</p>

					<p>if they are unable to fill rooms or risk losing the development if it falls behind in the planning or construction process. Removal of this restriction will give greater flexibility and enable delivery essential to addressing student accommodation shortfall.</p> <p>Wording which states that new provision outside the Metropolitan centre area will be acceptable where suitably located for access by walking, cycling or public transport to higher education provider to which proposal is linked. This is supported as it allows flexibility to location provided it meets a need. Therefore encourage support for PBSA across the area as all locations are a short walk to existing and proposed facilities.</p> <p>Policy states provision should facilitate a positive balance of tenure and income and have no adverse impacts. This amended wording is supported however it should recognise how PBSA contributes to mixed and balanced communities. Student population should be afforded an equal standing to residents given that they contribute significantly to local and wider economy and alleviates pressure on housing land supply. Need of students accessing GPs,</p>	
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					<p>opticians and dentist services are lower than residential properties with older family members of children as they invariably attend on campus or where parental home is. PBSA also pay for their refuse collection within the development itself minimising inconvenience to street or council services. Supporting text adds further caveat that there is justification of local market need to ensure proposals will not impact on aims of mixed and balanced communities which is supported. Deletion of reference to overconcentration is strongly supported.</p> <p>In bullet 4 the inclusion of requirement to deliver maximum amount of affordable housing is supported however this should be linked to part 1 and the affiliation of an HEI as this also influences the affordability. This is supplemented by para 5.31 which states that the draft New London Plan expects non-self-contained accommodation to contribute to the supply of affordable housing and new proposals should provide a minimum of 35% on site affordable bedspaces available at a rate affordable to students on maximum state funded financial support, defined and indexed</p>	
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					<p>by the Mayor. Unite are concerned that the affordable rent requirement is too high and will hinder delivery. It cannot be considered in isolation and must be alongside CIL which add to development costs. This will place additional pressure on conventional housing. Additional barriers will slow down delivery in pipeline with unintended consequences such as reduction in supply of PBSA, affordable rent, rents increasing and increase in students in HMOs/general housing and reducing supply.</p> <p>With supply reduced the market will dictate rents of limited supply which will become more expensive. If 35% affordable rent requirement is enforced it is likely that providers will increase rents on remainder to mitigate impact. The practicality of implementation of the policy is flawed and should be left to market. Policy does not allow for consideration of management of the affordable percentage, ie by whom and who dictates the allowance. Unite has made representation to the New London Plan with this respect, included in Appendix to this representation.</p> <p>Support inclusion of para 5.20 which acknowledges the new draft New</p>	
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						<p>London Plan policy which states that ‘provision of new purpose-built student accommodation (PBSA) can contribute towards the overall supply of housing’, however this states that it should be dispersed and LLDC should ensure that it is permitted in area where meet genuine needs and be appropriate in location. The dispersal fails to consider the contributions it can bring to a locality. Wording which states it will be monitored on a 3:1 basis is supported.</p> <p>It is understood LLDC is consulting on preliminary draft CIL charging schedule however Unite will not be making representation to the increase to £123.17 from £100. Support review of the Adopted Local Plan.</p>	
PRN.044	R19.0270		Section 5		LB Newham	<p>The following are the London Borough of Newham’s principal concerns with regard to housing policies. Objective 2 sets out target of 22,000 new homes between 2020-2036. SP.2 highlights importance of providing full range of identified size, accommodation and tenure requirements including family housing in all tenures, specialist housing products and mix. This is also highlighted in policy H1 in terms of securing a mix of accommodation types. However despite the extensive Housing Requirements Study (HRS) evidence on</p>	<p>The borough Strategic Housing Market Assessments were considered within the Housing Requirements Study (2018). It is considered that the policy approach strikes an appropriate balance between local and strategic requirements.</p> <p>Alike the New London Plan the glossary defines family housing as units of 3 or more bedrooms. The principle of mixed and inclusive communities is a key consideration</p>

					<p>housing need is taken from the GLA SHMA and does not reconcile this with the Outer North-East London SHMA and that of neighbouring boroughs.</p> <p>Failure to sufficiently account for this wider evidence has delivery implications for full range of identified size, accommodation and tenure requirements. This ties in with need to create mixed and inclusive communities alongside sufficient infrastructure as outlined within section 5.</p> <p>The Housing Background Paper states a balanced mix approach of the Revised Local Plan has been informed by size requirements of HRS and SHMA and that of the boroughs identifying a greater need for 3 bed homes (Newham and Hackney). At para 5.11 it is stated that 2 bed plus properties should exceed 1 beds and should show how family accommodation is maximised. Whilst this satisfies the GLA's SHMA need and the HRS it does not go far enough for the Outer North East London's SHMA for 3 beds at 64%, so more emphasis on 3 beds is encouraged together with target for all proposals as is detailed on low cost rents.</p> <p>There is no explicit definition of family housing questioning how this will be</p>	<p>of the Revised Local Plan as a whole and a number of the site allocations specify where family housing is considered a priority (e.g. SA4.3, SA2.1, SA2,2 and SA2.3). The four boroughs have been engaged throughout the process of evidence-base preparation from commencement in 2017 and London Borough of Newham have signed a Statement of Common Ground which includes matters related to housing.</p> <p>The approach to affordable housing and the requirement to calculate on a habitable rooms basis is in conformity with the approach set out within the draft New London Plan. In practice by unit and habitable room calculations are often made on applications. Policy H.7 deals with shared living proposals and this does direct such proposals to particular locations, i.e. the Metropolitan Centre and the policy also states that schemes will need to relate positively to mixed and inclusive neighbourhoods.</p> <p>As above the Legacy Corporation is willing to accept the proposed minor amendment to add clarity that 50%</p>
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					<p>implemented with no guidance on acceptability of studios in meeting housing mix requirements. Not expressed how family housing requirements are to be balanced against infrastructure and affordable housing provision in viability terms. This has implications on achieving sustainable development objectives across Newham and LLDC area generally with regard to mixed and balanced communities and infrastructure support. Additional engagement on local authority needs would help address this which questions how the Revised Local Plan has been positively prepared informed by agreement with other authorities and its likely effectiveness. Clear tests have not been satisfied in engaging with existing evidence of the boroughs to ensure a joined-up approach in delivering national policy objectives relating to sustainable development.</p> <p>SP.2 seeks a minimum target of 35% across the area applying the Mayor's threshold levels of 35 and 50% on habitable room basis. It also sets out a 60/40 low cost rented/intermediate split as commitment to applying Mayor's fast track and viability tested routes and thresholds. This is not</p>	<p>is the Mayor's strategic target for London and when the 35% and 50% threshold approach apply.</p> <p>Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a <u>strategic target of 50% affordable housing across London. The Legacy Corporation will apply the Mayor's</u> an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity</p>
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					<p>accompanied by any analysis of whether these would have most local benefit relying only on the draft New London Plan approach. The Newham Options Appraisals modelled these alternative approaches and how they would play out in practice, and the results demonstrated that on a unit basis yielded higher levels of affordable housing. Such modelling would provide a more robust justification of targets used and the approach is justified in terms of maximising affordable housing delivery.</p> <p>There is also over-reliance on public landowners to deliver affordable housing as set out within Para 5.5. The requirement of 50% on publicly owned land is discussed in Background Paper and dependence on these to compensate for under-delivery across the area disregards the mixed and balanced communities objectives promoted in plan. Whilst LBN recognise Mayoral objectives to deliver affordable housing on their sites there is a need for higher ambition elsewhere.</p> <p>Concerns also are raised with respect to the Private Rented Sector (PRS) specifically houses in multiple occupation. Policy H.6 recognises rise in</p>	
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						<p>popularity of large scale HMOs but does not seek to protect it by any measure such as limiting it to particular locations with suitable access to infrastructure. This means that the limited role of HMOs which cater for single households has potential to displace capacity for development that meets more mainstream need. This affects the mixed and balanced communities objectives and is contrary to sustainable development policy objectives. Therefore LBN questions the Revised Local Plan's soundness in relation to housing and other points of concern impede the delivery of the NPPF objectives.</p>	
PRN.044	R19.0274	C271	Sub Area 2	Para 11.10	LB Newham	<p>The following amendments are proposed: Any planning applications for new non-residential uses within the Sub Area should be located within the Local Centre boundary or, where <u>there is a demonstrable lack of access to similar provision within 400m (e.g. physical barriers) and they are of a small enough scale, be located along key routes, particularly where these are active frontages as identified in Figure 32. Applications of non-residential uses outside of the Local Centre will be supported by evidence of market</u></p>	<p>The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. Further guidance will be provided within the Night Time Economy SPD.</p>

						<u>testing and a marketing and meanwhile use strategy to avoid creation of unlettable ground floor voids.</u>	
PRN.044	R19.0275	C282	Sub Area 3	Para 12.3	LB Newham	Should include reference to supporting the Metropolitan Centre as a whole including that within the LB Newham planning area and public realm that drives convergence between both parts of the Metropolitan centre.	It is considered that the adopted Local Plan and proposed modification MM45 to support the Metropolitan Centre as a whole effectively deals with the coordination and functionality of the centre.
PRN.044	R19.0277	C288	Sub Area 3	Para 12.7	LB Newham	Should insert reference to focussing large-scale town centre uses within the boundary, including that within the planning area of the London Borough of Newham. Correction should be made to the Stratford High Street Policy number and amend reference from diversification to complementing the centre.	The Legacy Corporation is willing to accept the first proposed minor amendment (with some minor alterations) to the proposed change. Please see proposed minor modification MM46: Any proposals for large-scale town centre uses should be focussed within the existing town centre boundary (<u>including within London Borough of Newham's planning area</u>), or where identified as a potential location for expansion. The policy numbering will also be corrected. It is not considered that the second proposed amendment is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan.
PRN.044	R19.0273	C269	Sub Area 2	Policy 2.3	LB Newham	The following change is proposed: Non-residential uses, including A1-A5 and B1a, within Sub Area 2 should be	The proposed change is noted. However, it does not relate to a change proposed to the Adopted

						<p>small-scale, serve localised need and be concentrated within the designated Local Centre. Outside of the Local Centre, proposals for these uses <u>will only be supported where there is a demonstrated local lack of access to similar provision within a designated town or local centre</u>, and should be located along key routes and/or in relation to public spaces, and should be of a scale that will serve the needs of the immediate surroundings or be ancillary to a main use with which it is associated <u>while being mindful of the need to avoid unlettable ground floor voids</u>.</p>	<p>Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. The Draft Night Time Economy SPD will provide further relevant guidance, particularly in terms of approaches to avoiding ground floor voids.</p>
PRN.044	R19.0276	C286	Sub Area 3	Policy 3.1	LB Newham	<p>Additional bullet should be added to make policy justified and effective and in line with NPPF and London Plan: "7. Ensure development contributes to cross boundary convergence of old and new Stratford through new connections and consideration of impacts on the balance and functionality of the whole town centre."</p>	<p>It is considered that the Revised Local Plan and specifically SA3.1 and Policy 3.3 currently support the connections and functionality of the Metropolitan Centre as a whole. However the Legacy Corporation is willing to accept the proposed minor amendment (with some minor alterations) to the proposed change. Please see proposed minor modification MM45: <u>7. Ensure development contributes to the development of new connections to the eastern part of the centre (within the London Borough of Newham planning area) and the functionality of the Metropolitan</u></p>

							<u>Centre as a whole.</u>
PRN.044	R19.0278	C289	Sub Area 3	Policy 3.2	LB Newham	Should make amendments to the wording to state that mixed use proposals along Stratford High Street should complement the existing and planned provision within Stratford Metropolitan Centre as a whole. Remove reference to innovative mixed-use products including shared living where residential and non-residential components are provided as an integrated product focussing on culture and the night time economy at the northern end to Stratford High Street. Wording should be inserted to include appropriate innovative mixed use products including shared living will secure high quality accommodation and ensure ground floor street activation during day and evening.	It is considered that design policies plus the introductory wording to Policy 3.2 which supports only proposals which "demonstrate that it will enhance the character, townscape and function as a lively main street" is sufficient to ensure high quality development and activation in day and night.

PRN.044	R19.0267		Section 4	Policy B.1	LB Newham	<p>A core objective is to increase east London's prosperity through business and jobs growth with emphasis on cultural and creative sectors. LBN are unconvinced that the strategy will be effective to this end. London's economy should not be de-prioritised in the competition of land uses and employment and industrial spaces that allow business uses to grow and evolve continue to be provided. The draft Plan has a rose-tinted view of future needs and the role of employment land, seemingly prioritising lighter/high tech/cultural/creative uses over valuable heavier space extensive industries. Although need for such use is not challenged Newham's evidence base identifies significant demand for warehousing and logistics.</p> <p>Provision for heavier industrial uses is key to sustainable economic growth noting that B.1 promotes locations for and maintenance of employment land it is critical that the plan ensures sufficient protection and creates environments that meet a range of business needs and not just those associated with cultural and creative sectors.</p> <p>It is unclear how heavier and space extensive uses of known demand will be</p>	<p>The approach set out within the policy does give specific protection to B2 and B8 uses (see B.1 (5a) and Para 4.16) and this strategic approach of the policy has not changed considerably since the adopted version. This approach is also in general conformity with the draft New London Plan.</p>
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						<p>accommodated in context of industrial land regeneration. B.1 sets out broad parameters for directing economic growth with proportion of B class uses on SIL the policy needs to ensure heavier uses can be managed and operate in suitable locations including at night without operational threats relating to noise or fumes. Challenge for Newham and London is displacement of industrial and residential hope values have placed pressure on industrial land. Without protection of the LLDC's industrial land there will be knock on effects of businesses moving on. There is presumably the assumption that these uses will be accommodated on SIL elsewhere in /Newham or disappear but the impacts have not been explored and therefore policy is unjustified. LLDC evidence base highlights increasing rents and demand as a key challenge but B.1 incorporates a no net loss principle but does not take it further by addressing operational capacity of floorspace as opposed to quantum only. B.1 (5) allows for re-provision of B2/B8 capacity including yardspace or intensification of employment density across other B class uses. It is inevitably the latter option that is likely to be favourable to developers meaning that the policy could result in increased</p>	
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						<p>densities of lighter industrial uses without securing protection for B2 uses that may exist on a site such as erosion of viable floorspace for such uses.</p> <p>This fails to plan positive for objectively assessed needs will be exacerbated by commitment to longer term SIL release at SA4.5. The plan's approach relies heavily on idea of replacement B class floorspace (unspecified by offer) rather than measures to retain businesses within the area. Para 4.10 confirms that the loss of B2/B8 may be acceptable given the evidenced need and LBN query this approach.</p>	
PRN.044	R19.0272	C41	Sub Area 3	Policy 3.1	LB Newham	<p>The vision for Stratford Metropolitan Centre set out in Policy 3.1 is supported but there is a lack of engagement with how old and new parts of the centre interrelate and complement each other</p>	<p>At the time of production of the Retail and Town centre Needs Assessment (2018) it was understood that the Morgan House permission (14/02289/FUL) was not</p>

					<p>going forward, lacking reference to integration, balanced distribution of new uses. LLDC Retail and Town Centre Needs Study indicates that most retailer demand is from uses more prevalent in older part of the town centre but continues to be a promotion of development on Westfield side including through support for East Bank expansion. There is no acknowledgement in evidence or policy of commitments on LBN side (Morgan House, Stratford Office Village) and the impacts on capacity. Similarly the approach to Stratford High Street outside the centre boundary as set out in Policy 3.2 is not justified by the evidence base in terms of out of centre overspill for night time, culture and leisure uses given the significant floorspace already proposed outside the boundary at East Bank. Approach to address a tricky ground floor environment, the busy road with space of a night time economy designed into new PRS schemes is questionable. This creates management problems including impact from ground floor environment during day on the town centre which is what should benefit from this demand (indeed evidence state over-provision of such uses and how they should be focussed). There is</p>	<p>likely to go ahead and has now subsequently lapsed. Policy 3.2 acknowledges the role Stratford High Street can play in provision of new retail and leisure floorspace, in support of new mixed use development products and is subject to the impacts assessment so is in accordance with the NPPF. This element of the policy is also included within the Adopted Local Plan therefore, it does not relate to a change as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). It also attempts to deal with environmental and amenity issues through the requirement to enhance the character, townscape and function as a lively main street. The Statement of Common Ground and the Duty to Cooperate Background Paper highlight the engagement of policy-making matters that has taken place.</p>
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						<p>lack of consideration of other uses that may benefit from fringe locations such as community and micro-businesses as LBN encourages. Consideration in all cases needs to be made to town centre impacts, impacts on the street environment and residential quality.</p> <p>Therefore LBN consider policies are not justified or effective and risk the health and vitality of Stratford Metropolitan centre as a whole promoting the level of growth for which there is no demonstrable market appetite against NPPF requirements to plan positively for town centres.</p> <p>Local retail/non residential uses outside centres are poorly controlled as evidenced by voids in Chobham Manor and Stratford High Street areas but this approach has not been re-evaluated.</p> <p>Evidence vase indicated limited need for additional retail even in designated town centres therefore policy doesn't seem to be effective or justified in light of experience and is not consistent with NPPF or in general conformity with the London Plan which requires town centres first principle.</p>	
PRN.044	R19.0268	C190	Section 7	Policy T.4	LB Newham	Sets out that Policy T.4 does not fulfil the requirement to manage the	Comment noted. Policy T.4 remains substantially unchanged from that in

					<p>pedestrian and transport hub impacts of proposals for sites where large events generate many visitors at particular times as Stratford becomes more of a 'destination' with high volume venues that result in high impacts on public transport. It is not clear as to the effects on transport of these types of behaviour and the likelihood of frequent disruptions, with unclear consequences e.g. in relation to reduced car usage. Whilst policy T.4 seeks to manage development and transport impacts, it suggests there should be further reference under T.4.4 to highlight the impacts of proposals that generate large numbers of people rather than just car usage. Particularly in relation to capacity at Stratford Station (and subsequent knock on impacts on the wider network). Policies noted do not tackle the range of key issues relating to impacts of proposed development to support core objectives of the plan. Policy T4 is not considered to be consistent with the NPPF, chapter 9 (Promoting Sustainable Transport), where Para 102 states that 'transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed'.</p>	<p>the Adopted Local Plan, with the addition of reference to the London Plan Healthy Streets approach to ensure continued general conformity with the London Plan. It is considered that Policy T.4 continues to provide the appropriate policy tools for ensuring adequate assessment of development scheme proposals and their potential impacts. The existing major facilities such as the London Stadium and other venues already have crowd management and other relevant arrangements in place with these secured through their planning permissions where appropriate. It is expected that other proposals that may have significant transport impacts will be robustly assessed using this and other policies and adequate mitigation measure secured where appropriate and necessary. A Transport Study has been prepared which provides more information on how these matters have been considered as part of the Local Plan review.</p> <p>Policy T.4 sets out a range of requirements in order to ensure that the pressures of new development on public transport, the highway</p>
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						<p>network and other transport infrastructure are mitigated and managed. It includes measures such as target-base Travel Plans and ensuring that new development is designed to include measures that will minimise its impact on public transport. A combination of these measures, site specific requirements and other connectivity improvements set out within the Revised Local Plan are designed to manage the increase of people within the area. Policy T1 and the IDP also refers to the upgrade of Stratford Station which would have a substantial beneficial impact in the context of current and future use and capacity at the station.</p> <p>The policy continues to be considered as a proportionate and appropriate approach to the circumstances of the Legacy Corporation area.</p>
PRN.044	R19.0269	C277	Sub Area 2	SA2.4	LB Newham	<p>The site allocation is very broad in its specification of uses and does not appear to align with / pick up on other policies within the Revised Local Plan. It mentions family homes though as per our other representations the Revised Local Plan does not define family housing or establish a threshold</p> <p>Comments noted. Policy H.1 (Providing for and diversifying the housing mix) sets out detailed definition of the family housing and how this is expected to be delivered within the Legacy Corporation area and would apply here along with the added emphasis on family housing.</p>

					<p>offering. The allocation is for 'mixed use' though no reference to what the uses should be other than 'family housing' are made. While existing uses are noted (D1 / B1 / B8), the allocation makes no reference to the protection of these uses as per other parts of the Revised Local Plan. The allocation also refers to sensitivities to the west and north (under Supporting Development Principles) but inexplicably ignores existing communities to the east.</p>	<p>The site allocation is located on a non-designated industrial site. The intention of the Policy B.1 is to maintain or reprovide employment uses on sites outside the employment clusters and it provides a set of criteria how this should be achieved. The Legacy Corporation is willing to make an amendment, for clarity purposes, to SA2.4 to include reference to Policy B.1.</p> <p>A minor modification MM41 is proposed as follows:</p> <p>MM41: Additional Development Principle – <u>"The amount and type of non-residential use should be determined by applying Policy B.1."</u></p> <p>A further minor modification is proposed to the first Development Principle to incorporate reference to taking account of communities to the east when developing development proposals:</p> <p>MM43: "Minimise impacts on residential amenity from railway line to the west and adjoining community building to the north, <u>and on existing residential</u></p>
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							communities to the east."
PRN.044	R19.0279	C295	Sub Area 3	SA3.1	LB Newham	Should include reference to integration between both parts of Stratford and improved connectivity to eastern side of Stratford via Angel Lane.	It is considered that the Revised Local Plan plus proposed minor amendment MM45 to Policy 3.1: <u>Ensure development contributes to the development of new connections to the eastern part of the centre (within the London Borough of Newham planning area) and the functionality of the Metropolitan Centre as a whole will help facilitate connections and integration of both parts of the centre.</u>
PRN.044	R19.0271		Sub Area 3	SA3.2	LB Newham	East Bank area is identified within the Revised Plan as a priority project providing new homes for Sadler's Wells, BBC Music and the V&A with the Smithsonian as well as UCL and University of the Arts London's London College of Fashion. Objective 1 of the Revised Local Plan in promoting growth in business, jobs and emphasis on cultural and creative sectors with higher education makes reference to East Bank as providing cultural and sporting excellence. SP.1's justification outlines how East Bank will become a new cultural focus to the area providing 5000 jobs by 2036 in academic institution and commercial research space, student accommodation and retail, cultural and education	It is expected that the East Bank and related planning applications will be required to demonstrate and acceptable outcome in terms of density and acceptable residential environment based on the relevant Local Plan policies at the time. The Revised Local Plan has been developed based on evidence from the SHLAA and assessment of housing need. The Housing Explanatory Note will provide further detail in relation to housing delivery and the potential implications of amendments at East Bank. The Revised Local Plan's design policies and the character baseline set by the Characterisation study will also be material to the acceptability

					<p>institutions sectors. The Housing Background Paper forming the evidence base outline that the LCS has been subject to amendments taking into account East Bank proposals would result in net loss of residential floorspace projected originally to be 1400-1500 units. Deed of Variation to the LCS 106 makes a commitment to making up much of this capacity by increasing density in PDZ8 and 12 and LLDC's ownership gives greater delivery certainty. The Revised Local Plan's evidence base should clarify what is possible and acceptable in light of other policies so it is clear in terms of housing numbers to meet OAN. LBN raise concerns over assumption underlying this that it is possible to deliver higher density through development on all plots. Whilst this may be a possible resolution to housing shortfall it is not justified in planning terms in relation to character and local context to ensure strategic approach to delivery of tall buildings which are not harmful to surroundings. Lack of proportionate evidence and analysis of approach questions soundness of position on these sites, in particular need to justify the Revised Local Plan, effectiveness of deliverability and need for meeting OAN and sustainable development objectives</p>	<p>of specific proposals.</p>
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						of NPPF.	
PRN.045	R19.0290	no change proposed	Section 7	Figure 25	Get Living PLC	Discrepancy highlighted in relation to a key connection in Sub Area 2. - GL requests that Figure 25 is therefore updated to change the status of the route from Logan Close through Victory Park.	Comment noted, Figure 25 will be updated as a minor modification accordingly. 'Figure 25 to be updated to change the status of the route from Logan Close through Victory Park.'
PRN.045	R19.0280	n/a	General Comments	General	Get Living PLC	Explains the role of Get Living PLC ("GL") in relation to East Village in Stratford. East Village ("EV") comprises a total of 2,818 homes (all of which are now occupied). Of these, 1,439 comprise Build to Rent ("BtR") units, operated by Get Living ("GL") (a residential owner and rental management company) whilst the remainder, 1,379, comprise affordable homes (both social rent and intermediate units), owned by Triathlon Homes. It falls within Local plan Site Allocation 2.2. A range of retail and leisure facilities also complement EV as part of the overall neighbourhood. EV forms part of the wider Stratford City development and benefits from outline planning permission for a further 2,000 (circa) residential units (under the Stratford City Outline Planning Permission – the "SC OPP"). Most units that remain to be implemented comprise market housing. The challenges that GL have faced include growing the independent retail offer	Comments noted. Responses to specific points raised are provided in relation to the relevant specific proposed changes to the Adopted Local Plan elsewhere in this schedule.

						<p>from inception, against a challenging retail environment and the competition from Westfield, but also establishing EV as a widely recognised, safe, clean and attractive neighbourhood.</p> <p>Identifies the challenges associated with Buy to Rent letting it considers that, the review of the Adopted Local Plan should recognise the need for flexibility to allow current planning permissions to change as priorities and market conditions evolve. Considers it is crucial that any review of planning policies that relate to EV and immediate surroundings provide maximum flexibility and recognise that changing circumstances may mean that a review of proposals could take place on sites which already benefit from planning permission but have not yet been delivered. The ability to implement and realise the type of proposals such as those outlined above, without unnecessary barriers, will ensure that EV can continuously evolve and make an important contribution to delivering more housing, encompassing a diverse mix of residential product in this part of Stratford.</p>	
PRN.045	R19.0281	n/a	General Comments	General	Get Living PLC	Highlights the relationship between the LLDC Local Plan, its review and the draft New London Plan. Considers that the new London Plan may be subject to	Comment noted. The Adopted Local Plan has been reviewed in the context of the draft New London Plan and the Mayor of London has

						further changes as it progresses through its Examination in Public which would need to be taken into account in the review of the LLDC Local Plan.	confirmed that it is considered to be in general conformity with the draft New London Plan. It is also considered that the proposed changes to the Adopted Local Plan provide sufficient flexibility to remain in general conformity.
PRN.045	R19.0289	C168	Section 6	Para 6.28	Get Living PLC	GL fully support the need for an adequately skilled design team. However, GL also considers that it is not the place of the Local Planning Authority (LPA) to control the appointment of a design team. There are a range of factors that can and do influence the appointment of a design team (that go beyond the realms of planning) and for the Local Planning Authority to seek a planning obligation that seeks to control those appointments could frustrate the process and go beyond the LPA's remit.	The wording in relation to obligations to secure adequately skilled design teams is not a specific policy requirement as it is not referenced within the policy itself. The wording in Para 6.28 is clear that there is flexibility in the approach to be followed. Securing the obligation via a S106 agreement will require the agreement of the applicant which means the precise form of obligation can be tailored to reflect the circumstances of individual proposals.
PRN.045	R19.0291	C269	Sub Area 2	Policy 2.3	Get Living PLC	The extent of the proposed primary frontage should reflect those Plots that benefit from detailed planning permission and/or have/are being implemented.	The approach taken has been to show primary or secondary frontages in locations where development has been completed, establishing the use and therefore the extent of the frontage. Where those uses have permission but have not yet been constructed, these have not been included but could be included as part of a future local plan

							review.
PRN.045	R19.0287	C144	Section 6	Policy BN.1	Get Living PLC	Proposed amendments to Part 7 of Policy BN.1 introduce the need for proposals to "...mitigate noise and air pollution". Our interpretation of this is that it requires that development proposals to mitigate any noise and air pollution relevant to a proposed development opposed to noise and air pollution generally. No amendment sought subject to clarity being provided on the interpretation of the policy.	Comment noted. It is confirmed that as written the reference is intended to require mitigation associated with the impacts of the development proposed.
PRN.045	R19.0288	C149	Section 6	Policy BN.4	Get Living PLC	Considers that Part 2 of Policy BN.4 is unjustified on the basis that the status of the LLDC Design Quality Policy in the decision-making process is unclear and should not therefore be included in planning policy. Accordingly, GL considers that reference to the LLDC Design Quality Policy should be removed from Policy BN.4. If reference is to be made to the document, GL considers that it should only be included as supporting text. GL also request clarity as to the planning status of the LLDC's Design Quality Policy. This applies to all references to this document in the revised Local Plan (and any other document that does not have any formal planning status).	It is considered that the wording of the policy is sufficiently clear in respect of the status of the LLDC Design Quality Policy as best practice guidance to justify the inclusion of this reference. This also reflects the similar existing approach within unchanged Policy BN.6 Requiring Inclusive Design, to the LLDCs Inclusive Design Standards.
PRN.045	R19.0282	C71	Section 5	Policy H.1	Get Living PLC	Bedroom mix requirements of over 50% to be 2 bed or more is too prescriptive	It is not considered that the policy as drafted is too prescriptive as it

						and lacks flexibility between sale and Build to Rent. Draft New London Plan states that market and intermediate should not be prescribed. Should remove the 50% requirement for 2 bedroom plus as inconsistent with draft New London Plan.	allows for a 'balanced mix' of 1, 2 and 3 bed dwellings. The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA (2017) and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.
PRN.045	R19.0283	C76	Section 5	Policy H.1	Get Living PLC	Covenant restriction for 15 years is too broad and should be amended to a maximum of 15 years to align with funding lengths for numerous operators and allow for exit should market fail. Clawback reference should be clarified to take into account any foregone planning obligations. Should be amended to "clawback capped at policy equivalent amount".	Although the policy has been amended to make reference to the role of Build to Rent the content of which was previously contained within policy H.7 of the adopted Local Plan which stipulated securing for the long term. Therefore the reference does not relate to a change in policy therefore the amendment is not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.045	R19.0284	C84	Section 5	Policy H.2	Get Living PLC	Amendments are to be consistent with the New London Plan relating to the fast track and viability tested routes and thresholds. Amendments also clarify the tenure breakdown as 60:40 low cost	Para 5.21 sets out the approach of affordable housing on Build to Rent schemes.

						rented and intermediate but no recognition of Build to Rent tenure position. Should align with the London plan and set out where Build to Rent approach.	
PRN.045	R19.0285	C87	Section 5	Policy H.2	Get Living PLC	Mayor has set appropriate income caps for preferred tenures of London Living Rent and London Shared Ownership, and in relation to affordable housing the LLDC will follow the approaches of the 4 London boroughs. This Para should be amended for discount market rent for build to rent to be provided at a range of income consistent with the London Plan. The discounts to market rent should be based on incomes of up to £90k providing more units at levels equivalent to London affordable rent.	It is considered that the approach to Build to Rent is in conformity with the draft New London Plan.
PRN.045	R19.0286	C88	Section 5	Policy H.2	Get Living PLC	For Build to Rent schemes to qualify for the fast track route the tenure should consist entirely of Discounted Market Rent with 60% offered at equivalent to London Affordable Rent, 30% as London living rent and remainder equivalent to other intermediate housing offers. This is too onerous and does not acknowledge the distinct Build to Rent economics and are inconsistent with the London Plan which requires 30% London Living Rent and 70% on a range of incomes. Tenure mix requirements are more onerous than for sale where	The draft New London Plan within Policy H7 sets out that a minimum of 30% of affordable housing should be low cost rented, 30% intermediate products and the remainder to be determined by the local planning authority based on evidence. Therefore Policy H.2 of the Revised Local Plan sets out that in order to be considered for the Fast Track Route the tenure split to be provided should be 60/40 split in favour of low cost rented and remainder intermediate products. These

					<p>income threshold of us to £90k with Discount Market Rent capped at £60k and 60% of London affordable rent levels which will have significant impact on viability and mean schemes won't come forward. Discount Market Rent should be linked to the market as per 2018 NPPF and income restrictions should be linked too. This is not clear if the discount is linked to income of % of market rent. The Viability Study does not test Build to Rent schemes on a proposed rent or yield we consider this needs to be set out in more detail to understand viability assumptions. Consider that the tenure mix requirement for Build to Rent are unjustified and undeliverable on basis on income restrictions being more onerous than for sale schemes. Consider that the Para should be redrafted to align with new London Plan with reference to NPPF 2018 which considers 20% Discount Market Rent to be appropriate on Build to Rent schemes. Tenure mix should be amended to accord with the draft New London Plan at 30% LLR and 70% DMR at a range of discounts. 35% affordable housing on Build to Rent is undeliverable. The Viability study does not set proposed yields or rents which need to be assessed accurately to</p>	<p>intermediate products can be owned or rented products. The supporting text at para 5.21 highlights the tenure split for Build to Rent schemes in order to be considered for the Fast Track Route. This is considered to be broadly in line with that of other schemes which may or may not include London Living Rent. Schemes which do not provide the relevant 35% or 50% affordable housing at the relevant tenure split will go through the Viability Tested Route.</p> <p>The Viability Study tested Build to Rent schemes as 30% London Affordable Rent ('LAR') and 70% London Living Rent ('LLR'); 60% LAR and 40% LLR; and 60% LAR, 30% LLR and 10% DMR at 80% of Market Rents. The draft New London Plan identifies under Policy H13 that for Build to Rent schemes to qualify for the Fast Track Route (FTR) the Mayor expects at least 30% of DMR homes will be provided at an equivalent to LLR with the remainder of the 70% at a range of genuinely affordable rents. On this basis it is considered that the scenarios tested in the Viability Study appropriately test this requirement. With respect to the</p>
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						<p>reflect whether affordable housing and tenure requirements are viable. Unable to comment further without the methodology being clarified.</p>	<p>rents and yield adopted to value Build to Rent units, it is highlighted that these have been set out in Table 4.17.1 of the LLDC's Viability Study. This identifies that a range of rents of £1,400 to £2,700 per month have been adopted. The range of rents adopted reflects the average achievable market rent on different unit types in the LLDC's area and adopted to value the different units in the typology tested.</p> <p>The Housing Delivery Explanatory Note also provides more detail on the approach of the Viability Testing.</p>
PRN.045	R19.0292	C275	Sub Area 2	SA2.2 East Village	Get Living PLC	<p>The development principles should acknowledge that separate planning application(s) could come forward on development Plots that would sit outside of the outline planning permission for Stratford City for a range of uses Site Allocation SA2.2 should show plot N16 as a development parcel.</p> <p>The Local Centre boundary should be extended to include retail uses within the plots N06 and the entire plot N16. Plot N16 should be shown within the site allocation as a development parcel.</p>	<p>It is not considered that the current wording of the site allocation, including the 'Development Principles' require remaining development parcels to come forward in accordance with extant planning permissions. Rather the site allocation and the Revised Local Plan as a whole provide a policy framework against which new applications would be judged.</p> <p>The Legacy Corporation is willing to accept the proposed modification to the centre boundary. This would reflect existing mainly ground floor</p>

							<p>uses.</p> <p>Modifications are proposed as follows: M1: Policies Map Extension of East Village town centre boundary to include retail uses that are being developed within the plots N06.</p> <p>MM40: Illustration map to be amended to show Plot N16 as a development parcel</p>
PRN.046	R19.0293	C237	Sub Area 1	Para. 10.3 Area Priorities	Private individual	The text mentions "distinctive sense of place" but does not explain how this will be achieved. Suggests this needs to focus on distinctive heritage style architecture and enhancing the canal and its biodiversity.	Comment noted. The Revised Local Plan sets out the overall strategy to achieving a distinctive sense of place with a focus on heritage-led regeneration in Hackney Wick and Fish Island and wider policy on enhancing biodiversity. More detailed guidance has also been produced and adopted in the form of the Hackney Wick and Fish Island SPD.
PRN.048	R19.0294	C241	Sub Area 1	Policy 1.1 Managing change in Hackney Wick & Fish Island	Private individual	The northern part of Hackney Wick lacks retail facilities and tends to be isolated from the planned neighbourhood centre. Your plans include minimal expansion of retail outside the neighbourhood centre and the focus on connections seems to concentrate more on East - West links across the canal than North - South links between the older residential areas and	Comments noted. Construction of the new Hackney Wick Station has made the station itself highly accessible and includes an underpass that will provide a highly accessible and safe link as part of a new north-south route through Hackney Wick to Fish Island. This part of the link will be opened once adjacent construction projects allow this to

						<p>the new centre. The development around Hackney Wick station has been disruptive and has made getting around the area on foot more difficult, especially for older people. There needs to be easily accessible and clearly marked routes linking to the neighbourhood centre to encourage especially older residents to access and use these facilities. There also needs to be consultation with residents north of the neighbourhood centre to find out what retail and other facilities they are currently lacking, otherwise the danger is that the development will cater for the residents of the new developments and neglect the needs of the long term residents who could feel even more isolated and ignored.</p>	<p>occur. Policy T9 (includes specific reference to wayfinding and signage such as the Legible London scheme).</p>
PRN.048	R19.0295	C185	Section 7	Policy SP.4	Private Individual	<p>Policy SP.4 does not make reference to the north of Hackney Wick including roads and bus routes.</p>	<p>Comment noted. Policy SP.4 is a strategic policy which covers the area supporting provision of 'Public transport infrastructure and services that will help to deliver the growth objectives set out within the Revised Local Plan'. Several maps show key current connections and connectivity projects proposed or underway throughout the area, including those towards the north in Hackney Wick which can be seen in figure 25.</p>
PRN.049	R19.0296	C201	Section 7	Policy T.9	Private Individual	<p>The Revised Local Plan adopts the London Mayor's targets for active travel</p>	<p>Comment noted. The Draft New Local Plan does refer to the Mayor's</p>

						rather than setting higher targets. QEOP should aim for higher targets to be an exemplar of a healthy community.	targets for active travel and does seek to exceed those through requiring development to maximise opportunities for active travel through the area.
PRN.050	R19.0301	C7	Section 2	Para 3.2	Private individual	Considers that the proposed change from 'Life-long learning' to 'higher education and training' should be reversed, considering the former wording to be much broader and less discriminatory as it would include older people who may no longer be in training or higher education but still have the right to life-long learning. Considers that this would also reflect the legislative requirement to promote well-being.	Comment noted. The change is a correction to this text that had been agreed as part of the examination of the Adopted Local Plan in 2015 but not subsequently made to the text. This change was made to reflect the specific delivery aims in the Adopted Local Plan that are focused on higher education and training and is not intended to imply that life-long learning is unimportant for all. There is no assumption within this that higher education and training is restricted by age.
PRN.050	R19.0299	C146	Section 6	Para 6.13	Private Individual	Support to the addition of 'Where works are proposed within 8 metres of a main river, a separate formal consent will be required from the Environment Agency'	Comment noted.
PRN.050	R19.0300	C144	Section 6	Policy BN.1	Private Individual	Support to the following changes: 4 - the addition of 'and connect habitats to provide wildlife corridors'	Comment noted.
PRN.050	R19.0298	C181	Section 6	Policy BN.17 (formerly BN.16)	Private Individual	Opposition to bringing the waterways back to their historical use by human beings. The waterways are already in use by a wide range of species, including kingfishers, warblers, swallows, house martins and	Comment noted. Policy BN.2 and its supporting text recognise that the waterways are already in use by a wide range of wildlife. The policy sets the requirement that development, that affects the

						<p>dragonflies. The historical use of the waterways as essentially roads was disastrous for wildlife and our new enlightened legal commitments to protecting biodiversity must acknowledge that we do not want to bring back those aspects of the past that had no respect for biodiversity. The less motorised boats travelling the waterways the better for the wildlife that lives there. The waterways are a very important part of the good quality habitat provided by the Park and this must not be threatened. Already, a pub boat - not a heritage feature - that has been erected on Waterworks River has eradicated the colony of warblers that used to breed there. The recent restoration of Carpenters Lock also threatens the warblers and kingfishers that used to use the area. If the canal boats from the lock restoration are allowed to go down the River Lea itself, it could spell the end for the breeding colonies of warblers in the Lea reed beds.</p>	<p>waterway environment, should improve the ecologic potential. Reference to the relevant Biodiversity Action Plan is also required, as set out in Para 6.13 of this policy. Policy BN.3 reinforces this furthermore by a set of criteria that require development proposals to pay full respect to biodiversity by protecting, enhancing and creating new habitats.</p>
PRN.050	R19.0297	C147	Section 6	Policy BN.3	Private Individual	<p>Statement 2 should be: 'Provide a net gain in the extent of good quality habitat suitable for a diverse range of species and/or locally and nationally significant species to thrive.' and Statement 8 should be: 'Ensure that planning applications are accompanied</p>	<p>Policy BN.3 has remained substantially unchanged from that in the Adopted Local Plan, with minor changes proposed as a result of suggestions made during the Regulation 18 consultation, as detailed in the Consultation Report.</p>

						<p>by a Biodiversity Statement facilitating a net gain in biodiversity through any proposals. This statement should be assessed and if true, then verified, by an independent professional ecologist.' Without these changes, the Revised Local Plan will not be compliant with legal obligations relating to the Biodiversity Action Plan. 'Good quality habitat' is too vague on its own; the word 'major' could be subjective and a huge loophole; a biodiversity statement without any need for verification could be completely unfounded - and indeed, is likely to be, if an ecologist has not been involved.</p>	<p>It is considered to be sound in its currently adopted form and with the changes proposed. For Para 2 of the Policy, the change to 'good quality' is considered to provide sufficient flexibility to allow individual development proposals to be judged on their individual circumstances against relevant evidence including the appropriate Biodiversity Action Plan. With reference to Para 8, the requirement being directed to applications for major development proposals is included within the existing, adopted policy and is considered to be a proportionate approach.</p>
PRN.051	R19.0303	C143	Section 6		Private Individual	<p>With the developments going up in East Wick, Sweetwater and Pudding Mill there is less and less space for recreation. There is plenty for families with young children and fantastic sports facilities, where is the less formal provision for teenagers and young adults?</p> <p>Why isn't there a skateboard park under Montfitchet viaduct, pavilions for rollerskating/blading and basket ball courts and street dance Or more formal facilities such as an indoor climbing wall on the north side of the Olympic rings</p>	<p>Comments are noted. The Legacy Corporation area has 107 hectares of designated open space, this includes the parkland of the Queen Elizabeth Olympic Park, the Lee Valley Regional Park and other local open spaces delivered throughout the major developments that have taken place in recent years. Where development is taking place on the Queen Elizabeth Olympic Park, these development locations and development parameters were approved in outline as part of the Legacy Communities Scheme</p>

					<p>hill or bowling for older residents. With all the new development there will no room for music festivals on the park or for fun runs and half marathons.</p> <p>The link to Hackney Marshes needs to be improved and the bridge to the East Marsh reinstated so that festival can take place there and fun runs extended to all weather running paths around the marshes (a sort family path around the East Marsh, a longer one around the West Marsh and combine the two for a serious run beginning and ending in the North QEOP. Some CIL would be needed to create and maintain such a running path.</p>	<p>Planning Permission which was assessed in the context of the playspace and open space provision within the Park and that which is required to be provided within the development areas. Local Plan polices BN.7, BN.8 and BN.9 (formerly BN.6, BN.7 and BN.8) of the Revised Local Plan require protection of designated open and play spaces, their enhancement and the provision of new, high-quality, publicly accessible open and play spaces, while identifying key routes for improvement for example for walking and cycling. Figures 15 (Local Open Space) and Figure 16 (Future Local Open Space) together help to identify current and planned open spaces that will provide recreational opportunities. Furthermore, in line with the evidence prepared, changes to Policy BN.9 (former BN.8) have been made to emphasise the different needs that different age groups may have, particularly young people and teenagers, when designing new open space and recreation opportunities. Specific projects are identified within the Infrastructure Delivery Plan and this is reviewed and updated on a regular basis, with listed projects being able</p>
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							to bid for CIL funding.
PRN.051	R19.0306	C4	Section 2	Para 2.6	Private individual	There is little requirement for social housing, particularly for ageing and disabled residents. The area was built for the Paralympics and is largely fully accessible and step free. There should be a large provision of social housing already adapted for elderly and disabled to encourage older people to mix and share experience with the emerging younger demographic. People are living longer, without a large pool of social housing for elderly and disabled that can be retained as residents pass on the local demographic is going to be skewed to the younger generations.	Comment noted. This change introduces some minor changes to the 'Challenges' section of text that forms part of Section 2 of the Revised Local Plan. This section is intended to set the scene for the strategy and policies within the Revised Local Plan with the issues of affordable housing policy and achievement of a mixed and balanced community are set out within the body of the Revised Local Plan. The approach to affordable housing is set out in Policy H2 and Policy H.3 'Meeting the accommodation needs of older person households.
PRN.051	R19.0305	C6	Section 2	Para 3.2	Private individual	The change says 'establish successful and integrated neighbourhoods, where people want to live, work and play'. Considers that there is little provision for the elderly and disabled. Considers that there should be more provision of social housing with no 'right to buy' and so be passed on in this tenure to future generations. Considers that the present proposals will skew the demographic to the young fit and healthy and will not produce an integrated neighbourhood where all are welcome and mix together. The area should be an exemplar of where people of all ages and abilities can live together.	Comment noted. This section contains the published Legacy Corporation Strategy as agreed by the Legacy Corporation Board and so updates this from the earlier version that was included in the 2015 Plan. As this is reproduced from another document it would not be possible to update this Para.

PRN.051	R19.0307	C78	Section 5	Para 5.14	Private Individual	No provision for social housing for disabled and elderly. Demographics are changing and will become more imbalances as older people move out and younger move in. People are living longer with deteriorating health. Elderly centres should be attached to schools and share common services such as catering. Ground floor properties should be disabled ready as a legacy of the Paralympics. Large pool for disabled people in area would be an exceptional resource for disability innovation hub at Here East.	Revised Local Plan contains policy H.3 which aims at meeting needs for older persons' accommodation and requires the provision of affordable housing in accordance with Policy H.2.
PRN.051	R19.0304	C64	Section 5	Policy SP.2	Private Individual	Change mentions a variety of tenures but does not specify. Affordable housing term is debased and meaningless as it does not take into account pay. Where is provision of social housing for new generations including elderly and disabled?	The affordable housing definitions used are those of the Mayor of London within his draft New London Plan. However for clarification this definition will be added to the Glossary, see minor modification MM64.
PRN.051	R19.0302	C185	Section 7	Policy SP.4	Private Individual	The Revised Local Plan does not mention attempts to integrate with stations towards the north east of the area, such as Leyton or to explore opportunities for potential new stations in the area.	Comment noted. Waltham Forest are the Local Authority within which Leyton Station falls. The Legacy Corporation has worked closely with Waltham Forest and TfL to identify potential for improving transport and connectivity within the area, including capacity. The projects included within the Revised Local Plan have been identified in consultation with stakeholders including TfL, Waltham Forest and

							the other boroughs and through the Legacy Corporation's Transport Study. Where new opportunities have been identified for station or connectivity improvements these have been included within the Revised Local Plan and supporting Infrastructure Delivery Plan and the Infrastructure Delivery Plan list of projects. No projects of the type referred to in this representation have been identified during this exercise.
PRN.052	R19.0308	C237	Sub Area 1	Para 10.3 Area Priorities	Private individual	Please do not go ahead with this (in relation to reference to the Bow Midland West Rail site). It is having a negative impact on the local community, and putting a strain on local resources.	<p>Comments noted. While the representation refers to Change C237, it specifically refers to the site which is the subject of the proposed new site allocation SA4.5.</p> <p>The addition within the Revised Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land. Specific proposals are emerging for the site allocation area and a Screening Opinion has been issued by the LLDC which considers that Environmental Impact Assessment would be required. No specific timetable for</p>

							submitting a planning application has been identified at this point but this is likely to have occurred by the time of the submission of the Revised Local Plan or soon afterward. The prospective applicant is understood to have undertaken some pre-application consultation and there will be opportunity to respond to specific public consultation by the LLDC once a planning application has been received.
PRN.053	R19.0309	C320	Sub Area 4	SA.4.5	Private Individual	Sets out concerns around potential development proposals for the site, following attendance to a consultation event with regards to proposed development on the site, and the impact on local road networks if those proposals were to go forward.	Comments noted. The addition within the draft Revised Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land. Specific proposals are emerging for the site allocation area and a Screening Opinion has been issued by the LLDC which considers that Environmental Impact Assessment would be required. No specific timetable for submitting a planning application has been identified at this point but this is likely to have occurred by the time of the submission of the Revised Local Plan or soon thereafter. The

							prospective applicant is understood to have undertaken some pre-application consultation and there will be opportunity to respond to specific public consultation by the LLDC once a planning application has been received.
PRN.054	R19.0310	C72	Section 5		Private Individual	Change related to renumbering and to be consistent the revised text should refer to 'appropriate forms of residential accommodation'.	It is not considered that the wording as drafted is appropriate or necessary to make the Revised Local Plan sound and therefore it is not necessary to make the proposed amendment.
PRN.054	R19.0311	C71	Section 5		Private Individual	For consistency the 'appropriate mix' change insertion should also be included within SP.2 (C64)	The appropriate mix refers to the mix in order to meet requirements. In accordance with the NPPF, policies need to reflect assessments of needs for housing on basis of size, mix and type (para 61).
PRN.054	R19.0312	C64	Section 5		Private Individual	Not all sites are suitable for a full range of size, accommodation and tenure requirements so should be reworded to state "an appropriate range of...."	It is not considered that the wording as drafted is appropriate or necessary to make the Revised Local Plan sound and therefore it is not necessary to make the proposed amendment.
PRN.054	R19.0313	C236	Sub Area 1	Development Potential	Private individual	Objects to proposed deletion of the text relating to the development potential of the sub area without an appropriate amount of replacement text that includes minimum housing figures and those related to other land uses, appropriate to some sites within the sub area. Whilst a number of schemes	It is not considered by the Legacy Corporation that the inclusion of this text or an equivalent to it is necessary in achieving a sound strategy within the Revised Local Plan for the LLDC area as a whole or Hackney Wick and Fish Island. The Revised Local Plan has an updated

						<p>in this area have planning permission or are under construction we still feel that overall development objectives including housing potential, reflective of the draft London Plan housing targets and our comments on other changes to the draft plan, should be included in the draft plan. Considers that this would assist in maintaining the momentum existing in this sub area and the longer term objectives for optimisation of delivery here and that any housing delivery figure should be expressed as a minimum one to encourage such optimisation.</p>	<p>housing target overall and inclusion of minimum housing figures within site allocations. The Revised Local Plan is therefore considered to continue an emphasis on delivery and encourage optimisation.</p>
PRN.054	R19.0314	C249	Sub Area 1	Para 10.12	Private individual	<p>Considers that the townscape of the area would be improved through a less rigorous application of the approach set out in this new text (which refers to an established prevailing height of 20 metres above ground level, equating to approximately 4-6 stories and the expectation aside from limited variations that development would remain below this level). Further considers that the height and number of storeys appears to assume that buildings will be mainly commercial. It will be possible to achieve 7 storeys within a mixed use building and within a wider range of parameters that would in turn develop much need housing in this highly accessible sub area.</p>	<p>The change introduced here includes the deletion of Policy 1.6: 'Building to an appropriate height in Hackney Wick and Fish Island' and its replacement by the proposed text and proposed new Table 10. There is no change proposed to the overall policy approach to building height within the sub area with this continuing to set the threshold at which the tests within the Tall Buildings policy (BN.5 within the draft Revised Local Plan) are applied. There is also further guidance provided within the Hackney Wick and Fish Island SPD, adopted in March 2018. In conjunction with the proposed updated Policies BN.4 and</p>

						<p>Also considers that the wording of the policy is unclear as to what would constitute a 'limited variation' in building height and that these variations should be positively encouraged as part of the interest in the townscape here.</p> <p>Therefore objects to the approach taken in this proposed change and have concerns that it will frustrate and constraint high quality mixed use developments here.</p>	BN.5 with which this proposed change is linked, this is considered to provide sufficient flexibility and be an appropriate, proportionate and sound approach.
PRN.054	R19.0315		Section 8	Policy S.4	Private Individual	Objection based on the fact that no change has been made to policy S.4 to include modular construction and/or Cross Laminated Timber (CLT) buildings.	Comment noted, however policy S.4 does not favour or exclude any particular construction technique. The policy sets out that 'Proposals for development will be required to demonstrate that they achieve the highest standards of sustainable design and construction'. This could include any construction method that demonstrates such standards including modern methods of construction. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.054	R19.0316	C64	Section 5	Policy	Private	Policy proposes delivering in excess of	The Housing Delivery Explanatory

				SP.2	Individual	the 2161 target however the Para states 22,000 homes expected between 2020-2036 which is less than the Adopted Local Plan. Projection of annual target would see in excess of 30,000 homes, given expectation to optimise delivery should state this figure which means plan is unsound without this.	Note (2019) provides some additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan.
PRN.054	R19.0317	C64	Section 5	Policy SP.2	Private Individual	It will be challenging for sites in area to provide the levels of affordable housing proposed and should be set at lower than the 35 and 50% figures on habitable room basis.	The Revised Local Plan is supported by viability evidence within the Viability Study and the approach to affordable housing thresholds is in accordance with the draft New London Plan.
PRN.055	R19.0319	n/a	Sub Area 1	n/a..	Private individual	Queen's Yard will act as a high-quality public space defined by a mixture of cultural and public uses that complement existing uses such as The White Building and the Yard Theatre. In my opinion Queen's Yard and the area around Grow and Bar 90 don't need much or any further development, they are established and popular places to go out for both local people and beyond and will probably get busier in years to come as the area will be more residential. Existing places such as The Yard Theatre should continue as they are, they are well liked and are doing a tremendous job putting on many vibrant and interesting productions and also club nights.	Comment noted. Queen's Yard and the area around this referred to, including Grow and Bar 90 fall within Site Allocation 1.1 Hackney Wick Station Area, which only has one minor change proposed in comparison to the wording in the adopted Local Plan. This change (Change Reference C250) simply inserts a minimum housing number for the site allocation along with an affordable housing threshold percentage). The Yard Theatre is listed within the Infrastructure Delivery Plan Projects List as a community facility, aiding consideration of its future where specific planning proposals might affect its current site. The site

							allocation area as a whole is also the subject of a resolution to grant planning permission for the outline Hackney Wick Masterplan Scheme (Application Reference: 16/00166/OUT).
PRN.055	R19.0318	C230	Sub Area 4	SA4.5	Private Individual	Sets out and provides context to the challenges of the range of uses around SA4.5 with industrial land, increasing levels of residential development nearby, the Queen Elizabeth Olympic Park and the Bobby Moore Academy school all located in close proximity to the site. Highlights the need for future industrial development to co-exist with other nearby uses is highlighted.	Comment noted. The addition within the draft Revised Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land taking into account the range of neighbouring uses and future development in the area to co-exist and to limit any impact from these neighbouring uses.
PRN.056	R19.0320	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for	Noted

						decades to prevent such change and continue to do so.	
PRN.057	R19.0322		Sub Area 3	Policy 3.1	StopMsgSphere	Policy 3.1 should be amended to remove reference to 'large-scale' town centre use and amended to insert the following: "providing that they do not create any additional pressure on the already stretched public transport network, do not result in any negative impacts on residential amenity of existing and future residents living nearby, do not led to increased noise and disturbance, and do not lead to potential increase in anti-social behaviour and crime ."	Directing large scale town centre uses to the town centres is a key principle of the NPPF and this is not a change from the policy approach within the Adopted Local Plan. Policy T.4 of the Revised Local Plan sets out that "the Legacy Corporation will 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". BN.12 also deals with noise issues including the 'agent of change' principle which would need to be applied to mitigate and manage noise impacts from new development.
PRN.057	R19.0321	C295	Sub Area 3	SA3.1	StopMsgSphere	Represent local residents opposing the MSG sphere and realise this is also promoted by MSG through the Revised Local Plan and have seen the representation which talks about capacity of up to 25,000 spectators. Also seen the GLA comment seeking inclusion of reference to MSG proposal in policy. Realised also beyond time limit and wish this to be accepted. Also wish to take part in the examination and serious concerns are heard. These are set out in attached and also is a	The proposed change is noted. However, the wording 'large-scale town centre use; does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general

					<p>letter to Newham Mayor and Councillors.</p> <p>Not fully versed on the planning process and are an informal group coming together to oppose the proposal which has not yet been submitted. Focussed time and energy on informing local people of proposal and seeking local councillor help. We've found through door-knocking and leafleting that local people in close proximity have no idea about proposal. Therefore discussions have been held behind closed doors between LLDC and MSG as well as Mayor of London for a long time and appears to be a done deal. Given circumstances it is justified to accept late representation and to be heard by an independent planning inspector. Seek changes to site allocation SA3.1 and the insertion of the words 'large-scale town centre use for Development Parcel 2. This should be deleted and replaced with following wording: "Development parcel 2 could provide a small scale town centre use, with the maximum capacity of no more than 1,000 people. Other uses suitable on the site include, but are not limited to: offices, affordable workspace for SMEs and start-ups/"maker space", production space for creative industries,</p>	conformity with the London Plan.
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						artists' studios or similar uses. Any future proposal must not add any additional pressure on the already stretched public transport network. Given that the site is surrounded by housing on three sides, any future proposal must not result in any negative impacts on residential amenity of local residents. Any future proposal must not exceed the heights of the new residential development immediately to the north of site".	
PRN.057	R19.0321	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted

By section

Personal reference number	Representation reference number	Change Reference Number	Section of the Revised Local Plan	(new) Paragraph and policy /other	Organisation/ Company/ Representing on behalf of	Summary	Response
PRN.004	R19.0006	N/A	General Comments	General	Natural England	Natural England does not consider that this revised local plan poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation. The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.	Comment noted.
PRN.010	R19.0016	N/A	General Comments	General	Mayor of Tower Hamlets	Recognises that a number of the concerns we raised in our previous letter have been addressed including on waste consolidation systems, requirements for innovative housing products to deliver affordable housing and support for a modal shift in transport. However, a number of concerns regarding the consultation remain. Reiterates previous comment	The Council's position on the future of planning powers is noted. The <u>Duty to Cooperate Background Paper</u> sets out the mechanisms for cooperation that are in place in detail. It also includes recognition that planning powers will return to the four boroughs at a future date. The LLDC Board, on which each of the boroughs is represented, has

					<p>that it considers it more appropriate for the Legacy Corporation to be de-designated as Local Planning Authority and planning powers handed back to the boroughs. In this context is concerned about the decision to refresh the LLDC Local Plan. In the event that this review progresses it is considered that the policies in the Revised Local Plan should become more aligned with those of the four boroughs rather than adopting the approaches in the London Plan. In particular the Council has concerns about the housing mix and affordable housing approach in the draft New London Plan. It considers that there should be a greater delivery of affordable rented than intermediate homes. Continue to express concern about the approach to waste and in particular to the changes to the Site Allocation SA1.3 Hepscoot Road considering the changes to worsen the position here with the resolution to grant permission for mixed-use redevelopment of the site. Also considers that the Revised Local Plan fails to demonstrate the ability to provide for sufficient school place capacity over the plan period and should use identify sites for provide mechanisms to safeguard school places for the plan period.</p>	<p>initiated discussion on the future of the LLDC. This discussion encompasses planning powers and will lead to more detailed work to set out the mechanism and timing for the return of planning powers. An initial view is that could take place by 2024/25, however the detail and programme for this remain to be discussed and agreed. Given the significant changes to national planning policy and the publication of the draft New London Plan, it is considered appropriate to review and update the Legacy Corporation Local Plan at this point in time to ensure that it remains up to date during the period that the LLDC remains as the local planning authority. Moreover from 6 April 2018, under Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) all local planning authorities must review their local plans at least once every five years from their adoption date.</p> <p>The review of the Adopted Local Plan has been undertaken based on relevant evidence, consultation and engagement. Further explanation is provided within the background</p>
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						<p>papers and consultation report. It is anticipated that the secondary legislation necessary to return planning powers to the boroughs will set out the process for reintegration of planning policy within the LLDC area with this most likely to be through subsequent borough local plan reviews.</p> <p>With regard to the issues raised in relation to aligning policies with those of the four boroughs as opposed to the London Plan, it is noted that section 24(1)(b) of the Planning and Compulsory Purchase Act 2004 requires the Revised Local Plan to be in general conformity with the London Plan.</p> <p>The issues raised around housing, affordable housing, waste and school place delivery are responded to elsewhere in this schedule in relation to the specific changes that are proposed to the Adopted Local Plan.</p>
PRN.013	R19.0067	N/A	General Comments	General	TfL	<p>TfL welcomes the publication version of the document and generally supports the proposals, which makes relevant updates to reflect the draft London Plan and policy initiatives such as Healthy Streets. There are several suggestions</p> <p>Comments noted. Responses to detailed comments are set out against specific proposed changes elsewhere in this schedule.</p>

						for non-material minor wording changes and updates to maps and figures set out in the detail of the response. Recognises joint working with TfL, LLDC, LB Newham and other stakeholders on delivery of an integrated congestion relief scheme for Stratford Station and welcomes references in the draft revised Plan to relevant interventions.	
PRN.015	R19.0094	N/A	General Comments	General	Bellway Homes (Thames Gateway)	States that the NPPF requires all Local Plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. They should be consistent with the principles and policies of the NPPF and should be aspirational but realistic. Para 31 requires all policies to be underpinned by relevant and up-to-date evidence that is both adequate and proportionate, and focused tightly on supporting and justifying the policies concerned, taking into account relevant market signals.	Comment noted.
PRN.032	R19.0177	N/A	General Comments	General	London Borough of Waltham	The Council welcomes the opportunity to work collaboratively with	Comments noted. With respect to the Epping Forest SAC it is noted that

					Forest	<p>neighbouring boroughs to ensure that strategic matters are coordinated across borough boundaries.</p> <p>Officers have attended meetings with particular reference to infrastructure, housing, employment and the environment and have further reviewed the papers sent to us on 16th October in relation to our Statement of Common Ground. Given our attendance there are no further comments we would wish to make on general matters beyond the assumption that matters relating to the Epping Forest SAC have been acknowledged to the satisfaction of Natural England.</p>	<p>Epping Forest Council proposes a 3km inner zone of influence within which contributions will be sought as mitigation for management of visitor pressures. A 6.2 km zone of influence accounting for 75% of visitors (which includes an element of the LLDC area) has been identified but there are no plans to seek mitigation outside of the 3km zone. The Natural England response to the LLDC Local Plan Regulation 19 Draft Revised Local Plan raises no issues in relation to this or other matters.</p>
PRN.034	R19.0185	N/A	General Comments	General	Canal & River Trust	<p>The Trust continues to welcome the LLDC's recognition of the importance of the area's waterways to its character, function and attractiveness as a place to live, work and visit. We agree with the LLDC that the continued enhancement of the waterways represents an important opportunity (para 2.6). Appropriate development alongside our network is key to ensuring that local distinctiveness is maintained. This includes ensuring that landscaping reflects the industrial heritage of the waterways. We, therefore, welcome the ongoing commitment in the same Para to "creating high quality buildings and</p>	<p>Comments noted. The suggested minor modifications are addressed in the context of specific proposed changes to the Adopted Local Plan elsewhere in this schedule.</p>

						<p>places, which have inclusive design and maintain and build upon existing local character".</p> <p>We welcome the recognition of the opportunity (in para 2.6) to continue to build on the existing low-carbon, drainage and other infrastructure, including heating and cooling networks. We believe that the Trust's waterways can play an increasingly important role in this. The Trust does not have any fundamental soundness concerns about the revised LLDC Local Plan. Suggests a number of minor modifications.</p>	
PRN.037	R19.0221	N/A	General Comments	General	St William Homes LLP	<p>Sets out the role of St. William Homes as joint venture between Berkley Group and National Grid Property, having an interest in the Abbey Lane Gas Works site which forms part of Site Allocation 3.6 Rick Roberts Way. Considers that the site has the capacity to make a material contribution to housing delivery and can be delivered within the next five years. Raises concern about the timing of the Regulation 19 Publication draft of the Revised Local Plan in the context of the timings for Examination in Public and final publication of the New London Plan, considering that this presents an opportunity for the Revised Local Plan to be out of step with the New London</p>	<p>Comments noted. The draft Revised Local Plan has been specifically developed to take into account the strategy and policies within the draft New London Plan. The Mayor has also confirmed that the draft Revised Local Plan is in general conformity with the London Plan in this context. It is considered that the proposed changes in the Revised Local Plan remain flexible enough for it to continue to be in general conformity with the New London Plan once it has been published in its final form following the current Examination in Public.</p>

						Plan.	
PRN.040	R19.0242	N/A	General Comments	General	TfL Commercial	Sets out the role of TfL Commercial as a landowner which is separate to that from the functions of TfL as the strategic transport authority in terms of land-use planning and transport policy matters. Identifies the Mayor of London's target for TfL Commercial to commence the development of 10,000 new homes in London by March 2021; at least 50% of these new homes must be genuinely affordable. Has identified a number sites within the LLDC area which could make a significant contribution towards meeting targets. Considers that the Revised Local Plan should optimise those opportunities.	Comments noted. Specific comments on the proposed changes to the Adopted Local Plan are addressed elsewhere in this schedule.
PRN.040	R19.0242	N/A	General Comments	General	Stratford City Business District Limited	Identifies the role of SCBD Ltd as a joint venture between development partners Lendlease and London and Continental Railways. SCBD Ltd is promoting the International Quarter London (IQL), when complete will provide a vibrant mixed-use development comprising office, residential and leisure use, integrated with a high quality public realm. IQL is the main location for Grade A office floorspace in the Stratford City Metropolitan Centre and will provide at least 280,000m ² of office floorspace when fully developed. To date Buildings S5 and S6 are completed and occupied providing 94,030m ² of	Comments noted. It is considered that the Revised Local Plan is consistent with the New London Plan, indicated by the Mayor of London's letter of general conformity, including in the approach taken to reference to the CAZ reserve. Changes to design policy are considered to be proportionate to the context of the LLDC area and to achieving the wider strategy outlined in the adopted and draft Revised Local Plan. It is considered that the changes proposed to the Adopted Local Plan have also been adequately tested in

						<p>office floorspace, with a further 78,452m² consented for Building's S9 and S4. This is supported complementary retail and leisure uses and residential use, with 333 dwellings in Glasshouse Gardens already constructed and occupied.</p> <p>Considers that the Revised Local Plan should be consistent with Draft New London Plan regarding the future potential CAZ reserve designation; There is concern over additional controls on design and procurement; and the Revised Local Plan viability</p>	terms of viability.
PRN.045	R19.0280	n/a	General Comments	General	Get Living PLC	<p>Explains the role of Get Living PLC ("GL") in relation to East Village in Stratford.</p> <p>East Village ("EV") comprises a total of 2,818 homes (all of which are now occupied). Of these, 1,439 comprise Build to Rent ("BtR") units, operated by Get Living ("GL") (a residential owner and rental management company) whilst the remainder, 1,379, comprise affordable homes (both social rent and intermediate units), owned by Triathlon Homes. It falls within Local plan Site Allocation 2.2. A range of retail and leisure facilities also complement EV as part of the overall neighbourhood. EV forms part of the wider Stratford City</p>	Comments noted. Responses to specific points raised are provided in relation to the relevant specific proposed changes to the Adopted Local Plan elsewhere in this schedule.

					<p>development and benefits from outline planning permission for a further 2,000 (circa) residential units (under the Stratford City Outline Planning Permission – the “SC OPP”). Most units that remain to be implemented comprise market housing. The challenges that GL have faced include growing the independent retail offer from inception, against a challenging retail environment and the competition from Westfield, but also establishing EV as a widely recognised, safe, clean and attractive neighbourhood.</p> <p>Identifies the challenges associated with Buy to Rent letting it considers that, the review of the Adopted Local Plan should recognise the need for flexibility to allow current planning permissions to change as priorities and market conditions evolve. Considers it is crucial that any review of planning policies that relate to EV and immediate surroundings provide maximum flexibility and recognise that changing circumstances may mean that a review of proposals could take place on sites which already benefit from planning permission but have not yet been delivered. The ability to implement and realise the type of proposals such as those outlined above, without unnecessary barriers, will ensure that</p>	
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						EV can continuously evolve and make an important contribution to delivering more housing, encompassing a diverse mix of residential product in this part of Stratford.	
PRN.045	R19.0281	n/a	General Comments	General	Get Living PLC	Highlights the relationship between the LLDC Local Plan, its review and the draft New London Plan. Considers that the new London Plan may be subject to further changes as it progresses through its Examination in Public which would need to be taken into account in the review of the LLDC Local Plan.	Comment noted. The Adopted Local Plan has been reviewed in the context of the draft New London Plan and the Mayor of London has confirmed that it is considered to be in general conformity with the draft New London Plan. It is also considered that the proposed changes to the Adopted Local Plan provide sufficient flexibility to remain in general conformity.
PRN.003	R19.0004	n/a	The Early Engagement Consultation Report	N/A	Port of London Authority	The Port of London Authority is satisfied with the responses given to its Regulation 18 representation, as shown within the Early Engagement Consultation Report.	Comment noted.
PRN.025	R19.0138		Section 1	Introduction	London Borough of Hackney	It is recommended that further wording in relation to role and lifespan of the LLDC (and the eventual return of powers back to boroughs) is included in the introduction.	Currently the introduction at Section 1 of the draft Revised Local Plan includes Paras 1.3 and 1.4 which set out information about the Regulations 18 and 19 stage consultation. Once adopted, the final draft of the Revised Local Plan would need to include the replacement of these Paras with text explaining how and when it had been adopted. It is considered appropriate to include minor explanatory text within this

							that would highlighting that the role of the Legacy Corporation is not a permanent one and that planning powers will at a future point return to the four boroughs. This text would likely be along on the following lines as modification reference M2: " <u>The Legacy Corporation as Local Planning Authority is a limited lifespan authority. This Local Plan is the adopted development plan for the purpose of all planning decisions within the Legacy Corporation area until such time as planning powers are returned to the Four Boroughs, and beyond that until such time as it is superseded by revisions to the relevant borough local plans that reincorporate their part of the Legacy Corporation area within those plans</u> ". As this text would be a minor modification to the Revised Local Plan, the final form of this section of text will be confirmed at the time to ensure that it reflects any up to date information on the process and timings around this matter.
PRN.015	R19.0095		Section 1	n/a	Bellway Homes (Thames Gateway)	Identifies that has no comment on this section of the Revised Local Plan.	Comment noted.
PRN.015	R19.0096		Section 2	n/a	Bellway Homes	Identifies that has no comments on	Comment noted.

					(Thames Gateway)	Section 2 of the draft Revised Local Plan.	
PRN.010	R19.0017	C2/C3/C4	Section 2	Our Area	Mayor of Tower Hamlets	Notes the significant change in the nature of the population and economy of the LLDC area since adoption of the Adopted Local Plan. Considers that it would be beneficial for this introductory section to provide more of an analysis of why this change has occurred (for example due to the nature of the new housing stock) and a reflection on how the new Plan addresses these changes. This would help demonstrate the justification for the Revised Local Plan.	Comment noted. This section of the Revised Local Plan, as in the adopted version, is intended to act a brief overview of the LLDC area rather than an in-depth analysis. As a consequence, a greater level of detail is set out in supporting information such as the Spatial Portrait Background Paper and the Population Report: Profile and Forecasts (March 2018).
PRN.010	R19.0018	C4	Section 2	Our Area	Mayor of Tower Hamlets	The inclusion of the word tenure within 'challenges' is supported but consider this should more explicitly reference affordable housing. In addition, in light of the rapidly changing population – maintaining a mixed and balanced community should also be added to challenges. In light of LBTH's housing need, this would ensure the Revised Local Plan is positively prepared to meet our objectively assessed need.	The change introduces the word 'tenure' to the existing bullet point sentence and is intended to embrace housing need overall, including need for affordable tenures. Reference to 'mixed and balanced communities is considered to be a policy aim rather than an additional challenge within the draft Revised Local Plan, for example as referred to within Policy H2 Affordable Housing.
PRN.051	R19.0306	C4	Section 2	Para 2.6	Private individual	There is little requirement for social housing, particularly for ageing and disabled residents. The area was built for the Paralympics and is largely fully accessible and step free. The should be a large provision of social housing already adapted for elderly and disabled to encourage older people to mix and	Comment noted. This change introduces some minor changes to the 'Challenges' section of text that forms part of Section 2 of the Revised Local Plan. This section is intended to set the scene for the strategy and policies within the Revised Local Plan with the issues of

						share experience with the emerging younger demographic. People are living longer, without a large pool of social housing for elderly and disabled that can be retained as residents pass on the local demographic is going to be skewed to the younger generations.	affordable housing policy and achievement of a mixed and balance community are set out within the body of the Revised Local Plan. The approach to affordable housing is set out in Policy H2 and Policy H.3 'Meeting the accommodation needs of older person households.
PRN.050	R19.0301	C7	Section 2	Para 3.2	Private individual	Considers that the proposed change from 'Life-long learning' to 'higher education and training' should be reversed, considering the former wording to be much broader and less discriminatory as it would include older people who may no longer be in training or higher education but still have the right to life-long learning. Considers that this would also reflect the legislative requirement to promote well-being.	Comment noted. The change is a correction to this text that had been agreed as part of the examination of the Adopted Local Plan in 2015 but not subsequently made to the text. This change was made to reflect the specific delivery aims in the Adopted Local Plan that are focused on higher education and training and is not intended to imply that life-long learning is unimportant for all. There is no assumption within this that higher education and training is restricted by age.
PRN.051	R19.0305	C6	Section 2	Para 3.2	Private individual	The change says 'establish successful and integrated neighbourhoods, where people want to live, work and play'. Considers that there is little provision for the elderly and disabled. Considers that there should be more provision of social housing with no 'right to buy' and so be passed on in this tenure to future generations. Considers that The present proposals will skew the demographic to the young fit and healthy and will not	Comment noted. This section contains the published Legacy Corporation Strategy as agreed by the Legacy Corporation Board and so updates this from the earlier version that was included in the 2015 Plan. As this is reproduced from another document it would not be possible to update this Para.

						produce an integrated neighbourhood where all are welcome and mix together. The area should be an exemplar of where people of all ages and abilities can live together.	
PRN.025	R19.0139	C8	Section 2	Vision and objectives	London Borough of Hackney	Reference throughout to 'creative enterprise zone in Hackney Wick and Fish Island' is supported.	Comment noted.
PRN.015	R19.0098	C11	Section 3	Policy SD1: Sustainable Development	Bellway Homes (Thames Gateway)	Supports the principle of delivering sustainable development in accordance with the NPPF to bring about the LLDC's vision for the area.	Support noted.
PRN.015	R19.0097	C6	Section 3	Purpose	Bellway Homes (Thames Gateway)	Considers that it is not clear if the listing of the objectives for the LLDC area is ranked in order of priority or importance; nevertheless, we would not expect the ordering of the objectives to preclude the focus on the delivery of new housing, and to exceeding the minimum housing targets across the area, as intended by the NPPF.	As with the Adopted Local Plan, there is no specified ranking applied to the order of the Objectives within the draft Revised Local Plan. While minor amendments have been proposed to both Objective 1 and Objective 5, overall these remain unchanged and in the same order as previously listed.
PRN.010	R19.0019	C14	Section 3	Vision and Objectives	Mayor of Tower Hamlets	It would be useful to understand what analysis was undertaken to determine which policies are strategic and which not.	The new Para 3.7 sets out the reasoning behind identifying those policies that are strategic, i.e. the test that was applied. New Table 1 sets out lists of both Strategic and Non-strategic policies for clarity.

PRN.015	R19.0101	C24	Section 4	Figure 4	Bellway Homes (Thames Gateway)	Figure 28 identifies a number of employment clusters as part of the economic strategy. The diagram remains schematic and is not clear where boundaries start and end. Long term allocation of sites for employment where no reasonable prospect of coming forward is contrary to NPPF para 120 where applications for alternative uses should be supported where proposal would meet an unmet need. It is questionable whether the proposed allocation meets the rest of soundness and whether allocation of OIL at Cooks Road is based on objectively assessed needs and long term allocation does not meet the objective of sustainable development. Figure 4 should be amended to make boundaries clearer.	It is considered that given that industrial uses are already located on employment cluster B.1b6 Para 120 of the NPPF does not apply. Clear boundary delineations are shown on the Policies Map. Figure 4 sets out the economic strategy.
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PRN.016	R19.0128	C20	Section 4	Objective 1	University College London (UCL)	On behalf of UCL welcome the opportunity to provide comments. UCL is leading university and provides leadership in teaching and research and is ranked among the top universities. It competes on a global scale attracting brightest students. It is essential for world class facilities. A new campus within Queen Elizabeth Olympic Park will be a new model for the community providing world-leading research and education. UCL is working in partnership with LLDC on this which is expected to have up to 4,000 students and 260 academic staff alongside other uses. Provision of teaching and research space are essential components of the ability to attract high quality students and staff as student choices are driven by wider 'experience' of which quality of learning and living accommodation are key. With this in mind UCL has strong interest in planning policy documents. UCL supports change to C20 to highlight promotion of high quality education opportunities.	Noted
PRN.011	R19.0051	C22	Section 4	Para 4.4	GLA	Mayor welcomes potential identification of Creative Enterprise Zone at Hackney Wick and Fish Island which was assessed and announced as successful on 14th December 2018.	Noted

PRN.010	R19.0020	C22 / C28 / C23	Section 4	Para 4.4, 4.5 and 4.8	Mayor of Tower Hamlets	Welcome inclusion of potential Creative Enterprise Zone at Hackney Wick and Fish Island in Local Plan.	Noted
PRN.025	R19.0140	C22	Section 4	Para 4.8	London Borough of Hackney	Promotion of creative, production and cultural industries through Creative Enterprise Zone at Hackney Wick and Fish Island is supported.	Noted
PRN.011	R19.0061	C29	Section 4	Para 4.9	GLA	Revised Para 4.9 should recognise that the draft London Plan identifies the LLDC area as 'retain capacity' area for industrial land and strategic approach is one of no net loss of industrial capacity as set out in E4 (c). Principle of no net loss of industrial capacity should be applied to site allocations where industrial capacity should be retained as part of future development and should not be lost to B1a uses.	The Legacy Corporation is willing to accept that a proposed change could assist in the clarity. Please see proposed minor modification MM8: The Draft New London Plan requires that the Legacy Corporation area 'retains capacity' of industrial land <u>which involves a no net loss of industrial capacity.</u>
PRN.011	R19.0055	C32	Section 4	Para 4.13	GLA	Para 4.13 wording is unclear and should be amended to make clear that large scale office developments over the threshold should consider the provision of low cost business space and affordable workspace.	The wording of Para 4.13 does already refer to the 2,500sqm threshold however the Legacy Corporation is willing to accept that a proposed change could assist in the clarity. Please see proposed minor modification MM10: Proposals of this scale <u>over 2,500 sqm</u> should also consider the provision of space suitable for SME including affordable workspace or low-cost business space, see Policy B.4. Table 4 sets out further detail of the role of each Centre in relation to

							main town centre uses.
PRN.040	R19.0245	C32	Section 4	Para 4.13	Stratford City Business District Limited	Central Activities Zone policy SD4 of draft New London Plan state at part N that boroughs should define detailed boundaries of CAZ satellite and reserve locations. Of same document para 2.4.3 states that these locations are Stratford and Old Oak Common. Minor Suggested Changes document removed this requirement to define these boundaries. The Revised Local Plan has not been updated to reflect this and is out of date with the Strategic Development Plan, therefore definition of the reserved boundary is unjustified and unsound. These references should be removed from Table 4 and Para 4.13 as is inconsistent with London Plan.	The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.

PRN.010	R19.0022	C38	Section 4	Para 4.19	Mayor of Tower Hamlets	Modification states that when designing flexible space within mixed use schemes consideration of relationship between home-based work and dedicated workspace or potential integrated employment and leisure offers may be a factor. Council consider that the inclusion should be reviewed, and live work is not supported in Tower Hamlets given the conversions to residential It is very difficult to implement and enforce which has put pressure on employment floorspace supply in past. Instead welcome proposals that offer a range of uses as separate units within same site. Would welcome clarity that this reference is delivering two uses in one building rather than live/work.	The modification does not refer to or seek to encourage live/work accommodation. The supporting text seeks to ensure that different flexible formats of workspace and a diversity of residential offers are considered in mixed use developments.
PRN.025	R19.0143	C45	Section 4	Para 4.24	London Borough of Hackney	Promotion of Agent of Change principle at para 4.22 is supported.	Noted
PRN.010	R19.0023	C47	Section 4	Para 4.26	Mayor of Tower Hamlets	Support for A5 uses and proximity to schools and in principle the 400m buffer. Note that this is not applicable in Tower Hamlets given density the buffers cover most of the borough. Emerging local plan proposed 200m.	Noted
PRN.025	R19.0144	C47	Section 4	Para 4.26	London Borough of Hackney	Restricting A5 uses to outside 400m walking distances from schools is supported and is line with Hackney's approach. This should also take account of schools across borders.	Noted

PRN.010	R19.0025	C61	Section 4	Para 4.39	Mayor of Tower Hamlets	Change welcomed and acknowledge need for partnership working amongst boroughs to facilitate training and apprenticeships.	Noted
PRN.008	R19.0012	n/a	Section 4	Policy B.1	LaSalle Investment Management	<p>Representations are on behalf of the Old Ford Trading Estate and Maverton Road Trading Estate. The area in which these trading estates are located is industrial although residential and conversions have been delivered adjacently in recent years. Permission was granted for flexible use of Old Ford Trading Estate within classes B1c, B2 and B8. Client's objective is to maintain high occupancy levels in short to medium term and preserve long term commercial viability. It is therefore a priority to maintain the industrial function of the premises to ensure these can continue to meet operational requirements of a broad range of industrial, storage and distribution which will not be compromised by the introduction of residential.</p> <p>Sites are within the Fish Island South SIL and are not allocated but are in close proximity to Bow Goods Yard (SA4.5) which allows for long term residential following industrial intensification for freight use. Client supports strategic policy aspiration to protect and support B2/B8 intensification. But objects to</p>	<p>Although it is recognised that E5 (5) of the draft New London Plan sets out that proposals within or adjacent to SILs should not compromise the integrity or effectiveness of the locations in providing industrial-type activities on a 24 hour basis, if it assists in the clarity and effectiveness of the Revised Local Plan the Legacy Corporation is willing to accept that reference to this is included in new Para 4.14. Please see proposed minor modification MM13: ... <u>Within or adjacent to SILs proposals should not compromise the integrity or effectiveness of the location in accommodating industrial type activities and their ability to operate on a 24-hour basis. For all clusters, where identified within Table 3,</u> residential will be appropriate when the employment-generating potential and industrial floorspace capacity are maintained and amenity and servicing issues have been addressed.</p> <p>It is not considered necessary to</p>

					<p>draft wording as it is not effective or flexible to respond to transformation of the area from industrial to industrial/residential which safeguards intensification of uses within the SIL. The policy intention with respect to release on land on allocated sites for non-SIL uses is towards co-location of uses but wording should be further strengthened to ensure ongoing viability of retaining SIL uses.</p> <p>Client recognises that B.1 recognises and supports the objectives to intensify SIL for industrial uses to support and increase job creation in line with London Plan (2.17 and E5). It seeks to safeguard land within SUL for balance of B class uses but Table 3 restricts the types of uses within Fish Island SIL to B2 and B8 industrial, warehousing, transport and waste management and distribution. Where residential has been introduced it is considered that restricting the cluster to B2/B8 is unjustified and precludes alternative uses within B1c or sui generis such as car or tool hire. Policy should widen the range of industrial uses acceptable in the cluster to ensure objective for SIL is met. Object to B1a2 and should include wider sui generis industrial uses.</p>	<p>include another reference to the Agent of Change Principle as this is already covered adequately but Policy BN.12.</p>
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					<p>In relation to policy objective to facilitate intensification of industrial locations to allow for non-SIL use this should be managed by planning policy. Co-location of uses may lead to units becoming commercially and operationally unviable for B use classes. Recent permissions of Old Ford Trading Estate and Maverton Road Trading Estate imposed additional operation restrictions (delivery hours and noise levels) and is example of how residential proximity can constrain industrial premises and potential financial burden on the landowner/prospective occupiers of the existing and longstanding SIL land. Priority is maintenance of commercial viability for widest range of uses with the ability to intensify. Any future non-SIL uses including those in SA4.5 do not impact on operational capacity of premises and greater than have done. London Plan policy E5 (SIL) states that proposals within and adjacent should not compromise the integrity of effectiveness of these locations in accommodating industrial activity on a 24hr basis. Emerging policy E7 supports intensification in selected parts of SIL and consolidation delivery of residential and other uses (B) however it is recognised that this process must</p>	
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						<p>ensure that industrial activities are not compromised in terms of their continued function, access and service arrangements. 7 day/24hr access is key to the trend and demand for industrial generated by online retail market of next day delivery resulting in associated vehicle movements and distribution, non-SIL uses should not compromise this. Agent of change is further consideration in NPPF para 182 and Policy D12 of emerging London Plan. This places responsibility of mitigating impacts from existing noise and nuisance-generating activities on proposed new noise sensitive development (A). Under (D) it requires development to be designed to ensure that noise and other uses remain viable and continue to grow without unreasonable restrictions being placed on them. Responsibility for mitigation is placed on new development so where placed close to existing noise-generating uses applicants are required to design in more sensitive way to protect new occupiers e.g. residents, businesses, schools from noise and other impacts. B.1 is not consistent with NPPF para 182 and E5 and E7 of the London Plan and it should give greater weight to ensuring that existing employment uses are not</p>	
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					<p>compromised. It should recognise the Agent of Change and take account of existing noise-generating uses in a sensitive manner when new development is proposed. We object to B.1 and amendments should be made.</p> <p>It is proposed that the following wording is added to the end of criterion 3 "Notwithstanding the allocation, proposals that compromise the function, access and overall operation of existing SIL uses and land will be refused". "Proposals should demonstrate an acceptable relationship with the existing SIL uses and ensure that established noise-generating industrial uses remain viable and can continue or grow without unreasonable restrictions being placed on them."</p>	
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PRN.010	R19.0021	C26	Section 4	Policy B.1	Mayor of Tower Hamlets	<p>Council support the application of the sequential test for major office development outside Stratford but question the ambition for CAZ reserve and would like to understand to what extent this envisages a greater quantum of employment provision than currently permitted. Concern that this could undermine Canary Wharf as a satellite as well as supply of housing given the employment protections this would entail. Draft new London Plan is clear that Stratford would only be considered a CAZ satellite in the event of future demand for office space exceeds capacity within the CAZ and the 'CAZ reserve' status is not given any policy weight. There is no evidence to suggest a need for this reserve over plan period given planning commercial floorspace envisaged at Northern Isle of Dogs and City Fringe. Therefore reference in policy is not justified and supporting text would suffice.</p> <p>LLDC is planning on intensifying industrial land within the boundary and protection and intensification is strongly supported particularly in the SIL given under-supply identified in Tower Hamlets Employment Land Review. There is greater emphasis on intensification, consolidation and co-</p>	<p>The CAZ reserve status reinforces the approach for focussing office accommodation within the Metropolitan Centre which is already contained within the Adopted Local Plan. The Combined Economy Study sets out a number of scenarios for the demand for additional B1a office accommodation (of between 26,000sqm and 64,000sqm) over the plan period, the approach taken is, in line with the NPPF to provide for needs identified within the evidence base. These jobs assumptions are also in line with the assumptions included within the London Plan for over 30,000 jobs at Stratford City.</p> <p>The policy approach does not include a requirement for separate access and servicing by residential and industrial uses, any such requirement would be on a case by case basis.</p>
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						<p>location which is supported subject to strict criteria to protect industrial function. Support for consideration of residential amenity and mitigation with any co-location proposals (B,1 (6)). The emerging Tower Hamlets Local Plan requires separate access and servicing for commercial and residential which could be considered as a part of (6), perhaps through a management plan to outline how industrial and residential uses will be managed to reduce conflict.</p>	
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PRN.011	R19.0052	C26, C29 and C 35	Section 4	Policy B.1	GLA	<p>Welcome approach to continued safeguarding and intensification of industrial capacity through consolidation and co-location which reflects London Plan industrial land supply and demand evidence. Approach is consistent with emerging London Plan policies E4-E7 which identify that LLDC should retain capacity. Strategic approach is not entirely about job density and should recognise that some industrial use for logistics and distribution are of particular importance in support for the CAZ but have low job densities.</p> <p>In 2015 36% of London’s industrial land was non-designated and of significant importance to London. Amendments to B.1 should retain B2 and B8 uses in accordance with London Plan E7 which states that mixed use and residential on non-designated land should prioritise retention of existing B2 and B8 capacity through mixing uses or through process of intensification and not merely allowing to change to other B class. Additional capacity for other B class uses will only be welcome on proviso that existing B2/B8 capacity is re-provided or increased and it does not compromise ability of industrial uses to operate effectively. This approach</p>	<p>Noted. The Legacy Corporation is willing to accept that reference to the job densities variations and prioritisation of B2/B8 uses could assist in the clarity of the Revised Local Plan. Please see proposed to new Para 4.14 minor modification MM11: For the purposes of clarity, due to the limited amount of storage and distribution uses within the LLDC area it is not considered that substitution will be appropriate, <u>however such uses are of particular importance in support for the CAZ despite their relatively low job densities.</u></p> <p>An additional modification to new Para 4.14 is also proposed to highlight that proposals within or adjacent to SILs should not compromise the integrity or effectiveness of the locations in providing industrial-type activities on a 24 hour basis has also been proposed. Please see proposed minor modification MM13: <u>Within or adjacent to SILs proposals should not compromise the integrity or effectiveness of the location in accommodating industrial type activities and their ability to operate on a 24-hour basis. For all clusters,</u></p>
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						<p>should be applied to para 4.15 for Hackney Wick and Fish Island.</p>	<p><u>where</u> identified within Table 3, residential will be appropriate when the employment-generating potential and industrial floorspace capacity are maintained and amenity and servicing issues have been addressed.</p> <p>It is considered that the approach within the Revised Local Plan already prioritises re-provision of B2 and B8 use classes, with further explanation in Para 4.16. However for clarification an additional amendment to Policy B.1 is proposed for Bullet 5 (a) to state that re-provision of B2/B8 will only be acceptable 'where appropriate'. See proposed minor modification MM6: Proposals involving a change from B2 or B8 Use Class floorspace (including working yardspace) shall re-provide industrial floorspace capacity within the same use class category or, <u>where appropriate</u>, intensify capacity through increased job densities within other B Use Classes, according to location by applying the town centres first principle; or</p>
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PRN.015	R19.0100	C26	Section 4	Policy B.1	Bellway Homes (Thames Gateway)	<p>Local plans should respond flexibly to market needs and adapt to changing circumstances. To ensure deliverability and flexibility policies should stimulate development of employment floorspace whilst retaining sufficient flexibility to respond to market conditions. There is sufficient flexibility built into the policy.</p> <p>Table 3 identifies the area to the south/south-west of Cooks Road as an Other Industrial Location employment cluster which is supported as a buffer zone to the rest of the Pudding Mill area. Should ensure that industrial uses here do not prejudice delivery of residential where more appropriate (north/north-east). Welcome that Table 3 continues to state that cluster should deliver employment floorspace alongside other uses including residential to aid transition across area. Support intensification of industrial uses which accords with Policy 2.13 of the London Plan (Opportunity and Intensification areas). Proposed mix of uses, including residential, within OIL is welcomed however requirement to protect industrial floorspace capacity for uses identified in table 3 is too restrictive and does not enable these areas to respond flexibly to market demand and changing business</p>	<p>It is considered that: (a) the thrust of the policy has not changed significantly and (b) given that industrial uses are already located on employment cluster B.1b6 Para 120 of the NPPF does not apply.</p>
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					<p>circumstances.</p> <p>Policy B.1 (5) safeguards both non-designated industrial sites and OILs for employment uses appropriate to their designations, stating that proposals for non-compliant uses (ie not in Table 3) or relevant site allocation will not be permitted unless criteria are met. Part 5a however does permit re-provision of B2/B8 through intensification of existing capacity through increased job densities within B class uses which is welcomed. Ultimately long-term protection of clusters is likely to be restrictive and could ultimately preclude promotion of sustainable development in appropriate locations. Policy should recognise that sites should be considered on own merits considering what is deliverable. Policy should be re-worded to allow for managed release of strategic employment sites for other uses where there is an unmet need in line with NPPF. It should enable OIL to respond flexibly to changing market needs. Requirement to maintain existing balance of uses as identified in table 3 or relevant site allocations should be removed. The full range of B class uses and sui generis employment generating uses should be encouraged.</p>	
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PRN.025	R19.0141	C26	Section 4	Policy B.1	London Borough of Hackney	Support for directing large scale offices to Stratford however would like some reassurance that removal of impacts test for offices in excess of 2500 outside would not have negative impacts on other centres. Hackney supports enhanced protection of industrial uses which is in line with Hackney's approach and London Plan's 'retain capacity' of industrial land. It is noted that intensification, consolidation and co-location of industrial is permitted in employment clusters in Table 2. Hackney is proposing similar approach in Priority Industrial Areas in LP33.	The sequential assessment of sites approach set out in criterion 1 directs large-scale office uses to the Metropolitan Centre therefore it is not anticipated that there would be any significant implications of the removal of the impacts test. Should any proposal for major office proposals come forward outside the Metropolitan Centre the Legacy Corporation will continue to work with the boroughs in appropriately assessing the proposal including impacts on the relevant centre hierarchies.
PRN.036	R19.0208	C26	Section 4	Policy B.1	TfL Commercial	Welcome promotion of intensification of industrial land and co-location of business/employment uses with residential. Policies refer specifically to industrial land but there may be similar opportunities for housing and transport infrastructure e.g. over station development at railway and bus stations which should be included in Local Plan. Development typologies would optimise residential development in areas of high transport accessibility in line with draft London Plan Policy D6 and NPPF (102b, 106, 123 and 127) and would support meeting delivery targets. Believe this should recognise opportunities to co-locate transport and residential in over station	The approach to industrial land within Policy B.1 is in general conformity with the draft New London Plan which does not include housing and transport infrastructure. However, the potential for over-station development has been referenced within the Revised Local Plan at para 5.3 and housing policies emphasise that areas of high transport accessibility will be potential locations of higher density development.

						development.	
PRN.036	R19.0209	C26	Section 4	Policy B.1	TfL Commercial	Welcome the policy which directs large-scale office uses towards Metropolitan Centre. TfL is proposing a million sqft office accommodation above the bus station at Stratford which would contribute to meeting 26,200job target for international quarter. Further information to be found in Policy 3.2 representations.	Noted

PRN.044	R19.0267		Section 4	Policy B.1	LB Newham	<p>A core objective is to increase east London's prosperity through business and jobs growth with emphasis on cultural and creative sectors. LBN are unconvinced that the strategy will be effective to this end. London's economy should not be de-prioritised in the competition of land uses and employment and industrial spaces that allow business uses to grow and evolve continue to be provided. The draft Plan has a rose-tinted view of future needs and the role of employment land, seemingly prioritising lighter/high tech/cultural/creative uses over valuable heavier space extensive industries. Although need for such use is not challenged Newham's evidence base identifies significant demand for warehousing and logistics.</p> <p>Provision for heavier industrial uses is key to sustainable economic growth noting that B.1 promotes locations for and maintenance of employment land it is critical that the plan ensures sufficient protection and creates environments that meet a range of business needs and not just those associated with cultural and creative sectors.</p> <p>It is unclear how heavier and space extensive uses of known demand will be</p>	<p>The approach set out within the policy does give specific protection to B2 and B8 uses (see B.1 (5a) and Para 4.16) and this strategic approach of the policy has not changed considerably since the adopted version. This approach is also in general conformity with the draft New London Plan.</p>
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						<p>accommodated in context of industrial land regeneration. B.1 sets out broad parameters for directing economic growth with proportion of B class uses on SIL the policy needs to ensure heavier uses can be managed and operate in suitable locations including at night without operational threats relating to noise or fumes. Challenge for Newham and London is displacement of industrial and residential hope values have placed pressure on industrial land. Without protection of the LLDC's industrial land there will be knock on effects of businesses moving on. There is presumably the assumption that these uses will be accommodated on SIL elsewhere in /Newham or disappear but the impacts have not been explored and therefore policy is unjustified. LLDC evidence base highlights increasing rents and demand as a key challenge but B.1 incorporates a no net loss principle but does not take it further by addressing operational capacity of floorspace as opposed to quantum only. B.1 (5) allows for re-provision of B2/B8 capacity including yardspace or intensification of employment density across other B class uses. It is inevitably the latter option that is likely to be favourable to developers meaning that the policy could result in increased</p>	
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					<p>densities of lighter industrial uses without securing protection for B2 uses that may exist on a site such as erosion of viable floorspace for such uses.</p> <p>This fails to plan positive for objectively assessed needs will be exacerbated by commitment to longer term SIL release at SA4.5. The plan's approach relies heavily on idea of replacement B class floorspace (unspecified by offer) rather than measures to retain businesses within the area. Para 4.10 confirms that the loss of B2/B8 may be acceptable given the evidenced need and LBN query this approach.</p>	
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PRN.015	R19.0102	C41	Section 4	Policy B.2	Bellway Homes (Thames Gateway)	Policy should recognise the opportunities for mixed use development outside centres where harm can be mitigated in context of infrastructure, environmental and town centre impacts. Policy should be amended to reflect acceptability of town centre uses outside main town centres.	Policy B.2 as currently drafted does allow for a mix of uses outside the centres subject to meeting appropriate policy tests.
PRN.025	R19.0142	C41	Section 4	Policy B.2	London Borough of Hackney	Positive promotion of residential uses in town centres is supported in line with Hackney approach. Hackney is promoting mixed used development including residential (not on ground floor) in centres.	Noted
PRN.036	R19.0210	C41	Section 4	Policy B.2	TfL Commercial	Support the broad aims of B.2 and alterations to (6) to allow positive approach to optimising housing locations in area which is in line to previous representations. Policy should however go further to promoted mixed use development residential led in town centres, adjacent to transport infrastructure.	It is considered that the policy allows for residential development in town centres as currently drafted therefore amendments are not necessary.
PRN.040	R19.0246	C41	Section 4	Policy B.2	Stratford City Business District Limited	SCBD supports promotion of complementary residential development in centres to optimise delivery as sought by revisions to B.2.	Noted

PRN.015	R19.0103	C52	Section 4	Policy B.3	Bellway Homes (Thames Gateway)	Supportive of policy principle and opportunities should be taken to enliven underused areas. Careful consideration should be afforded to viability assessments to ensure preparation is not prejudiced by existing use values/alternatives. Appropriateness of interim uses need to ensure they do not conflict with function of allocated used in terms of general amenity, odour, air quality and noise, in accordance with Agent of Change.	Noted. Policy BN.12 deals with the agent of change principle.
PRN.034	R19.0186	C147	Section 4	Policy B.3	Canal & River Trust	No objection to principle of interim uses however should also avoid adverse impacts on and enhance blue and green infrastructure for enjoyment by users. Should add following wording to (6): The uses will have no unacceptable adverse impacts on green and blue infrastructure and their users' enjoyment of them. Where appropriate, enhancements will be required".	The Legacy Corporation is willing to accept the proposed minor amendment to reference amenity impacts more generally. Please see proposed minor modification MM17: 5. The uses will have no unacceptable adverse impacts <u>including</u> on the amenity or function of the existing permanent business or residential community.
PRN.036	R19.0211	C52	Section 4	Policy B.3	TfL Commercial	Support recognition of interim uses in creating vitality however the policy does not recognise that meanwhile sites can play in provision of housing. Provision of modular housing is encouraged by draft London Plan H4. These are of high quality and can be used to meet specific housing needs where permanent development is unlikely in short term.	Para 4.32 includes reference to the role of housing as an interim use.

PRN.010	R19.0024	C56	Section 4	Policy B.4	Mayor of Tower Hamlets	Council supports modifications to B.4 such as terminology update and clarity on 're-provision' of workspace. Still question how policy is effective and implementation of new affordable workspace without triggers or thresholds. Further information on this and how LLDC intend to effectively implement this would be welcomed.	The Legacy Corporation has been applying this policy approach since adoption of the Adopted Local Plan in 2015 and to date circa 18,000 sqm of low cost/affordable workspace has been secured within the area.
PRN.015	R19.0104	C56	Section 4	Policy B.4	Bellway Homes (Thames Gateway)	Inclusion of low cost and managed workspace should be subject to overall scheme viability and should be balanced with delivery of affordable housing and family accommodation.	Noted Policy B.4 sets out that existing affordable workspace or low cost business space shall be retained or re-provided in accordance with Policy B.1 therefore the policy is sufficiently flexible to take account of all other policy requirements.

PRN.025	R19.0145	C56	Section 4	Policy B.4	London Borough of Hackney	Support policy principle which encourages provision of low cost workspace but could require rather than encourage this within new major schemes and state sought proportions and circumstances. Policy could reflect approach in Hackney Wick Masterplan. Hackney requires proportion of affordable workspace in new commercial development at discount rate. Hackney has commissioned study to look at the economic and social value of town centres and designated employment area which is to include assessment of the economy focussing on its places, sectors, workspaces, mapping of sectors to understand characteristics, needs and opportunities as well as value provided to borough. This will support Hackney's affordable workspace policies and may be useful to LLDC and supplementary guidance. Joint work on the Hackney Wick and Fish Island CEZ bid may also provide useful evidence for both authorities in terms of the workspace requirements of cultural and creative businesses. It is useful that the LLDC policy refers to relevant borough's registered workspace providers.	Noted.
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PRN.015	R19.0105	no change proposed	Section 4	Policy B.5	Bellway Homes (Thames Gateway)	Delivery of employment opportunities through construction phase should include reference to viability.	Noted . The policy is sufficiently flexible to allow for other site-specific considerations to be taken into account.
PRN.015	R19.0106	no change proposed	Section 4	Policy B.6	Bellway Homes (Thames Gateway)	Welcome identification of Pudding Mill as area suitable for higher education, research and development but should define higher education.	Noted. Standard definitions of higher education are utilised however the Legacy Corporation is willing to accept the proposed minor amendment to insert a definition in the glossary. Please see proposed minor modification MM66.
PRN.015	R19.0099	no change proposed	Section 4	Policy SP.1	Bellway Homes (Thames Gateway)	Support principle of strong and diverse economy to transform east London however it is important that the objectives of local plan remain deliverable and should not be too onerous prohibiting new buildings in sustainable locations.	Noted
PRN.011	R19.0050	C25	Section 4	Table 2: Direct jobs from proposals	GLA	Table 1 estimates provision of 55,000 jobs to 2031 and the current London Plan identifies Stratford as the strategic office centre beyond central London with capacity for 50,000 jobs including 30,000 office jobs at Stratford City. In relation to the potential CAZ extension at Stratford, the Mayor is please that office generating uses will be directed there in accordance with draft London Plan para 2.4.3. Draft New London Plan E1 identifies Stratford as location for CAZ-type office functions.	Noted

PRN.034	R19.0187	C39	Section 4	Table 3	Canal & River Trust	Support for B.1a3 but question why other employment allocations do not include similar test of impact on environment and amenity given that other employment site allocations also include support for intensification.	This wording has been included to be consistent with that of the site allocation for that particular site (SA4.5)
PRN.014	R19.0093	C39	Section 4	Table 3 – B.1a1	Here East	Here East supports changes to Table 3 which reflect diversity of uses curated at the campus. Changes also recognise the opportunities for intensification and redevelopment of under-utilised areas will be supported. Seeking to optimise the use of land this is considered to positively prepare the effective approach to supporting future potential development at Here East. To clarify the mix of uses it should be amended to “A range of complementary employment uses within B1 and B8 Use Classes, D1 and further and higher education uses, including [...]” Welcome the continued development of the Local Plan and amendments which have been incorporated to date to reflect the ecosystem of the campus. As Here East continues to fill opportunities for intensification and redevelopment are recognised and amendments proposed through representation shall be required to ensure plan is positively prepared and effective in delivery. Trust this is clear but happy to engage further.	The Legacy Corporation is willing to accept the proposed minor amendment to include reference to higher education to the proposed change to assist in clarity. Please see proposed minor modification MM14: A range of complementary employment uses within B1 and B8 Use Classes, D1 and <u>higher</u> /further education uses, including creative and technology-based industries, light industrial, offices, research and development, media, broadcasting and production uses, culture/arts and smaller workshops. Also including supporting uses of conference facilities within D2 Use Classes, and small-scale retail and leisure.

PRN.001	R19.0002	C39	Section 4	Table 3, B.1b5 Wick Lane and Crown Close	Private individual	Crown Close is public highway currently being used for industrial purposes without planning consent so should ensure this is stopped with immediate effect. Warehouses next to 616 are causing nuisance and encourage crime. This makes it unsafe and is incompatible with residential properties. The land should be pre-designated to residential or mixed use as any warehouse space is inappropriate.	This does not refer to a change proposed to the Adopted Local Plan. However planning enforcement officers have been made aware of the complaint.
PRN.008	R19.0014	C39	Section 4	Table 3, B. 1a2	LaSalle Investment Management	<p>The character and nature of the Fish Island South SIL cluster is changing that restrictions are being placed on client's sites. Client wishes to ensure these are lettable and viable but it is becoming increasingly challenging particularly the potential for future intensification.</p> <p>Draft New London Plan introduces a new and creative approach to intensification and co-location of industrial but this approach needs to be tested in the market, i.e. not aware of any successful letting of multi-storey industrial with residential uses excluding student accommodation. B1 Table 3 B1a2 allows non SIL uses to be introduced within the cluster where non consolidated and intensive high quality industrial are provided through the development of multi-storey schemes and more efficient plot ratios.</p>	The approach of the policy has not been significantly amended and is considered to be in conformity with the London Plan which places the LLDC area in the 'retain capacity' category therefore protection of the SIL and the industrial functions contained therein is necessary.

					<p>Object to the current approach to transforming the cluster because limited consideration given to function of the area ie to safeguard and intensify B1c, B2 and B8 and how changes and proposed new allocation will impact on the remaining SIL sites and their future redevelopment. Principle of plan-making in the NPPF is to ensure plans seek opportunities to meet development needs of the area and are flexible to change. The policy framework does not take account of the changes that have already taken place and proposed in the plan which could make intensification of B1c/B2/B8 unviable or undeliverable. Policy should introduce a mechanism to review the function of the SIL and deliverability of B1c/B2/B8 to facilitate a scheme coming forward. Current approach to safeguarding and intensification is not justified and could stifle development.</p> <p>Support for strategic approach to protect and support industries of trading estates object to B.1 as not justified, effective of consistent with national policy. SA4.5 and B.1 have potential to compromise the function of the client's site in the SIL unless a policy requirement to protect the existing uses is incorporated. Blanket approach to</p>	
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						safeguarding site by virtue of the SIL designation is not justified or deliverable bearing in mind changes in area that have taken place.	
PRN.011	R19.0053	C39	Section 4	Table 3, B. 1a1	GLA	Table 3 gives Here East a sub category of SIL designation which recognises that the area is occupied by modern development comprising of a variety of businesses, education and leisure uses. While these diverge from E4 of the London Plan it is considered that the development and infrastructure of the site would allow SIL uses to occur. Given loss of SIL in London over 10 years Mayor considers SIL designation maintains importance of preserving industrial uses and longer term role as reservoir for London. Should make clear priority is retention of industrial capacity and such uses can support existing site functions.	The Legacy Corporation is willing to accept the proposed minor amendment to Table 3, B.1a1 to make clear that the priority is retention of industrial capacity. Please see proposed minor modification MM12: ... <u>At this location the priority will be retention of industrial capacity, including uses which support existing site functions.</u>
PRN.001	R19.0001	C39	Section 4	Table 3, B1a3 Bow Goods Yard	Private individual	Bow Goods Yard is not appropriate for waste management uses and should be removed. It should reflect the fact that SIL land can also be used for non-industrial or related uses and should be resisted other than as part of a strategically coordinated process of consolidation or where it addresses a need for accommodation for SMEs or emerging industries. This site should be used for creating new innovative technologies and not old Victorian,	The proposed change to remove reference to waste management uses is noted. However, as this wording was included within the Adopted Local Plan it does not relate to a change as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan

						pollution causing industries. There is no place for concrete factories, tarmac or was management 100m from residential.	sound or compliant with national planning policy or achieve general conformity with the London Plan. Bow Goods Yard is a designated SIL and in accordance with the London Plan are preferred locations for general industrial activities including waste management (see 2.17, E5)
PRN.040	R19.0244	C25	Section 4	Table 4	Stratford City Business District Limited	Part N of SD4 (Central Activities Zone) as published in December 2017 of the new draft London Plan states that the detailed boundaries of CAZ satellites and reserve location should be set out for Stratford and Old Oak Common. However the minor suggested changes in July 2018 removed this requirement and the Local Plan has not been updated with this respect so is out of date with the Strategic Development Plan and is unsound. References to CAZ reserve in Table 4 and Para 4.13 should remove these references to be sound.	The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.
PRN.011	R19.0049	C17	Section 5		GLA	All development plan documents must be in general conformity with the London Plan under the PCPA 2004. TfL has also provided comments which are in Annex 1. Letter sets out where some amendments may be required to ensure	Noted.

						more in line with London Plan and draft New London Plan. The draft New London Plan was published in December 2016 and in August 2018 some minor suggested changes were made. The examination will commence in January 2019 with adoption anticipated winder 2019/2020. This will form the Development Plan and LLDC Local Plan must be in general conformity with current Plan but policies which diverge from new plan will become out of date as the new London Plan gains more weight. So draft New London Plan and evidence base are now material considerations.	
PRN.025	R19.0146		Section 5		London Borough of Hackney	Supportive of housing policies. LLDC to deliver excess of the 2161 pa target. Of this 162 will be in LB Hackney.	Noted.
PRN.030	R19.0161		Section 5		Home Builders Federation (HBF)	Local Plan is unsound as it is not positive prepared and ineffective. There is inadequate information on housing land supply. At para 5.3 the LLDC state that it is unable to identify an adequate land supply for the period from 2028/29 and it is unclear what the land supply actually is for period 2020/21-2028/29. The Sites Report 2018 identifies several sites some allocated some not. It does not include a breakdown of estimated site yields and trajectory for delivery of allocated sites. Without this information it is hard for third parties to scrutinise	There is no specific requirement to provide annual delivery information for each identified site within the Revised Local Plan. Instead, in combination the Revised Local Plan provides a housing trajectory and the Sites Report provides information for allocated sites. The housing trajectory includes anticipated capacity from other sites in addition to the allocations and further information and explanation is provided within the Housing Delivery Explanatory Note (2019).

					<p>the housing land supply. This is central to soundness of local plan and have been unable to locate a five year housing land assessment detailing the sites that contribute to it.</p> <p>LLDC cannot rely on the GLA SHLAA as evidence for housing land supply because as identified in this document at Para 1.5 the SHLAA cannot allocate sites. It only identifies a notional capacity for each local authority planning area and it is the responsibility of each local authority to undertake detailed local assessments and allocate sites. Therefore sites should be allocated to deliver 21610 homes over 10 years. Noted in the Housing Background Paper this includes information on capacity of key sites but does not breakdown what has been delivered and what completions are expected over the plan period. This should be included in a trajectory plan for each site by year and key site.</p> <p>The figures for the key sites are indicative and actual rate they will be built out will be for discussion with landowners and developers concerned. LLDC should explain planning status of its allocations including whether it has</p>	<p>This will include further information on which sites have planning permission and when it was received. In relation to the small sites figure this has not been included within the first 5 years but there are measures within the Revised Local Plan to review progress on this. The Housing Background Paper (2018) sets out at Para 5.4 how the NPPF requirement to identify small sites for 10% of housing delivery has been met.</p>
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					<p>full permission and date received. Appendix 2 includes sites but we are confused about the pre-adoption period of 2018/19 as this is not part of planning period and should not be counted towards the target. This also breaks down delivery into 5 year blocks, while helpful this should also be broken down by each identified and allocated site by each year. This should also be totalled with small sites assumptions so it makes the total of 21610 completions by the end of the plan period.</p> <p>HBF has strong reservations about the small sites component of the draft New London Plan as it lacks credibility. This modelled a theoretical capacity of circa 18790 net additions per year but trends from small sites yield much less than this just 12940 on a average for 12 years. Mayor has also added a separate windfall allowance but HBF argue this has already been counted as part of the 12 year trend. This will be one of the key areas of conflict in the London Plan EIP. Although this generates a low figure for the LLDC at 80 dwellings per annum the effectiveness of policy H.2 will need monitoring. If these do not materialise in the first 2 years of the London Plan and Revised Local Plan it will be necessary to undertake an</p>	
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					<p>urgent review of strategic and local plans. It is noted small sites assumptions have only been factored in for years 6-10, this seems sensible to allow the approach to 'bed-in'. We note the additional capacity category in the Background Paper which has potential to yield 2036 homes based on the characterisation study undertaken by LLDC and broad locations to yield residential capacity from small sites. Instead of hoping these materialise they should identify specific sites and allocate them.</p> <p>The NPPF requires local authorities to identify small sites no larger than 1ha to accommodate 10% of the housing requirement (LLDC=2161). Mayor small sites equals 800 homes in sites of 0.25ha or less. The LLDC should therefore identify other sites of up to 1ha to meet the requirement for 1361 homes to be met. Rather than relying on the Mayor's theoretical assumptions LLDC should identify small sites for each year of the Revised Local Plan equivalent to 10% of the housing requirement. The Revised Local Plan should be a 10-year plan therefore sites of 0.25ha for 2610 homes should be identified. On this basis the Housing</p>	
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					<p>Background Paper has permissions and allocated site to support 20871 homes.</p> <p>LLDC is in a relatively strong position albeit short of the overall requirement, with a shortfall of land for 739 homes. LLDC should identify sites for full requirement to be delivered by 2029/30 and concern that too much reliance is placed on non-identified sites to achieve the target.</p> <p>As plan commenced in 2020 there is no deficit that needs to be factored into the 5 year land supply calculation therefore the requirement is 10805 (2161 x 5) plus a buffer of 5% for 11345 homes. On basis of information provided in the Background Paper the LLDC has permission, allocations and broad locations for 12067 homes and is able to demonstrate a 5 year land supply, but reservations about the reliability of the 'additional capacity' and whether it will yield the required number of homes. Performance of LLDC against this will need to be closely monitored and there is no information of the sites in question but other parties may have different view on delivery and capacity of sites.</p>	
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PRN.037	R19.0222	C9	Section 5		St William Homes LLP	<p>Whilst the commitment to review the Revised Local Plan in the context of the draft New London Plan is welcomed the timing could result in the submitted plan being out of step with the London Plan as finally published if substantive changes are made to this in particular employment land and affordable housing. Draft New London Plan raises a number of matters including loss of employment capacity, transposing affordable housing policies set out in SPG, setting prescriptive development management policies, removal of density matrix and new design-led approach and increasing housing requirements to be delivered in outer London boroughs.</p> <p>Table 4.1 of draft New London Plan sets 10-year targets for net housing completions split per borough. LLDC is expected to deliver 21610 homes between 2019-2020 and 2028-2029 at an average of 2161 per annum. The Revised Local Plan responds with this on a pro-rata basis until the end of the plan period however the London target could increase which given land availability could be more in LLDC area than boroughs.</p> <p>New London Plan policies in relation to</p>	<p>The proposed changes in the Revised Local Plan have been drafted to specifically take account of the policies within the draft New London Plan. Timing of the New London Plan EiP and the Examination of the Revised Local Plan are likely to be such that, where necessary any relevant changes to the new London Plan can be taken into account in order for the Revised Local Plan to continue to be in 'General Conformity' with the New London Plan.</p>
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						<p>employment capacity and affordable housing will have a fundamental impact on housing delivery and as yet panel's recommendations are unknown which would need to be reflect on the Revised Local Plan and may go beyond scope of minor modifications. Therefore would suggest submission is delayed pending receipt of examiners' report to the Mayor.</p> <p>Terms of new NPPF will be effective for the Revised Local Plan examination. This introduces introduction of standard method for calculating housing needs and housing delivery test, viability appraisal and revised affordable housing provisions in particular in relation to Build to Rent.</p>	
PRN.043	R19.0266	n/a	Section 5		Unite Students	Appendix showing comments made to the draft New London Plan submitted.	Noted.
PRN.044	R19.0270		Section 5		LB Newham	<p>The following are the London Borough of Newham's principal concerns with regard to housing policies. Objective 2 sets out target of 22,000 new homes between 2020-2036. SP.2 highlights importance of providing full range of identified size, accommodation and tenure requirements including family housing in all tenures, specialist housing products and mix. This is also highlighted in policy H1 in terms of securing a mix of accommodation types.</p>	<p>The borough Strategic Housing Market Assessments were considered within the Housing Requirements Study (2018). It is considered that the policy approach strikes an appropriate balance between local and strategic requirements.</p> <p>Alike the New London Plan the glossary defines family housing as units of 3 or more bedrooms. The</p>

					<p>However despite the extensive Housing Requirements Study (HRS) evidence on housing need is taken from the GLA SHMA and does not reconcile this with the Outer North-East London SHMA and that of neighbouring boroughs.</p> <p>Failure to sufficiently account for this wider evidence has delivery implications for full range of identified size, accommodation and tenure requirements. This ties in with need to create mixed and inclusive communities alongside sufficient infrastructure as outlined within section 5.</p> <p>The Housing Background Paper states a balanced mix approach of the Revised Local Plan has been informed by size requirements of HRS and SHMA and that of the boroughs identifying a greater need for 3 bed homes (Newham and Hackney). At para 5.11 it is stated that 2 bed plus properties should exceed 1 beds and should show how family accommodation is maximised. Whilst this satisfies the GLA's SHMA need and the HRS it does not go far enough for the Outer North East London's SHMA for 3 beds at 64%, so more emphasis on 3 beds is encouraged together with target for all proposals as is detailed on low cost rents.</p>	<p>principle of mixed and inclusive communities is a key consideration of the Revised Local Plan as a whole and a number of the site allocations specify where family housing is considered a priority (e.g. SA4.3, SA2.1, SA2,2 and SA2.3). The four boroughs have been engaged throughout the process of evidence-base preparation from commencement in 2017 and London Borough of Newham have signed a Statement of Common Ground which includes matters related to housing.</p> <p>The approach to affordable housing and the requirement to calculate on a habitable rooms basis is in conformity with the approach set out within the draft New London Plan. In practice by unit and habitable room calculations are often made on applications. Policy H.7 deals with shared living proposals and this does direct such proposals to particular locations, i.e. the Metropolitan Centre and the policy also states that schemes will need to relate positively to mixed and inclusive neighbourhoods.</p> <p>As above the Legacy Corporation is</p>
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					<p>There is no explicit definition of family housing questioning how this will be implemented with no guidance on acceptability of studios in meeting housing mix requirements. Not expressed how family housing requirements are to be balanced against infrastructure and affordable housing provision in viability terms. This has implications on achieving sustainable development objectives across Newham and LLDC area generally with regard to mixed and balanced communities and infrastructure support. Additional engagement on local authority needs would help address this which questions how the Revised Local Plan has been positively prepared informed by agreement with other authorities and its likely effectiveness. Clear tests have not been satisfied in engaging with existing evidence of the boroughs to ensure a joined-up approach in delivering national policy objectives relating to sustainable development.</p> <p>SP.2 seeks a minimum target of 35% across the area applying the Mayor's threshold levels of 35 and 50% on habitable room basis. It also sets out a 60/40 low cost rented/intermediate split as commitment to applying</p>	<p>willing to accept the proposed minor amendment to add clarity that 50% is the Mayor's strategic target for London and when the 35% and 50% threshold approach apply.</p> <p>Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a <u>strategic target of 50% affordable housing across London. The Legacy Corporation will apply the Mayor's</u> an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity</p>
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					<p>Mayor's fast track and viability tested routes and thresholds. This is not accompanied by any analysis of whether these would have most local benefit relying only on the draft New London Plan approach. The Newham Options Appraisals modelled these alternative approaches and how they would play out in practice, and the results demonstrated that on a unit basis yielded higher levels of affordable housing. Such modelling would provide a more robust justification of targets used and the approach is justified in terms of maximising affordable housing delivery.</p> <p>There is also over-reliance on public landowners to deliver affordable housing as set out within Para 5.5. The requirement of 50% on publicly owned land is discussed in Background Paper and dependence on these to compensate for under-delivery across the area disregards the mixed and balanced communities objectives promoted in plan. Whilst LBN recognise Mayoral objectives to deliver affordable housing on their sites there is a need for higher ambition elsewhere.</p> <p>Concerns also are raised with respect to the Private Rented Sector (PRS)</p>	
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						specifically houses in multiple occupation. Policy H.6 recognises rise in popularity of large scale HMOs but does not seek to protect it by any measure such as limiting it to particular locations with suitable access to infrastructure. This means that the limited role of HMOs which cater for single households has potential to displace capacity for development that meets more mainstream need. This affects the mixed and balanced communities objectives and is contrary to sustainable development policy objectives. Therefore LBN questions the Revised Local Plan's soundness in relation to housing and other points of concern impede the delivery of the NPPF objectives.	
PRN.054	R19.0310	C72	Section 5		Private Individual	Change related to renumbering and to be consistent the revised text should refer to 'appropriate forms of residential accommodation'.	It is not considered that the wording as drafted is appropriate or necessary to make the Revised Local Plan sound and therefore it is not necessary to make the proposed amendment.
PRN.054	R19.0311	C71	Section 5		Private Individual	For consistency the 'appropriate mix' change insertion should also be included within SP.2 (C64)	The appropriate mix refers to the mix in order to meet requirements. In accordance with the NPPF, policies need to reflect assessments of needs for housing on basis of size, mix and type (para 61).
PRN.054	R19.0312	C64	Section 5		Private	Not all sites are suitable for a full range	It is not considered that the wording

					Individual	of size, accommodation and tenure requirements so should be reworded to state "an appropriate range of..."	as drafted is appropriate or necessary to make the Revised Local Plan sound and therefore it is not necessary to make the proposed amendment.
PRN.043	R19.0264	n/a	Section 5	General	Unite Students	<p>On behalf of Unite Students the leading manager and developer of student accommodation. Unite recognise provision of PBSA contributes to meeting housing need as it alleviated housing needs by increasing availability of larger family size dwellings and new provision. This is in accordance with the NPPG and NPPF which states local planning authorities should plan for sufficient student accommodation whether it consists of self contained or halls or residents, on or off campus. Encouraging more dedicated student accommodation may provide low cost housing taking pressure off private rented sector and increase stock. London Plan Policy 3.8 states strategic and local requirements for student housing meet a need in locations with good transport access. Draft policies of New London Plan includes a policy on this H17 which states that boroughs should seek to ensure need is addressed at neighbourhood level, where secured for students, for occupation by members of an organisation, at least 35% secured as</p>	Policy H.4 is considered to be in general conformity with the draft New London Plan and Para 5.28 confirms that new student accommodation can contribute towards the supply of housing.

						affordable and where has functional living space and layout. It also states that student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well connected to local serviced by walking, cycling and public transport away from existing central London concentrations as part of regeneration and redevelopment schemes. It also recognised that PBSA all contribute to London's need and is not in addition to conventional need. Three bedrooms equate to one conventional housing unit and meeting housing targets on the same ratio. Therefore encouraged LLDC to review and update policies to be more flexible and recognise how PBSA contributes to overall housing need and support mixed and balanced communities.	
PRN.010	R19.0027	C68	Section 5	Para 5.5	Mayor of Tower Hamlets	Build to Rent to meet affordable housing requirements is welcomed.	Noted.
PRN.010	R19.0029	C74	Section 5	Para 5.10	Mayor of Tower Hamlets	Welcome consideration of borough SHMAs in the Housing Requirements Study however population approach (model 4) as household projections is concerning as replicates sub-optimal housing mix and does not respond to need in wider area. Population has changed rapidly reflecting new housing but this has only achieved 22%	The projections contained within the Population Forecasts factor in housing mix policy requirements including that of affordable housing.

						affordable and lower amounts of family housing. This projects forward this household composition and need therefore not sound. Greater weight should be given the SHMAs and seek greater proportion of affordable housing.	
PRN.011	R19.0058	C75	Section 5	Para 5.11	GLA	H12 states should not set prescriptive dwelling size policies by bedrooms for market and intermediate. Should provide need by bedrooms to ensure affordable housing meets needs so should apply the half units having more than 2 bedrooms requirement flexibly where required.	<p>It is not considered that the policy as drafted is too prescriptive as it allows for a 'balanced mix' of 1, 2 and 3 bed dwellings. The policy itself sets out that schemes should contain a mix of 1, 2 and 3 bedroom properties, and that more than half of the total should be 2 bedroom plus. Paras 5.10 and 5.11 set out that there are particular identified needs for 2 bedroom homes within market and affordable sectors, 3 bedroom affordable homes and low cost rented 1 beds. Crucially it also states that site specific circumstances will be key considerations in determining mix and a number of site allocations highlight where family housing (3 bed plus) are particularly sought (eg SA2.1, 2.2, 2.3, 2.4 and 4.3), therefore the plan has an additional level of flexibility in this.</p> <p>The policy as currently drafted is supported by evidence within the Housing Requirements Study and the</p>

							GLA SHMA (2017) and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.
PRN.040	R19.0249	C76	Section 5	Para 5.12	Stratford City Business District Limited	Covenant restriction for 15 years is too broad and should be amended to a maximum of 15 years to align with funding lengths for numerous operators and allow for exit should market fail. Clawback reference should be clarified to take into account only forgone planning obligations and is capped at policy compliant level of affordable housing if considered as a for sale scheme. Needs this to be effective and justified. To be sound should amend to "covenant for a maximum of 15 years and containing specific management measures" and "clawback capped at policy equivalent amount".	The approach to the covenants of Build to Rent schemes is already included within the Adopted Local Plan and the introduction of the wording of 'at least 15 years' is in line with the approach within the draft New London Plan which is considered also to clarify what the Adopted Local Plan refers to as 'the long term'. Therefore specification of 15 years is providing clarity on what is already contained within the Revised Local Plan and therefore is not considered to be a soundness issue.
PRN.011	R19.0059	C78	Section 5	Para 5.14	GLA	Para 5.14 states proposals which address stock imbalances by introducing market and intermediate homes within social rented areas would be appropriate and approach to create mixed and inclusive communities is welcome reflecting GG4.	Noted.
PRN.051	R19.0307	C78	Section 5	Para 5.14	Private Individual	No provision for social housing for disabled and elderly. Demographics are	Revised Local Plan contains policy H.3 which aims at meeting needs for

						changing and will become more imbalances as older people move out and younger move in. People are living longer with deteriorating health. Elderly centres should be attached to schools and share common services such as catering. Ground floor properties should be disabled ready as a legacy of the Paralympics. Large pool for disabled people in area would be an exceptional resource for disability innovation hub at Here East.	older persons' accommodation and requires the provision of affordable housing in accordance with Policy H.2.
PRN.040	R19.0252	C88	Section 5	Para 5.15	Stratford City Business District Limited	Build to Rent restrictions are too onerous and do not recognise the distinct economics. The tenure mix states 60% equivalent to London Affordable Rents (LAR) rents, 30% London Living Rents (LLR) and 10% equivalent rates to other intermediate products. This is inconsistent with the New London Plan which has a 30/70 LLR/range of genuinely affordable rents. There has not been consideration of the level of discount required and viability of achieving the threshold. It is not justified to have same tenure mix for sale and Build to Rent and flexibility should be added in line with New London Plan. Restriction that would be subject to viability tested route is too inflexible and inconsistent with London Plan H13.	<p>The requirements in relation to Build to Rent schemes are considered to be in general conformity with the draft New London Plan. In relation to affordable housing tenure, New London Plan Policy H7 identifies that 40% of affordable housing shall be determined by the local planning authority dependent on need evidence.</p> <p>The Viability Study tested Build to Rent schemes as 30% London Affordable Rent ('LAR') and 70% London Living Rent ('LLR'); 60% LAR and 40% LLR; and 60% LAR, 30% LLR and 10% DMR at 80% of Market Rents. The draft New London Plan identifies under Policy H13 that for Build to Rent schemes to qualify for the Fast Track Route (FTR) the Mayor</p>

							expects at least 30% of DMR homes will be provided at an equivalent to LLR with the remainder of the 70% at a range of genuinely affordable rents. On this basis it is considered that the scenarios tested in the Viability Study appropriately test this requirement. The Housing Delivery Explanatory Note also provides more detail on the approach of the Viability Testing.
PRN.040	R19.0251	C85	Section 5	Para 5.19	Stratford City Business District Limited	Para sets out target and tenure mix and is according to evidence and subject to viability testing to determine viability across the whole area. Quod have reviewed the Housing Requirements Study and this has not considered demand for Build to Rent units against market sale in detail and the mix of the two distinct tenures. Example is impact of shared accommodation within Build to Rent which support housing needs for high quality affordable accommodation. Review of the Viability Study has raised concerns in note about approach taken. Concerns raise risk of deliverability of 35% target where a number of specific items have not been considered in full. Given new viability policy and importance of testing at plan level state these need to be considered in more detail with clearer	The Housing Requirements Study considers the need for housing of different tenures. The OAN for the area relates to the need for housing and does not stipulate the specific tenure therefore Build to Rent can contribute towards meeting these needs as identified within para 3.11 of the Housing Requirements Study.

						understanding of findings to allow those to understand results.	
PRN.010	R19.0031	C87	Section 5	Para 5.20	Mayor of Tower Hamlets	Sentence stating affordable housing allocations following borough approaches suggests the product mix can meet the borough's preferred mix. If so this is supported.	Schemes will be expected to follow the housing mix policies of the Revised Local Plan. The sentence relates to the fact that the boroughs are responsible for the affordable housing nominations process, which is clear from the beginning of the sentence.
PRN.010	R19.0032	C88	Section 5	Para 5.21	Mayor of Tower Hamlets	Support for build to rent schemes delivering same affordable housing mix however 70:30 more appropriate than 60:40. Any affordable rent units should be allocated through borough's allocation process.	Noted.
PRN.011	R19.0062	C91	Section 5	Para 5.23	GLA	Para 5.23 states non self-contained accommodation will be monitored on a 3:1 basis. The draft New London Plan states that this should be a 1:1 basis so should be amended. The term residential sheltered care homes should also be amended to residential nursing care accommodation to reflect london plan. To avoid confusion sheltered accommodation is considered C3.	Para 5.23 refers to 3:1 ratio for older persons accommodation in error. The Housing Background makes it clear that a 1:1 basis is intended so will be corrected within the Revised Local Plan. The references will also be amended to reflect the draft New London Plan terminology. Please see proposed minor modification MM22:For the purposes of clarification, non-self-contained older person's accommodation will be monitored on the basis of <u>1</u> 3 -bedspaces accounting for a single home.
PRN.011	R19.0063	C94	Section 5	Para 5.26	GLA	London Plan does not include an older persons benchmark for LLDC but the Housing Requirements Study (2018)	The Legacy Corporation is willing to accept the proposed minor amendment to be consistent in

						<p>provides figures of demand. Therefore LLDC should work to identify sites suitable for specialist housing. Amendments should be made to ensure consistency with regard to terminology of 'over 10 units' and 'ten units and more'.</p>	<p>wording and reference to sites that are known suitable for specialist accommodation. Please see proposed minor modification MM23: <u>..... Taking these matters into consideration all site allocations are considered suitable for specialist older persons accommodation.</u></p> <p>Para 5.21 will also be amended for consistency referring to 'ten units or more'. See proposed minor modification MM20: Policy H.2 will apply to all residential schemes over <u>of 10</u> units or more or on sites of over 0.5 hectares, including future changes of use of residential floorspace..... In accordance with the Draft New London Plan Estate regeneration schemes should go through the VTR. Policy H.2 will apply to all residential schemes <u>of 10 units or more</u> over 10 units.</p>
PRN.013	R19.0087	C100	Section 5	Para 5.30	TfL	<p>Reference to walking and cycling should be added to public transport accessibility in this Para.</p>	<p>The Legacy Corporation is willing to accept the proposed minor amendment to include reference to walking and cycling within Para 5.30. Please see proposed minor modification MM25: ...are considered most appropriate for PBSA due to the enhanced <u>walking, cycling and public transport accessibility...</u></p>

PRN.010	R19.0035	C117	Section 5	Para 5.40	Mayor of Tower Hamlets	<p>Policy introducing the GLAs 50 bedspace threshold also has a 30 bedspace policy. Should clarify under which when assessed under HMO policy and when under shared living. Support affordable housing but not as a financial contribution. Scale could mean different tenures on same site which would be preferable, as in Council's emerging D.H7 policy.</p>	<p>Paras 5.37 and 5.40 make clear when each policy will apply, making appropriate distinctions between HMOs and shared living. However it is acknowledged that some additional text to Para 5.40 may assist in providing clarity. Please see proposed minor modification MM26: Large-scale shared living is defined by the draft New London Plan as schemes containing 50 or more non-self-contained bedspaces as described above, <u>however for the purposes of this policy shared living proposals of any scale are defined by the above criteria.</u></p> <p>The approach of seeking a financial contribution towards offsite affordable housing follows the draft New London Plan. This type of accommodation does not meet minimum housing space standards and generally consists of bedrooms rather than housing units, so it is not considered suitable as a form of affordable housing itself.</p>
PRN.010	R19.0037	C125	Section 5	Para 5.47	Mayor of Tower Hamlets	<p>Size should not be included within the list of innovations in H8 (7). Undersized units cannot meet need or standards.</p>	<p>This policy acknowledges the new forms of housing products which are emerging and gives the Legacy Corporation the policy tools to specifically deal with such proposals. Policy BN.4 continues to apply the</p>

							Nationally Described Space Standards - Technical Requirements.
PRN.040	R19.0253	C129	Section 5	Para 5.51	Stratford City Business District Limited	Wording states where population density above equivalent schemes with transport or infrastructure demand impacts further S106 contributions may be sought. This wording is ineffective and unsound as no detail on what is considered sufficient which should be defined.	This matter would be dealt with on a case by case basis.
PRN.010	R19.0038	C132	Section 5	Para 5.57	Mayor of Tower Hamlets	Supports widening definition of community facilities to include D2 usage.	Comment noted.
PRN.010	R19.0039	C134	Section 5	Para 5.61	Mayor of Tower Hamlets	The Revised Local Plan fails to demonstrate sufficient schools capacity for the plan period and has an unsound approach to planning for school places through the period and fails to safeguard school places. The Tower Hamlets local plan has taken a different approach which retains flexibility in the delivery of further school places.	Comment noted. The Revised Local Plan continues to express a strategy for schools and school place provision within the Legacy Corporation area in which new school sites are required as part of development within specific site allocations, based on identified requirements and land availability. Beyond this the strategy is for the expansion of existing school sites within the area where and when that need arises. It is recognised that if (later in the Revised Local Plan period) further school place capacity is required beyond this, the Legacy Corporation would need to work with the relevant boroughs to support them in their role as Local Education Authorities in planning to

							meet school place need (See Paras 5.59-5.64 in the draft Revised Local Plan). Since the adoption of the Adopted Local Plan in 2015 the Legacy Corporation has directly delivered, with an education partner, two primary schools and a secondary school. The Revised Local Plan retains the requirement for schools sites/delivery as previously identified. The original evidence on schools/school place need has been reviewed and a Schools Study undertaken with detailed input from the Schools Place Planning teams from each of the four Boroughs. It is therefore considered that the approach taken is robust and evidence based, taking account of the specific circumstances within the area. A 'Schools Explanatory Note' has been drafted to provide further background information about this approach.
PRN.010	R19.0040	C138	Section 5	Para 5.63	Mayor of Tower Hamlets	As per the summary for R19.0039, Tower Hamlets does not feel that the approach the Legacy Corporation has taken towards schools planning is sound and that more should be done to safeguard schools and capacity in the Legacy Corporation area.	See response to R19.0039
PRN.015	R19.0116	no change	Section 5	Policy Cl.1	Bellway Homes (Thames	Expresses concern around viability and that policy Cl.1 should be flexible to	Comment noted. No change has been proposed to this policy and site

		proposed			Gateway)	ensure that it does not affect the viability of schemes and therefore delivery of community infrastructure.	allocations are clear where specific community and other infrastructure will be required as part of development. No change has been considered necessary to achieve conformity with national planning policy or the London Plan and no evidence has been available that would suggest that the policy required updating. The Revised Local Plan also enables the wider viability of schemes to be taken into account in the context of its policies. The Adopted Local Plan was subject to policy viability testing and this has also been carried out in the context of the Revised Local Plan.
PRN.039	R19.0240	no change proposed	Section 5	Policy Cl.1	NHS London Healthy Urban Development Unit	Suggests that policy Cl.1 acknowledges the use of developer contributions to deliver health facilities, highlights that where flexible community space is referred to this is welcome as requirements can change but that clinical space cannot be shared with other uses. Supports where rationalisation of facilities is included and sets out that for health facilities this centres on clinical need. Discusses future provision and mentions inconsistencies between the Infrastructure Delivery Plan and site allocations. Welcomes the opportunity to continue to work closely together	Comments noted. The Legacy Corporation's approach to planning obligations is set out within the Legacy Corporation's Planning Obligations SPD. As requirements have been shown to change through the process from application to delivery of schemes, flexibility has been maintained within the policy to ensure that appropriate space comes forward as opposed to inappropriate space that cannot be used. The Infrastructure Delivery Plan list of projects is regularly reviewed and shall be further reviewed before submission, with

						with the Legacy Corporation and would like to continue to have involvement around section 106 agreements.	focus on healthcare facilities to ensure there are no inconsistencies. It also includes the identification of planned health facilities, for example within the LLDC's Legacy Communities Scheme at Sweetwater and elsewhere, where delivery is required by the associated S106 Planning Obligation. Significant quantities of Use Class D1 space are currently consented within the LLDC area and provide a flexible opportunity for additional healthcare provision in the event that the CCGs or other providers require this. The Legacy Corporation welcomes the opportunity to continue to work with the CCGs on healthcare provision in the Legacy Corporation area.
PRN.015	R19.0117	no change proposed	Section 5	Policy Cl.2	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.010	R19.0028	C71	Section 5	Policy H.1	Mayor of Tower Hamlets	Not clear what identifying potential locations for yielding additional housing capacity are and how capacity can plan for social or transport infrastructure. Small sites not meant to be significant in area but note small site policy requirements, but should be strengthened through reference to design policies in plan.	The Characterisation Study identifies potential small sites delivery from the different character areas. The Housing Background Paper also utilises PTAL mapping to shown the most accessible locations for housing. These will act as tools to help identify areas of search for housing capacity. The policy already

							refers to design policies.
PRN.011	R19.0057	C67, 71, 73	Section 5	Policy H.1	GLA	Welcome the additional text regarding housing delivery and diversifying the housing developments on small sites. No objection to small sites target being compressed in line with minor suggested change to H3ba.	Noted.
PRN.015	R19.0108	C71	Section 5	Policy H.1	Bellway Homes (Thames Gateway)	Provision of family units across all tenures not appropriate and will not meet objectively assessed need. Support Build to Rent as a means of achieving flexible tenancies and managed approach to development. Support tools such as PTAL mapping to identify locations for yielding additional housing capacity. Policy should be reworded to reflect needs for smaller dwellings as identified in the Housing Requirements Study to be effective.	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and strikes an appropriate balance between local and strategic requirements.
PRN.034	R19.0188	C71	Section 5	Policy H.1	Canal & River Trust	The number of houseboats is increasing and boats without home mooring has quadrupled. Trust has published a Mooring Strategy to respond to this and will need to work with other organisations to achieve aims. Keen to discuss any assessment the Corporation proposed to meet requirements of Section 124 of Housing & Planning Act on behalf of the borough housing authorities.	The Housing Requirements Study considers the role of need of boat dwellers within section 6. It considers that although there is no direct 'need' for new moorings within the area there is demand and the role of moorings in meeting overall housing need is small and would fall within the OAN figure for the area, not in addition to it (para 6.43).
PRN.035	R19.0205	C71	Section 5	Policy H.1	National Grid Property (NGP)	Gasholder site requires considerable works to remediate land and remove infrastructure which are abnormal costs	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the

						so need flexibility of policy to ensure development can come forward. Dwelling mix should be based on design and viability. Continued emphasis on para 1 of meeting specified mix is inflexible so unsound as not effective.	GLA SHMA and strikes an appropriate balance between local and strategic requirements. The policy does include sufficient flexibility within it to take account of any site-specific circumstances.
PRN.036	R19.0213	C71	Section 5	Policy H.1	TfL Commercial	Support housing mix and need to provide 1, 2 and 3 bed units with SHLAA. These can be incorporated into all development typologies and optimise sites with high transport accessibility. In line with draft New London Plan D6 and NPPF.	Noted.
PRN.038	R19.0236	C71	Section 5	Policy H.1	British Land	British Land own site within the site allocation SA4.1. Welcome acknowledgement of Build to Rent and its role as a discount market rent in contribution to housing choice. This reflects draft New London Plan H13.	Noted.
PRN.040	R19.0248	C71	Section 5	Policy H.1	Stratford City Business District Limited	Part 1 of H1 seeks schemes including Build to Rent to provide a mix of unit types with 2 bedrooms or more constituting more than half the total. We consider this too restrictive and not reflecting housing needs where small units are more affordable including studios and 1 beds. The Housing Requirements Study suggests there is high demand for 2 bed market and affordable homes this is inconsistent with draft New London Plan H12 which does not allow prescriptive dwelling mix requirements for market and	Policy H.1 is not considered too prescriptive. Para 5.11 allows for a 'balanced mix' of 1, 2 and 3 bed dwellings. The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.

						intermediate. Para 5.11 should state detailed mix of sizes be considered by site circumstances as wording is too restrictive and unjustified. This should be an aspiration and not a policy restriction. This is inconsistent with draft New London Plan H12c.	
PRN.045	R19.0282	C71	Section 5	Policy H.1	Get Living PLC	Bedroom mix requirements of over 50% to be 2 bed or more is too prescriptive and lacks flexibility between sale and Build to Rent. Draft New London Plan states that market and intermediate should not be prescribed. Should remove the 50% requirement for 2 bedroom plus as inconsistent with draft New London Plan.	<p>It is not considered that the policy as drafted is too prescriptive as it allows for a 'balanced mix' of 1, 2 and 3 bed dwellings.</p> <p>The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA (2017) and strikes an appropriate balance between local and strategic requirements as well as maintaining appropriate flexibility in light of the requirements of draft New London Plan Policy H12.</p>
PRN.045	R19.0283	C76	Section 5	Policy H.1	Get Living PLC	Covenant restriction for 15 years is too broad and should be amended to a maximum of 15 years to align with funding lengths for numerous operators and allow for exit should market fail. Clawback reference should be clarified to take into account any foregone planning obligations. Should be amended to "clawback capped at policy equivalent amount".	Although the policy has been amended to make reference to the role of Build to Rent the content of which was previously contained within policy H.7 of the adopted Local Plan which stipulated securing for the long term. Therefore the reference does not relate to a change in policy therefore the amendment is not considered to be necessary in order to make the

							Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.007	R19.0011		Section 5	Policy H.2	Councillor, Hackney Wick Ward	Should include a commitment to seek tenure blind allocation of units (aka pepper-potting). Evidenced advantages for this include creation of mixed and plural communities. Social integration was an objective of the legacy and LLDC. Developers argue financial and administrative advantages of separating private and public housing so not feasible to achieve. This is not supported by clear evidence rather than preference from registered providers on management grounds. The fact that large-scale tenure blind developments led by developers eg at Chobham Farm shows that pepper-potting is feasible on commercial and administrative grounds. Any marginal financial gains would be out-weighed by benefits of reducing social division and discrimination that can accompany segregated developments.	The principle of mixed and inclusive communities is fundamental to the approach within both the draft New London Plan and the Revised Local Plan. Policy H.1 (3) of the Revised Local Plan sets out that all residential proposals should promote the creation of mixed and inclusive neighbourhoods which involves providing for a range of different forms of residential accommodation by size, form, tenure and typology. This is also a specific consideration when the Legacy Corporation considers the suitability of the dwelling size and mix of a proposal. Para 5.14 also states that “Where the Legacy Corporation considers that a proposal could impact negatively on mixed and inclusive neighbourhoods, or harm the residential amenity, character or function of the area, additional justification of the need for the development should be provided in the form of local studies, waiting lists, business cases for the development and potential economic repercussions, should the

							<p>proposal not take place". However the Legacy Corporation is willing to accept that the introduction of additional wording to Para 5.22 may assist in clarifying how this this principle applies specifically in relation to the design and layout of a scheme including affordable housing. Please see proposed minor modification MM21: <u>The principle of mixed and inclusive communities is essential to the design, location and layout of affordable housing across development schemes. Schemes should be designed to aid social cohesion and inclusiveness on a development and individual block scale. This will involve careful consideration of the management and location of affordable units, including how affordable units may be 'pepper-potted' or dispersed across the whole development and where feasible, shared entrances for different tenures.</u> Where affordable housing is provided as dedicated blocks within a larger scheme the affordable housing units should be appropriately located across the site, avoiding parts of the site which may be more constrained or less accessible. Affordable accommodation should be</p>
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							indistinguishable externally from other tenures. <u>Schemes should also ensure a consistency of landscape and public realm design and management across the development as a whole.</u>
PRN.011	R19.0060	C84	Section 5	Policy H.2	GLA	H.2 draft new London plan places more weight on ensuring affordable housing provided on site, particular for schemes of over 25 units. H5 (b) now states must be provided on site with cash in lieu in exceptional circumstances. See H2 and H6 which provide flexibility for small schemes.	The Legacy Corporation is willing to accept the proposed minor amendment to insert reference to 'exceptional circumstances'. Given that the policy already sets out the circumstances where off-site contributions may be appropriate these are indeed those 'exceptional' circumstances so it not a change in policy approach. Please see proposed minor modification MM19: ...Financial contributions will only be acceptable <u>in exceptional circumstances</u> when on-site provision and all potential off-site options have been fully explored and discounted, and linked to a particular site or proposal.
PRN.015	R19.0109	C84	Section 5	Policy H.2	Bellway Homes (Thames Gateway)	Appreciate need to provide a range of tenures however the split does not take account of site specific circumstances and ability of sites to deliver affordable housing. The tenure split should be subject to viability to be deliverable. Strongly object to inclusion of viability reappraisals in introductory Para. HCA	The approach to viability and the viability thresholds are in accordance with the draft New London Plan and the Affordable Housing and Viability SPG. This means that schemes providing 35% or 50% affordable housing at the relevant tenure split can go down the Fast Track Route,

						guidance suggests that review mechanisms should only be appropriate on large multi-phased schemes. Where commencement to take place over agreed timescales reviews should not be necessary so policy should reflect this. Policy should take account of individual development sites, tenure split should be subject to viability and should remove reference to viability reappraisal.	otherwise the Viability Tested Route will apply. This does not prevent individual scheme proposals for individual sites being taken into account on a case by case basis as schemes come forward over time.
PRN.025	R19.0147	C84	Section 5	Policy H.2	London Borough of Hackney	Affordable housing approach differs to that of Hackney where 50% (split 60:40 social intermediate) is achievable on schemes of 10 units and above. Cash in lieu below 10 units is also achievable. This reflected in LP33 Proposed Submission and particularly important in Hackney where around half of capacity comes from small sites.	Noted.
PRN.038	R19.0237	C87	Section 5	Policy H.2	British Land	Welcome acknowledgement of the Fast Track and Viability tested routes which ensure alignment with the New London Plan. Query requirement for developers to demonstrate engagement with a registered provider from outset as it is overly prescriptive and may limit schemes coming forward as would not want commitment where there is still uncertainty or for commercial reasons. So should be removed.	The proposed change which inserted the wording ("from the outset") was for clarification only and does not alter the approach of the Para. No changes are therefore proposed.
PRN.040	R19.0250	C84	Section 5	Policy H.2	Stratford City Business District	Amendments are proposed to wording to be consistent with draft New London	It is considered that the approach within policies H.1 and H.2 provide

					Limited	Plan and Fast Track and Viability tested routes and thresholds. Policy has also been amended to clarify the tenure breakdown as 60/40 low cost rented but its not clear what the requirement for Build to Rent is. This should be consistent with London Plan H13. Support for changes to align with New London Plan and where Build to Rent is proposed should be consistent the draft New London Plan approach to fast track and viability tested route. With this clarification will be effective and sound.	clarity on the role of Build to Rent (see Para 5.21 and 5.12) therefore no amendment is required to ensure soundness of the Revised Local Plan, legal compliance or general conformity.
PRN.045	R19.0284	C84	Section 5	Policy H.2	Get Living PLC	Amendments are to be consistent with the New London Plan relating to the fast track and viability tested routes and thresholds. Amendments also clarify the tenure breakdown as 60:40 low cost rented and intermediate but no recognition of Build to Rent tenure position. Should align with the London plan and set out where Build to Rent approach.	Para 5.21 sets out the approach of affordable housing on Build to Rent schemes.
PRN.045	R19.0285	C87	Section 5	Policy H.2	Get Living PLC	Mayor has set appropriate income caps for preferred tenures of London Living Rent and London Shared Ownership, and in relation to affordable housing the LLDC will follow the approaches of the 4 London boroughs. This Para should be amended for discount market rent for build to rent to be provided at a range of income consistent with the London Plan. The discounts to market	It is considered that the approach to Build to Rent is in conformity with the draft New London Plan.

						rent should be based on incomes of up to £90k providing more units at levels equivalent to London affordable rent.	
PRN.045	R19.0286	C88	Section 5	Policy H.2	Get Living PLC	<p>For Build to Rent schemes to qualify for the fast track route the tenure should consist entirely of Discounted Market Rent with 60% offered at equivalent to London Affordable Rent, 30% as London living rent and remainder equivalent to other intermediate housing offers. This is too onerous and does not acknowledge the distinct Build to Rent economics and are inconsistent with the London Plan which requires 30% London Living Rent and 70% on a range of incomes. Tenure mix requirements are more onerous than for sale where income threshold of us to £90k with Discount Market Rent capped at £60k and 60% of London affordable rent levels which will have significant impact on viability and mean schemes won't come forward. Discount Market Rent should be linked to the market as per 2018 NPPF and income restrictions should be linked too. This is not clear if the discount is linked to income of % of market rent. The Viability Study does not test Build to Rent schemes on a proposed rent or yield we consider this needs to be set out in more detail to understand viability assumptions.</p>	<p>The draft New London Plan within Policy H7 sets out that a minimum of 30% of affordable housing should be low cost rented, 30% intermediate products and the remainder to be determined by the local planning authority based on evidence. Therefore Policy H.2 of the Revised Local Plan sets out that in order to be considered for the Fast Track Route the tenure split to be provided should be 60/40 split in favour of low cost rented and remainder intermediate products. These intermediate products can be owned or rented products. The supporting text at para 5.21 highlights the tenure split for Build to Rent schemes in order to be considered for the Fast Track Route. This is considered to be broadly in line with that of other schemes which may or may not include London Living Rent. Schemes which do not provide the relevant 35% or 50% affordable housing at the relevant tenure split will go through the Viability Tested Route.</p>

					<p>Consider that the tenure mix requirement for Build to Rent are unjustified and undeliverable on basis on income restrictions being more onerous than for sale schemes. Consider that the Para should be redrafted to align with new London Plan with reference to NPPF 2018 which considers 20% Discount Market Rent to be appropriate on Build to Rent schemes. Tenure mix should be amended to accord with the draft New London Plan at 30% LLR and 70% DMR at a range of discounts. 35% affordable housing on Build to Rent is undeliverable. The Viability study does not set proposed yields or rents which need to be assessed accurately to reflect whether affordable housing and tenure requirements are viable. Unable to comment further without the methodology being clarified.</p>	<p>The Viability Study tested Build to Rent schemes as 30% London Affordable Rent ('LAR') and 70% London Living Rent ('LLR'); 60% LAR and 40% LLR; and 60% LAR, 30% LLR and 10% DMR at 80% of Market Rents. The draft New London Plan identifies under Policy H13 that for Build to Rent schemes to qualify for the Fast Track Route (FTR) the Mayor expects at least 30% of DMR homes will be provided at an equivalent to LLR with the remainder of the 70% at a range of genuinely affordable rents. On this basis it is considered that the scenarios tested in the Viability Study appropriately test this requirement. With respect to the rents and yield adopted to value Build to Rent units, it is highlighted that these have been set out in Table 4.17.1 of the LLDC's Viability Study. This identifies that a range of rents of £1,400 to £2,700 per month have been adopted. The range of rents adopted reflects the average achievable market rent on different unit types in the LLDC's area and adopted to value the different units in the typology tested.</p> <p>The Housing Delivery Explanatory Note also provides more detail on</p>
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							the approach of the Viability Testing.
PRN.010	R19.0030	C84/C85	Section 5	Policy H.2 and Para 5.19	Mayor of Tower Hamlets	60:40 social rented/intermediate mix may not be positively prepared in meeting need as LBTH SHMA suggests only 17.5% need for intermediate, at a rate below London Living Rent. LLDC evidence also suggests greater need for low cost rented.	The policy as currently drafted is supported by evidence within the Housing Requirements Study and the GLA SHMA and is considered to strike an appropriate balance between local and strategic requirements.
PRN.015	R19.0110		Section 5	Policy H.3	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.030	R19.0162	C90	Section 5	Policy H.3	Home Builders Federation (HBF)	H.3 is unsound and not effective. NPPF gives greater attention to improving supply of older persons accommodation and there is generally a realisation that local planning authorities need to do more to plan positively for needs. Mayor has assessed this across London through his SHMA and has set targets for each LPA bar the MDCs. The Revised Local Plan should do more, LLDC argues that this is not necessary because it mainly caters for young people but provision would provide for mixed and balanced communities. LLDC area lends itself to provision due to excellent public transport infrastructure. Welcome the policy but without a target such as in the draft New London Plan the policy is unlikely to be effective.	Some minor amendments are proposed to Policy H.3 in response to other representations to clarify which sites are suitable of specialist accommodation. Please see proposed amendment MM23: ... <u>Taking these matters into consideration all site allocations are considered suitable for specialist older persons accommodation.</u>

					<p>Para 5.26 of the Revised Local Plan places onus on providers to demonstrate need whereas the LLDC should be more proactive in setting indicative requirement based on demographic information. NPPF requires plans to contain clear policies of how decisionmakers should react to proposals (para 16d). As is currently written applicants could not be certain whether a scheme would be supported so would be a discouragement. The level of target is not clear as is not supported by a local SHMA. However GLA SHMA identifies substantial growth in elderly population of London of around 73% by 2041 for over 65s. Table 4.4 of London Plan require 4,115 units of specialist older persons accommodation to be provided each year which equates to 6.5% of overall housing requirement of London, so it is reasonable for LLDC to set up a benchmark target of 5% of its requirement to be for older people which would be 108 units per annum. This benchmark need not be binding but HBF have argued in representations to draft New London Plan that if it fails to be achieved in 2 years then applications for older person housing submitted will be considered more favourably in subsequent years and</p>	
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						benefit from 'presumption in favour of sustainable development'. Policy is unsound as it is not effective.	
PRN.010	R19.0033	C90/C95	Section 5	Policy H.3 and Para 5.27	Mayor of Tower Hamlets	Support for older persons' accommodation to provide affordable housing.	Noted.
PRN.010	R19.0034	C97	Section 5	Policy H.4	Mayor of Tower Hamlets	Support for provision of affordable student housing.	Noted.
PRN.015	R19.0111		Section 5	Policy H.4	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.030	R19.0163	C97	Section 5	Policy H.4	Home Builders Federation (HBF)	HBF are alarmed by the extent to which student bedspaces in London have been counted towards housing targets. Population and household projections assume that the institutional population remains constant in GLA SHMA and future student expansion plans are not taking into account the projected growth in the student body. A bedspace should not be considered equivalent to conventional housing supply and the new Draft New London Plan will treat three bedrooms as equivalent to one unit but we remain concerned about the extent this will make up supply in the area. Demand for student accommodation and that of other institutions should be assessed separately from that of C3 housing as Norwich and Canterbury do. Supply of student housing has formed a significant component of housing supply	The draft New London Plan specifies that housing need of students is an element of the wider housing requirement. The Housing Requirements Study (2018) also identifies that the needs of non-communal student households are counted as part of the overall OAN, however, a net increase in student bedspaces in specialist accommodation could reduce the demand from student households. The GLA has also assessed demand for student accommodation within its SHMA.

						within the area in last few years.	
PRN.043	R19.0265	C97	Section 5	Policy H.4	Unite Students	<p>In relation to policy H.4 we note the policy requirement to secure the accommodation through planning agreement or condition for long term student use and be secured for occupation by students of a specified higher education provider. However the previous wording allowed for maximisation for affordable student provision where not possible to secure a nomination agreement therefore policy as amended is more onerous and should be amended to allow for a nomination agreement or the provision of affordable accommodation.</p> <p>Policy as amended could prohibit PBSA developments coming forward as doesn't follow thrust of London Plan. This imposes a further requirement that secures a higher education provider through legal agreement, and this is too restrictive at an early stage in the planning process and does not coincide with the way Unite operate which is to generate demand through students letting directly. Universities are often also reluctant to engage in agreements where they are liable to void payments if they are unable to fill rooms or risk losing the development if it falls behind in the planning or construction process.</p>	<p>It is considered Policy H.4 is in accordance with the approach set out within the draft New London Plan which makes the amendments with respect to linkages to higher education providers and the requirement for affordable housing. The approach to securing a legal agreement is also contained within the draft New London Plan so will be applied across London as a whole.</p> <p>The supporting text at Para 5.28 acknowledges that the provision of student accommodation contributes towards the overall supply of housing. In this context seeking 35% affordable student accommodation is appropriate.</p>

					<p>Removal of this restriction will give greater flexibility and enable delivery essential to addressing student accommodation shortfall.</p> <p>Wording which states that new provision outside the Metropolitan centre area will be acceptable where suitably located for access by walking, cycling or public transport to higher education provider to which proposal is linked. This is supported as it allows flexibility to location provided it meets a need. Therefore encourage support for PBSA across the area as all locations are a short walk to existing and proposed facilities.</p> <p>Policy states provision should facilitate a positive balance of tenure and income and have no adverse impacts. This amended wording is supported however it should recognise how PBSA contributes to mixed and balanced communities. Student population should be afforded an equal standing to residents given that they contribute significantly to local and wider economy and alleviates pressure on housing land supply. Need of students accessing GPs, opticians and dentist services are lower than residential properties with older family members of children as they</p>	
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					<p>invariably attend on campus or where parental home is. PBSA also pay for their refuse collection within the development itself minimising inconvenience to street or council services. Supporting text adds further caveat that there is justification of local market need to ensure proposals will not impact on aims of mixed and balanced communities which is supported. Deletion of reference to overconcentration is strongly supported.</p> <p>In bullet 4 the inclusion of requirement to deliver maximum amount of affordable housing is supported however this should be linked to part 1 and the affiliation of an HEI as this also influences the affordability. This is supplemented by para 5.31 which states that the draft New London Plan expects non-self-contained accommodation to contribute to the supply of affordable housing and new proposals should provide a minimum of 35% on site affordable bedspaces available at a rate affordable to students on maximum state funded financial support, defined and indexed by the Mayor. Unite are concerned that the affordable rent requirement is too high and will hinder delivery. It cannot</p>	
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					<p>be considered in isolation and must be alongside CIL which add to development costs. This will place additional pressure on conventional housing. Additional barriers will slow down delivery in pipeline with unintended consequences such as reduction in supply of PBSA, affordable rent, rents increasing and increase in students in HMOs/general housing and reducing supply.</p> <p>With supply reduced the market will dictate rents of limited supply which will become more expensive. If 35% affordable rent requirement is enforced it is likely that providers will increase rents on remainder to mitigate impact. The practicality of implementation of the policy is flawed and should be left to market. Policy does not allow for consideration of management of the affordable percentage, ie by whom and who dictates the allowance. Unite has made representation to the New London Plan with this respect, included in Appendix to this representation.</p> <p>Support inclusion of para 5.20 which acknowledges the new draft New London Plan policy which states that 'provision of new purpose-built student accommodation (PBSA) can contribute</p>	
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						<p>towards the overall supply of housing', however this states that it should be dispersed and LLDC should ensure that it is permitted in area where meet genuine needs and be appropriate in location. The dispersal fails to consider the contributions it can bring to a locality. Wording which states it will be monitored on a 3:1 basis is supported.</p> <p>It is understood LLDC is consulting on preliminary draft CIL charging schedule however Unite will not be making representation to the increase to £123.17 from £100. Support review of the Adopted Local Plan.</p>	
PRN.011	R19.0064	C104	Section 5	Policy H.5	GLA	<p>Welcome inclusion of the draft New London Plan definition of gypsies and travelling showpeople in the Revised Local Plan. While LLDC has identified provision for those meeting the PPTS definition no provision for the further 15 pitches required. Revised Local Plan sets out commitment to work with neighbouring authorities in finding appropriate sites and monitoring delivery on annual basis. Further capacity needs to be found and so should be amended to state that the "Legacy Corporation will provide".</p>	<p>It is considered that the current wording for the Legacy Corporation to continue to work with the boroughs and other stakeholders to facilitate the delivery of the site allocation for gypsy and traveller use is appropriate given that the Legacy Corporation is not the relevant housing authority.</p>
PRN.015	R19.0112		Section 5	Policy H.5	Bellway Homes (Thames Gateway)	No comments.	Noted.

PRN.025	R19.0148	C104	Section 5	Policy H.5	London Borough of Hackney	Strong support for continued allocation of the Bartrip Street site allocation for gypsy and traveller accommodation to meet need within Hackney. Support commitment to working with boroughs and partners to explore opportunities to meet need. Could specifically mention a regional approach in this matter.	Noted. The commitment from the Adopted Local Plan with respect to working with boroughs and other stakeholders remains.
PRN.015	R19.0113		Section 5	Policy H.6	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.015	R19.0114		Section 5	Policy H.7	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.025	R19.0149	C111	Section 5	Policy H.7	London Borough of Hackney	Hackney's approach prioritises C3 over other forms of residential due to the significant need for genuinely affordable self contained housing with potential flexibility to provide a range of needs. Purpose built student housing, visitor accommodation and shared housing compete directly for land supply with conventional self-contained housing. Council therefore prioritises C3 over these uses.	Noted.
PRN.036	R19.0214	C111	Section 5	Policy H.7	TfL Commercial	Support the Revised Local Plan's position on Build to Rent which is in line with draft New London Plan H13. Policy states to qualify for the fast track route the tenure mix should consist entirely of discounted market rent with 60% offered at a discount equivalent to	Noted.

						London Affordable Rent, 30% as London Living Rent and remainder at equivalent rates to other intermediate housing offers. While this is in line with the New London Plan this will have impact on viability and may mean developments cannot qualify for the fast track route. Welcome greater clarity on this.	
PRN.010	R19.0036	C123	Section 5	Policy H.8	Mayor of Tower Hamlets	Should not direct off site housing even for sui generis.	The approach in the Revised Local Plan follows that contained within the New London Plan.
PRN.015	R19.0115		Section 5	Policy H.8	Bellway Homes (Thames Gateway)	No comments.	Noted.
PRN.010	R19.0026	C64	Section 5	Policy SP.2	Mayor of Tower Hamlets	Welcome the 35%/50% target however could be more clearly phrased when each applied. Do not support the reduced emphasis on family housing/ LBTH SHMA identified a need for 30% family housing.	It is not considered that there is reduced emphasis on the provision of family housing. The policy requirements remain the same and are supported by evidence within the Housing Requirements Study and the GLA SHMA. It is considered that an appropriate balance is struck in relation to the local and strategic requirements.
PRN.011	R19.0056	C63 & C66	Section 5	Policy SP.2	GLA	Welcome commitment to deliver in excess of the 2161 pa target. If rolled forward it would be in excess of 22,000 homes to be delivered for 2020-2036. Welcome the 5% buffer in the trajectory however PPG states the Mayor should distribute the total housing requirement for London. Para 3.19a of the London Plan states to support the	The Housing Delivery Explanatory Note (2019) provides some additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan. The implications of the buffer on sustainable development is noted. In

						<p>range of activities and function in London buffers should not lead to approval of schemes compromising sustainable development, in line with NPPF. 35% affordable housing figure is not a target but as baseline for the threshold approach in H6 and H7. Strategic target is 50% and policy should distinction clear.</p>	<p>relation to the 35% not being a target the Legacy Corporation is willing to propose a minor amendment to make the clarification that the strategic target across London is 50%. Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a <u>strategic target of 50% affordable housing across London. The Legacy Corporation will apply the Mayor's</u> an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity</p>
PRN.015	R19.0107	C64	Section 5	Policy SP.2	Bellway Homes (Thames Gateway)	<p>Support maximising opportunities for delivering housing in neighbourhoods and reference to exceeding housing targets of London Plan. Para 59 of NPPF states objective of significantly boosting supply of homes and policy should encourage in appropriate locations. NPPF requires a five year supply of housing plus a 5% buffer. Housing Delivery Test indicates that if delivery substantially below over previous 3 years a 20% buffer should be applied. At para 5.3 it is stated that the housing trajectory includes a 5% buffer but this is questioned given that delivery cannot be met beyond 2028/9. The assessment</p>	<p>The housing target is set by the GLA in the Mayor's draft New London Plan which has be subject to a rigorous evidence-based approach used across London. It would therefore not be appropriate to develop new local-criteria for establishing a target.</p>

						of the past performance of the boroughs should also form part of the LLDC evidence base for its housing targets. All four boroughs have a poor delivery record and note that LLDC only managed to deliver 51% of the target in 2017 therefore the housing target should be increased. Should also be amended to state that family housing is not required over all tenures.	
PRN.030	R19.0160	C64	Section 5	Policy SP.2	Home Builders Federation (HBF)	HBF is principal representative body of the house-building industry of England and Wales and representations reflect view of membership including multi-national companies, regional developers and small local businesses. Members account for 80% of for sale market housing and large proportion of affordable housing. Wish to participate in examination in public. SP.2 is unsound because it does not conform with the draft New London plan in terms of the delivery timetable and it does not identify deliverable housing land supply to sustain housing delivery over the 16 year plan period proposed so not effective and not positively prepared. Note conformity with the New London Plan with respect to emerging 10 year targets of 2161 per annum which is welcomes but have reservations about ability to deliver in full for 2019-2029 as unsupported by	The Housing Delivery Explanatory Note (2019) provides some additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan. The Housing Requirements Study (2018) includes a number of different methodologies for assessing OAN for the area, all of which fall well below the annual anticipated housing delivery for the area. Pursuant to Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) all local planning authorities must review their local plans at least once every five years from their adoption date. Accordingly the Revised Local Plan (including its housing target, housing

					<p>robust study identifying deliverable sites for these 10 years and contribution to the 65,000 dwellings per annum.</p> <p>HBF have objected to calculation of OAN for London and consider the calculation too low and the housing land capacity assumptions are flawed so Mayor has overestimated supply in London but matter for the London Plan EIP.</p> <p>Revised Local Plan proposed to cover 2020-2036 but draft New London Plan providing 65,000 homes starting 2019/2020 which implies LLDC not proposing to provide 2161 in 2019/2020 which has implications on soundness if this and other authorities not planning for this and bring forward the housing targets in full by 2028/2029 and will comment on this in London Plan EIP.</p> <p>LLDC local plan should therefore cover 10 years to 2029/30 as Mayor has stated he is unable to identify housing land supply for 2028/2029. LLDC should therefore review plan in 5 years in line with London Plan.</p> <p>Para 5.3 states LLDC expect to deliver 22,000 homes to 2036 and is unclear what annualised target is being used.</p>	land supply and delivery rates) will be kept under review.
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						<p>Should assume that the 2161 applies to 16 years which makes 34,576 homes therefore the 22,000 is capacity driven and should be made clear. However the 65,000 London figure is also capacity constrained so the target is twice constrained.</p> <p>Draft New London plan has been amended to require rolling over of annualised targets when the dates extend beyond that of the London Plan so the full housing figure should be 34,576 quoted above, but aware Mayor is unable to identify land supply for period beyond 2028/29.</p> <p>To simplify consider the LLDC should conform to London plan and operate over 10-year timescale. If little ability to deliver beyond 2029 should not have a 16-year local plan period so should keep up to date with regular review. So should have 10 years at 2161 per annum making 21610 homes.</p>	
PRN.035	R19.0204	C64	Section 5	Policy SP.2	National Grid Property (NGP)	Representation made in context of NGPs landholdings in Stratford at Rick Roberts Way. Site is south-eastern corner of SA3.6. NGP has formed joint venture company with Berkeley called St William Homes to deliver homes on redundant gas works sites in London and south east. Rick Roberts Way being	Noted.

						considered for homes and community benefit. Welcome opportunity to comment but need to understand that viability is biggest issue.	
PRN.036	R19.0212	C64	Section 5	Policy SP.2	TfL Commercial	Welcome update to reflect the 2161 pa target and the affordable housing threshold approach contained within the draft New London Plan.	Noted.
PRN.040	R19.0247	C64	Section 5	Policy SP.2	Stratford City Business District Limited	Mayor has set out the threshold approach in Affordable Housing and Viability Supplementary Planning Guidance and incorporated into the draft New London Plan. Additional wording for SP.2 of the LLDC Local Plan states maximising affordable housing through a minimum 35% target across area and applying the 35% and 50% thresholds on habitable room basis. This wording is not clear when the thresholds apply referring to London Plan which could be published before Revised Local Plan adoption and reference would be out of date. Wording is not effective and unsound so requires further clarity to criterion 2 on threshold approach.	The Legacy Corporation is willing to accept the proposed minor amendment to add clarity that 50% is the Mayor's strategic target for London and when the 35% and 50% threshold approach apply. Please see proposed minor modification MM18: The draft New London Plan (2017) sets out a <u>strategic target of 50% affordable housing across London</u> . The Legacy Corporation will apply the Mayor's an affordable housing threshold of 35 per cent affordable homes across London, including 50 per cent on public sector land, and industrial land where there is a net loss in industrial floorspace capacity.
PRN.051	R19.0304	C64	Section 5	Policy SP.2	Private Individual	Change mentions a variety of tenures but does not specify. Affordable housing term is debased and meaningless as it does not take into account pay. Where is provision of social housing for new generations	The affordable housing definitions used are those of the Mayor of London within his draft New London Plan. However for clarification this definition will be added to the Glossary, see minor modification

						including elderly and disabled?	MM64.
PRN.054	R19.0316	C64	Section 5	Policy SP.2	Private Individual	Policy proposes delivering in excess of the 2161 target however the Para states 22,000 homes expected between 2020-2036 which is less than the Adopted Local Plan. Projection of annual target would see in excess of 30,000 homes, given expectation to optimise delivery should state this figure which means plan is unsound without this.	The Housing Delivery Explanatory Note (2019) provides some additional information with regard to expected housing delivery within the area and provides clarity in relation to forecast statements within the Revised Local Plan.
PRN.054	R19.0317	C64	Section 5	Policy SP.2	Private Individual	It will be challenging for sites in area to provide the levels of affordable housing proposed and should be set at lower than the 35 and 50% figures on habitable room basis.	The Revised Local Plan is supported by viability evidence within the Viability Study and the approach to affordable housing thresholds is in accordance with the draft New London Plan.
PRN.025	R19.0150		Section 6		London Borough of Hackney	Welcomes the emphasis on public realm. Hackney's Proposed Submission Local Plan (LP33) has a specific policy on improving public realm. In order for consistency in relation to the treatment of the public realm surrounding canals, officers would like to see the LLDC include a specific policy which prevents overshadowing of canals and waterways in line with LP33.	Comment noted. It is considered that the provisions of policies within the Revised Local Plan are adequate to ensure that the potential effects of overshadowing of waterways and canals are identified and mitigated, in particular the provisions within Policy BN.3 Maximising Biodiversity and BN.4 Designing Development. In the event that a direct reference was considered necessary to make the approach in the Revised Local Plan sound, it is suggested that a modification M4 could be made to Policy BN.4 (7) to include a reference to waterways and canals. This would then read as follows:

							M4: "7. Ensuring surrounding open spaces, including waterways and canals, receive adequate levels of daylight and sunlight."
PRN.051	R19.0303	C143	Section 6		Private Individual	<p>With the developments going up in East Wick, Sweetwater and Pudding Mill there is less and less space for recreation. There is plenty for families with young children and fantastic sports facilities, where is the less formal provision for teenagers and young adults?</p> <p>Why isn't there a skateboard park under Montfitchet viaduct, pavilions for rollerskating/blading and basket ball courts and street dance Or more formal facilities such as an indoor climbing wall on the north side of the Olympic rings hill or bowling for older residents. With all the new development there will no room for music festivals on the park or for fun runs and half marathons.</p> <p>The link to Hackney Marshes needs to be improved and the bridge to the East Marsh reinstated so that festival can take place there and fun runs extended to all weather running paths around the marshes (a sort family path around the East Marsh, a longer one around the West Marsh and combine the two for a</p>	<p>Comments are noted. The Legacy Corporation area has 107 hectares of designated open space, this includes the parkland of the Queen Elizabeth Olympic Park, the Lee Valley Regional Park and other local open spaces delivered throughout the major developments that have taken place in recent years. Where development is taking place on the Queen Elizabeth Olympic Park, these development locations and development parameters were approved in outline as part of the Legacy Communities Scheme Planning Permission which was assessed in the context of the playspace and open space provision within the Park and that which is required to be provided within the development areas. Local Plan polices BN.7, BN.8 and BN.9 (formerly BN.6, BN.7 and BN.8) of the Revised Local Plan require protection of designated open and play spaces, their enhancement and the provision of new, high-quality, publicly accessible open and play</p>

						serious run beginning and ending in the North QEOP. Some CIL would be needed to create and maintain such a running path.	spaces, while identifying key routes for improvement for example for walking and cycling. Figures 15 (Local Open Space) and Figure 16 (Future Local Open Space) together help to identify current and planned open spaces that will provide recreational opportunities. Furthermore, in line with the evidence prepared, changes to Policy BN.9 (former BN.8) have been made to emphasise the different needs that different age groups may have, particularly young people and teenagers, when designing new open space and recreation opportunities. Specific projects are identified within the Infrastructure Delivery Plan and this is reviewed and updated on a regular basis, with listed projects being able to bid for CIL funding.
PRN.006	R19.0010	C181	Section 6	n/a	Historic England	Historic England welcomes the draft Revised Local Plan and considers that it offers an excellent platform to achieve a positive strategy for the historic environment through planning. They welcome the identification of the challenges and opportunities relating to the historic environment as a headline objective to the Revised Local Plan, together with the aim of ensuring growth and development complements and enhances existing local character.	Comments noted.

						Historic England notes the evidence base underlying the heritage-related policies and consider these are comprehensive and proportionate. Historic England also notes and welcome the specific detail relating to the site allocations at Three Mills Island and Sugar House Lane. Historic England considers this appropriate in relation to the conservation and enhancement of the listed buildings on these sites as well as the conservation areas.	
PRN.031	R19.0168	no change proposed	Section 6	Objective 3	Environment Agency	Point of accuracy and clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0042) related to Objective 3 where a change was sought to include the following point: contribute to meeting the targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD)	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see the response R18.0042 contained within the Consultation Report
PRN.031	R19.0170	no change proposed	Section 6	Para 6.4	Environment Agency	Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0044) related to Para 6.4 where a change was sought to include the following [the	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD)

						change is highlighted in bold]: Regeneration, especially in the places that surround Queen Elizabeth Olympic Park, presents opportunities to maximise green infrastructure by integrating new development with waterways and green space and by protecting, extending and enhancing the existing green infrastructure network, local wildlife corridors and the East London Green Grid, <u>whilst contributing to targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD).</u>	has been specifically mentioned within Policy BN.2 and its supporting text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see response R18.0043 contained within the Consultation Report.
PRN.031	R19.0172	C146	Section 6	Para 6.13	Environment Agency	Support to the inclusion of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive in this policy relating to the integration of Sustainable Drainage Systems (SuDS), effective setbacks from watercourses, the naturalisation of the banks and other measures that will improve the management of surface water run-off. Amendment sought to include the following text: "In support of the aims of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive, all developments along the waterways will need to integrate Sustainable Drainage Systems (SuDS), including the use of oil	The Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM27 to Para 6.13 by adding the following to the end of the Para: MM27: "In support of the aims of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive, all developments along the waterways will need to integrate Sustainable Drainage Systems (SuDS), including the use of oil and petrol interceptors, effective setbacks from

						and petrol interceptors, effective setbacks from watercourses, the naturalisation of the banks <u>and green edges to rivers (either in banks or within the concrete channels, when there are developments within the riparian zone)</u> , and other measures that will improve the management of surface water run-off <u>and biodiversity.</u> "	watercourses, the naturalisation of the banks <u>and green edges to rivers (either in banks or within the concrete channels, when there are developments within the riparian zone)</u> , and other measures that will improve the management of surface water run-off <u>and biodiversity.</u> "
PRN.050	R19.0299	C146	Section 6	Para 6.13	Private Individual	Support to the addition of 'Where works are proposed within 8 metres of a main river, a separate formal consent will be required from the Environment Agency'	Comment noted.
PRN.040	R19.0256	C167	Section 6	Para 6.27	Stratford City Business District Limited	<p>The NPPF (July 2018) considers control of design quality from consent to implementation in Para 130, which states: <i>"Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used)."</i></p> <p>The proposed wording is considered unreasonable and not justified as design detailing can be secured through appropriately worded conditions and as</p>	<p>This supporting wording has been provided to explain how the LPA is likely to seek to secure design quality in the event that it receives an outline application for a tall building, given the importance of detailed design to achieving an acceptable impact on surroundings for tall buildings. The wording in relation to obligations to secure adequately skilled design teams is not a specific policy requirement as it is not referenced within the policy itself. The wording in Para 6.28 is clear that there is flexibility in the approach to be followed. Securing the obligation via a S106 agreement will require</p>

						it is more restrictive and not consistent with national policy. Considers that to become sound the proposed wording of Paras 6.27 and 6.28 should be amended to remove the reference to seeking obligations to secure adequately skilled design teams for later design and delivery stages.	the agreement of the applicant which means the precise form of obligation can be tailored to reflect the circumstances of individual proposals. It is considered an appropriate approach to addressing the requirement set out in Para 130 of the NPPF.
PRN.040	R19.0257	C168	Section 6	Para 6.28	Stratford City Business District Limited	see above	See above
PRN.045	R19.0289	C168	Section 6	Para 6.28	Get Living PLC	GL fully support the need for an adequately skilled design team. However, GL also considers that it is not the place of the Local Planning Authority (LPA) to control the appointment of a design team. There are a range of factors that can and do influence the appointment of a design team (that go beyond the realms of planning) and for the Local Planning Authority to seek a planning obligation that seeks to control those appointments could frustrate the process and go beyond the LPA's remit.	The wording in relation to obligations to secure adequately skilled design teams is not a specific policy requirement as it is not referenced within the policy itself. The wording in Para 6.28 is clear that there is flexibility in the approach to be followed. Securing the obligation via a S106 agreement will require the agreement of the applicant which means the precise form of obligation can be tailored to reflect the circumstances of individual proposals.
PRN.015	R19.0119	C144	Section 6	Policy BN.1	Bellway Homes (Thames Gateway)	The policy should be positively prepared so as to achieve sustainable development. The policy should not, however, seek to overly restrict and control development proposals.	Comment noted. There is no change proposed to the overall policy approach, the policy is considered to be sound and compliant with the national planning policy and in general conformity with the London

							Plan.
PRN.031	R19.0171	C144	Section 6	Policy BN.1	Environment Agency	<p>It is positive to see the inclusion of providing wildlife corridors in section 4 (Connectivity) of this policy. It is recommended that section 1 (Landscape and water) also includes WFD when mentioning the natural features, and details why reducing water consumption is of critical importance in London development. Inclusion of these two aspects would reinforce policy references to both this document and the London Plan. In light of the above, the following change suggested:</p> <p>"1. Landscape and water: relate well to the local area's defining natural and man-made landscape features, in particular the linear form of the waterways and parklands, <u>in line with of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD).</u>"</p>	<p>Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text; managing water use and WFD are in detail referred to in Policy S.5. Policy BN.1 has also been cross-referenced to Policy BN.2 and for the purpose of clarity, it will be ensured that a cross-reference is also made to Policy S.5. It is not considered necessary to repeat the approach set within these policies to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan.</p>
PRN.034	R19.0190	C144	Section 6	Policy BN.1	Canal & River Trust	<p>Support to the change to policy BN.1 which would see developments needing to "respect and enhance" landscape features rather than "relate well to" them. The Canal and River Trust believes that this greater clarity is consistent with para 16(d) of the NPPF and, in the context of the area's</p>	<p>Comment noted.</p>

						waterways, is consistent with their status as heritage assets.	
PRN.045	R19.0287	C144	Section 6	Policy BN.1	Get Living PLC	Proposed amendments to Part 7 of Policy BN.1 introduce the need for proposals to "...mitigate noise and air pollution". Our interpretation of this is that it requires that development proposals to mitigate any noise and air pollution relevant to a proposed development opposed to noise and air pollution generally. No amendment sought subject to clarity being provided on the interpretation of the policy.	Comment noted. It is confirmed that as written the reference is intended to require mitigation associated with the impacts of the development proposed.
PRN.050	R19.0300	C144	Section 6	Policy BN.1	Private Individual	Support to the following changes: 4 - the addition of 'and connect habitats to provide wildlife corridors'	Comment noted.
PRN.010	R19.0043	C169	Section 6	Policy BN.11	Mayor of Tower Hamlets	The Council considers that given the level of poor air quality in the LLDC area, this policy should be further strengthened and incorporate the new air quality positive threshold in the emerging London Plan.	Policy BN.11 is considered to be in general conformity with the draft New London Plan; Para two of this policy requires all developments to demonstrate compliance with the polices in the London Plan which contribute to minimising the effects of emissions to the air (Policy SI1 Improving air quality, in part 'A 3' of the draft New London Plan) this seeks an 'air quality positive' approach in large-scale redevelopment areas and those schemes subject to Environmental Impact Assessment and for all other developments to be air quality neutral.

PRN.031	R19.0164	C178	Section 6	Policy BN.14 (formerly BN.13)	Environment Agency	<p>Considers that the policy should include a specific reference to water in the first Para:</p> <p>"To prevent harm to health and the <u>water</u> environment"</p> <p>Considers that while the policy wording is good that strongly recommends more weight is given to the safeguarding of groundwater, not just for drainage. Considers that the policy fails to steer inappropriate development away from areas where the risk to groundwater is high. No reference is made to Source Protection Zones (SPZs). There are a number of SPZs that span the LLDC area and so advises that measures are outlined that seek to protect these. To achieve this, suggested the following text is necessary to make the policy sound and consistent with national policy:</p> <p>"Certain contaminative developments, processes or land uses proposed within or in close proximity to sensitive locations, including Source Protection Zones, may not be acceptable. Applicants are advised to speak to LLDC's Environmental Health Team and the Environment Agency where required."</p>	<p>The Legacy Corporation does not agree that adding 'water' to the beginning of the policy as suggested would be sound as this would change the overall meaning of the policy. The supporting Para 6.51 makes specific reference to "the water environment and groundwater". It is accepted that the policy would benefit from a reference to source protection zones. However, an alternative approach is suggested in the form of a modification to the policy and a minor modification to Para 6.51 (reasoned Justification).</p> <p>Modification M5 to final Para of Policy BN.14 by adding new point 6:</p> <p>M5: "6. <u>Account is taken of any potential impact on any Groundwater Source Protection Zone.</u>"</p> <p>Minor modification MM29 to Para 6.52 by adding the following to the end of the Para:</p> <p>MM29: "<u>The Legacy Corporation area includes a number of groundwater Source Protection Zones (SPZs) and development having an unacceptable effect on</u></p>
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							<u>these may be considered unacceptable. It will be important for applicants to discuss ground contamination issues with the relevant borough Environmental Health team where this may be an issue and, where there is potential for an impact on a SPZ, to discuss this with the Environment Agency."</u>
PRN.015	R19.0121	C181	Section 6	Policy BN.17 (formerly BN.16)	Bellway Homes (Thames Gateway)	Supports the conservation and enhancement of the historic environment but wishes to see excessively detailed or inflexible policies concerning the protection of individual buildings or groups of buildings avoided. Considers that the policy should be amended to recognise that contemporary architecture can contribute to the protection and enhancement of the historic environment and that development proposals should be individually assessed in terms of their townscape merits. Flexibility should be built into this policy to ensure that design proposals are able to respond to their unique settings.	Comment noted. It is not considered that the proposed revised policy changes the existing policy approach within the Adopted Local Plan to development within /adjacent to conservation areas or affecting heritage assets. Rather, it highlights locally specific considerations relevant the context of the area. It is not considered that the policy contains any element that prevents the appropriate introduction of contemporary architecture within these settings.
PRN.050	R19.0298	C181	Section 6	Policy BN.17 (formerly BN.16)	Private Individual	Opposition to bringing the waterways back to their historical use by human beings. The waterways are already in use by a wide range of species, including kingfishers, warblers, swallows, house martins and	Comment noted. Policy BN.2 and its supporting text recognise that the waterways are already in use by a wide range of wildlife. The policy sets the requirement that development, that affects the

						<p>dragonflies. The historical use of the waterways as essentially roads was disastrous for wildlife and our new enlightened legal commitments to protecting biodiversity must acknowledge that we do not want to bring back those aspects of the past that had no respect for biodiversity. The less motorised boats travelling the waterways the better for the wildlife that lives there. The waterways are a very important part of the good quality habitat provided by the Park and this must not be threatened. Already, a pub boat - not a heritage feature - that has been erected on Waterworks River has eradicated the colony of warblers that used to breed there. The recent restoration of Carpenters Lock also threatens the warblers and kingfishers that used to use the area. If the canal boats from the lock restoration are allowed to go down the River Lea itself, it could spell the end for the breeding colonies of warblers in the Lea reed beds.</p>	<p>waterway environment, should improve the ecologic potential. Reference to the relevant Biodiversity Action Plan is also required, as set out in Para 6.13 of this policy. Policy BN.3 reinforces this furthermore by a set of criteria that require development proposals to pay full respect to biodiversity by protecting, enhancing and creating new habitats.</p>
PRN.003	R19.0005	n/a	Section 6	Policy BN.2	Port of London Authority	<p>The Port of London Authority acknowledges that the Revised Local Plan area falls outside of the PLA's jurisdiction, however it is satisfied that the draft Policies adequately promote use of the river for trade, travel, leisure and pleasure.</p>	<p>Comment noted.</p>

PRN.034	R19.0191	no change proposed	Section 6	Policy BN.2	Canal & River Trust	<p>Support to retention of this policy, which in combination with other policies in the plan, will help to protect and enhance the waterways of the area, and that the LLDC continues to see the benefits of specific planning policies for the waterway.</p> <p>Canal & River Trust suggests that the following is added to the policy as point 8:</p> <p>"8. Protect essential waterway infrastructure".</p>	<p>This policy is considered sound in its original form in the Adopted Local Plan. However, the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed modification M3 which would add the following point 8 to the policy as requested:</p> <p>M3: <u>"8. Protect essential waterway infrastructure"</u>.</p>
PRN.025	R19.0151	C147	Section 6	Policy BN.3	London Borough of Hackney	<p>Considers it important that open space and biodiversity policies align across borough boundaries. Supports LLDC's ambition to achieve a net gain in biodiversity as well as the promotion of the Urban Greening Factor in line with the London Plan; these are both concepts that will be introduced in LB Hackney Policy LP33.</p>	<p>Comment noted.</p>
PRN.031	R19.0173	C147	Section 6	Policy BN.3	Environment Agency	<p>Whilst it is positive to see the inclusion of supporting measures in line with the Biodiversity Action Plans (BAPs) in this policy section, it should also be stated that this policy would benefit from supporting WFD measures. This policy should outline the need to deliver environmental improvements outlined in the TRBMP, as a critical way of improving the biodiversity of the</p>	<p>Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. For the purpose of clarity, it will be ensured that this is cross-referenced to Policy BN.3. It is not</p>

						<p>riparian and surrounding environment, which could be implemented alongside measures found in the BAPs.</p> <p>Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0049) related to Policy BN.3 where a change was sought to include the following [the change is highlighted in bold]: <u>7. To deliver environmental improvements outlined in the Thames River Basement Management Plan (TRBMP) as a critical way of improving the biodiversity of the riparian and surrounding environment.</u></p>	<p>considered necessary to repeat the approach set within this policy to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan. Please also see response R18.0049 contained within the Consultation Report.</p>
PRN.050	R19.0297	C147	Section 6	Policy BN.3	Private Individual	<p>Statement 2 should be: 'Provide a net gain in the extent of good quality habitat suitable for a diverse range of species and/or locally and nationally significant species to thrive.' and Statement 8 should be: 'Ensure that planning applications are accompanied by a Biodiversity Statement facilitating a net gain in biodiversity through any proposals. This statement should be assessed and if true, then verified, by an independent professional ecologist.' Without these changes, the Revised Local Plan will not be compliant with legal obligations relating to the Biodiversity Action Plan. 'Good quality habitat' is too vague on its own; the word 'major' could be subjective and a huge loophole; a biodiversity statement</p>	<p>Policy BN.3 has remained substantially unchanged from that in the Adopted Local Plan, with minor changes proposed as a result of suggestions made during the Regulation 18 consultation, as detailed in the Consultation Report. It is considered to be sound in its currently adopted form and with the changes proposed. For Para 2 of the Policy, the change to 'good quality' is considered to provide sufficient flexibility to allow individual development proposals to be judged on their individual circumstances against relevant evidence including the appropriate Biodiversity Action Plan. With reference to Para 8, the requirement being directed to</p>

						without any need for verification could be completely unfounded - and indeed, is likely to be, if an ecologist has not been involved.	applications for major development proposals is included within the existing, adopted policy and is considered to be a proportionate approach.
PRN.045	R19.0288	C149	Section 6	Policy BN.4	Get Living PLC	Considers that Part 2 of Policy BN.4 is unjustified on the basis that the status of the LLDC Design Quality Policy in the decision-making process is unclear and should not therefore be included in planning policy. Accordingly, GL considers that reference to the LLDC Design Quality Policy should be removed from Policy BN.4. If reference is to be made to the document, GL considers that it should only be included as supporting text. GL also request clarity as to the planning status of the LLDC's Design Quality Policy. This applies to all references to this document in the revised Local Plan (and any other document that does not have any formal planning status).	It is considered that the wording of the policy is sufficiently clear in respect of the status of the LLDC Design Quality Policy as best practice guidance to justify the inclusion of this reference. This also reflects the similar existing approach within unchanged Policy BN.6 Requiring Inclusive Design, to the LLDCs Inclusive Design Standards.
PRN.013	R19.0068	C149 and C163	Section 6	Policy BN.4 and BN.5 (formerly BN.10)	TfL	Support to the increased references to streetscape, public routes and spaces, Healthy Streets, public realm.	Comment noted.
PRN.040	R19.0254	C149	Section 6	Policy BN.4 Criterion	Stratford City Business District Limited	Expresses concern about the introduction of the reference to the LLDC Design Quality Policy into this	It is considered that the wording of the policy is sufficiently clear in respect of the status of the LLDC

				2.		<p>policy as it is a guidance document and does not consider it to form part of the LLDC's planning policy. Is concerned is a concerned that by introducing reference to the LLDC's Design Quality Policy the policy gives the guidance more weight for a document, which has not been subject to the same level of scrutiny and examination as Supplementary Planning Documents or Development Plan Documents. Considers that references to local guidance should be removed from the policies in Local Plan as it is unjustified and unsound. If references are to be included these should be made as supporting text only.</p>	<p>Design Quality Policy as best practice guidance to justify the inclusion of this reference. This also reflects the similar existing approach within unchanged Policy BN.6 Requiring Inclusive Design, to the LLDCs Inclusive Design Standards.</p>
PRN.011	R19.0066	C163	Section 6	Policy BN.5 (formerly BN.10)	GLA	<p>Notes the introduction of a new criteria into Policy BN.5 to require significant additional public benefit where tall buildings are proposed above the threshold height outside of locations identified in the Revised Local Plan as suitable for tall buildings (i.e. within the Centres or locations identified within specific site allocations). Considers that further guidance should be provided in the supporting text to clarify this requirement.</p>	<p>The Revised Local Plan has been supported by preparation of a draft Characterisation Study for the LLDC area that sets a baseline for the character areas identified. This has helped to reinforce the existing approach within the Revised Local Plan that directs tall buildings mainly to the designated centres, while in all cases ensures that taller buildings will remain appropriate to their context. It is therefore considered proportionate to ensure that there is a wider benefit from development that is greater than the prevailing or generally expected heights in that</p>

							<p>location. In order to ensure that it is clear that those benefits would need to be genuine material considerations in relation to the scheme proposed, a minor modification MM28 to the supporting text is proposed as follows:</p> <p>Add to end of new Para 6.24 (Change C164) MM28: <u>"That benefit would need to be relevant to the development proposed and relate to specific requirements set out in relevant policies or site allocations within this Local Plan."</u></p> <p>It is not considered appropriate to provide detailed guidance as potential benefits are likely to be specifically related to individual scheme proposals. It is also considered necessary to retain flexibility within the policy to ensure that it does not result in a barrier to proposals for buildings above the identified threshold that might otherwise be beneficial and acceptable in planning terms.</p>
PRN.014	R19.0092	C163	Section 6	Policy BN.5 (formerly	Here East	The requirement for proposals to "achieve significant additional public benefit" is a policy test which is	It is considered that there is nothing within the NPPF or the draft New London Plan that would prevent the

				BN.10)		<p>inconsistent with National Planning Policy, and the Draft New London Plan. The test of public benefit only applies in relation to designated heritage assets. The determination of planning proposals which do not accord with a Development Plan require an assessment of material considerations. Such material considerations could cover a substantially broad range of benefits from a proposed development. Similarly, the burden of this policy test would hinder the delivery of development which would otherwise have material considerations which weigh in favour of such an application.</p>	<p>introduction of this test within the Policy. However, a minor amendment is proposed to the supporting text to provide clarification about how the test would be applied in a way that would be material and relevant to the individual application proposal (See response to PRN.011 and R19.0066 for proposed minor modification). The proposed minor modification MM28 is as follows:</p> <p>MM28, add to end of new Para 6.24 (Change C164):</p> <p><u>"That benefit would need to be relevant to the development proposed and relate to specific requirements set out in relevant policies or site allocations within this Local Plan."</u></p>
PRN.034	R19.0192	C163	Section 6	Policy BN.5 (formerly BN.10)	Canal & River Trust	Canal & River Trust welcomes the retention and enhancement of the policy on tall buildings.	Support noted.
PRN.036	R19.0215	C163	Section 6	Policy BN.5 (formerly BN.10)	TfL Commercial	Supports the aims of the policy and the flexibility that this brings to assessing suitability of tall buildings in individual locations. While is in agreement with the 'generally expected' and 'prevailing' heights listed for the sub areas within the Revised Local Plan, considers that	Comment noted. It is considered that the flexibility in the policy approach, recognised in the representation, allows an optimisation of development that takes into account the suitability of the location and so is in accordance

						there is a need to assess the suitability of tall buildings in the LLDC area on a case by case basis. Identifies that TfL will be potentially be bringing forward developments in the LLDC area that have excellent connections to public transport and development on such sites should be optimised in line with the objectives set out in the DLP and NPPF.	with draft New London Plan and the NPPF.
PRN.040	R19.0255	C163	Section 6	Policy BN.5 (formerly BN.10)	Stratford City Business District Limited	Objects to elements of the wording of Para 5 of the policy in respect of outline applications for tall buildings considering the wording to be ineffective as it does not specify what level of detail would be sufficient for design codes for outline proposals for tall buildings. Suggests amendments that should the policy be adopted would make it sound: “Outline planning applications for tall buildings will only be considered as an acceptable approach where the application is accompanied by a sufficiently detailed design code <u>addressing considerations 1-6 above</u> , coordinated with parameter plans, with these secured as part of any planning permission.”	It is considered that the wording as proposed is sound and that Para 6.27 provides sufficient explanation of what is likely to be required. The amendments suggested are considered to provide a sufficient level of flexibility to take the different circumstances into account that are likely to apply to individual scheme proposals and sites.
PRN.010	R19.0041	C155	Section 6	Policy BN.6 (formerly BN.5)	Mayor of Tower Hamlets	Information sought to clarify which policy implements the optional wheelchair standards.	Requirements that the development should respond to the need of all users is set out in Policy BN.6: Requiring inclusive design (Former

							Policy BN.5). This policy requires relevant residential development to meet the Optional Requirement M4 (2) Category 2 and M4 (3) Category 3 of Part M of the Building Regulations. The only change to this policy is renumbering from BN.5 to BN.6 and deleting the final Para of Former Policy BN.5 in relation to the now superseded London Housing SPG (2012).
PRN.010	R19.0042	C159/C160	Section 6	Policy BN.9 (formerly BN.8) and Para 6.37 (formerly Para 6.28)	Mayor of Tower Hamlets	Support to the additional consideration of facilities for older children/young people.	Comment noted.
PRN.015	R19.0118	no change proposed	Section 6	Policy SP.3	Bellway Homes (Thames Gateway)	Identifies that has no comments to Policy SP.3.	Noted.
PRN.031	R19.0169	no change proposed	Section 6	Policy SP.3	Environment Agency	Point of clarity was sought on the previous Regulation 18 consultation representation (LPR.0015/R18.0043) related to Policy SP.3 where a change was sought to include the following point: Contributes to meeting the targets of the Thames River Basement Management Plan (TRBMP) and obligations of the Water Frameworks Directive (WFD)	Requirement that development should contribute to meeting the targets of the Thames River Basin Management Plan (TRBMP) and Water Framework Directive (WFD) has been specifically mentioned within Policy BN.2 and its supporting text. It is not considered that insertion of this text is necessary to make the Revised Local Plan sound, compliant with national planning

							policy or achieve general conformity with the London Plan. Please also see response R18.0043 contained within the Consultation Report.
PRN.034	R19.0189	no change proposed	Section 6	Policy SP.3	Canal & River Trust	Support to the recognition that "regeneration, especially in the places that surround Queen Elizabeth Olympic Park, presents opportunities to maximise green infrastructure by integrating new development with waterways and green space and by protecting, extending and enhancing the existing green infrastructure network, local wildlife corridors and the East London Green Grid".	Comment noted.
PRN.010	R19.0044	C109 (perhaps 190?)	Section 7		Mayor of Tower Hamlets	Increased focus on car-free development in LLDC area is positive.	Comment noted
PRN.011	R19.0065		Section 7		GLA	Provides context around the capacity challenges at Stratford Station and the stakeholders who are working together with regards to these challenges and some of the potential solutions. Sets out that TfL will continue to work with the LLDC and other stakeholders to deliver interventions. Welcomes the updated references to the need to improve access to Stratford Station.	Comment noted
PRN.025	R19.0153		Section 7		London Borough of Hackney	Supports improvements to access at Stratford International station.	Comment noted
PRN.034	R19.0203	n/a	IDP		Canal & River Trust	Acknowledges the role and importance of the IDP and welcomes the inclusion of several improvements relating to the	The IDP and related project list are currently in draft form and are reviewed on a regular basis in order

						trust's waterways, suggests additional projects to add to the IDP project list.	to capture the most up to date information, needs and proposed projects in the Legacy Corporation area. This suggested addition is noted and the list of projects will be reviewed in light of this.
PRN.013	R19.0074		Section 7	Figure 25	TfL	Suggested amendments to Table 7 or Figure 25 with the addition of strategic cycle infrastructure.	The Legacy Corporation is willing to accept the proposed minor amendment. Minor modifications (MM33/MM34) to Figure 25 is proposed as follows: Figure 25 –add in "strategic cycle infrastructure, such as Cycle Superhighway 2 or Quietway 6 or Lea Valley tow path cycle routes"
PRN.045	R19.0290	no change proposed	Section 7	Figure 25	Get Living PLC	Discrepancy highlighted in relation to a key connection in Sub Area 2. - GL requests that Figure 25 is therefore updated to change the status of the route from Logan Close through Victory Park.	Comment noted, Figure 25 will be updated as a minor modification accordingly. 'Figure 25 to be updated to change the status of the route from Logan Close through Victory Park.'
PRN.013	R19.0069		Section 7	Para 7.5	TfL	Suggested wording to expand Para 7.5 - "Analysis shows (that the planned growth can be accommodated without significant new public transport investment, as long as) the planned and emerging growth in the Legacy Corporation area and east London needs to be co-ordinated with enhancements to public transport network capacity and station capacity,	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan

						alongside local connectivity improvements are brought forward with an emphasis on walking and cycling and smarter travel choices built into new developments.”	sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.013	R19.0070		Section 7	Para 7.5	TfL	Suggested wording change to Para 7.5 - “Improvements to public transport and improved access and capacity to stations in the area... Such schemes include an integrated congestion relief scheme (comprising new access and interchange) at the new entrance at Stratford station” “Improvements to Stratford station as part of an integrated congestion relief scheme access and station upgrade.”	The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change. A minor modification (MM30) to the supporting text is proposed as follows: 3. Improvements to public transport and improved access <u>and capacity</u> to stations in the area... Such schemes include an integrated congestion relief scheme (comprising new access and interchange) at the new entrance at Stratford station.... <u>...6. Improvements to Stratford station as part of an integrated congestion relief scheme access and station upgrade.</u>
PRN.013	R19.0071	C192	Section 7	Para 7.8	TfL	Suggested amendments to wording to Para 7.16 - “Transport for London (TfL) and Network Rail are working closely together to develop Crossrail 2. The proposed route map as confirmed in 2015 the 2018 Mayor’s Transport Strategy would provide a link across	The Legacy Corporation is willing to accept the proposed minor amendment. A minor modification (MM31) to the supporting text is proposed as follows:

						London's southwest to northeast corridor from the north east to the south west. The concept of an eastern branch has previously been explored and focused on an alignment through Hackney, Newham and beyond and Haringey and Network Rail branches. An eastern branch could provide significant benefits to the Legacy Corporation area and continues to be a priority for the growth boroughs that it would include."	Transport for London (TfL) and Network Rail are working closely together to develop Crossrail 2. The proposed route map as confirmed in 2015 <u>the 2018 Mayor's Transport Strategy</u> would provide a link across London's <u>southwest to northeast corridor</u> from the north east to the south west . The concept of an eastern branch has previously been explored and focused on an alignment through Hackney, <u>Newham and beyond</u> and Haringey and Network Rail branches . An eastern branch could provide significant benefits to the Legacy Corporation area and continues to be a priority for the growth boroughs that it would include.
PRN.025	R19.0152	C192	Section 7	Para 7.8	London Borough of Hackney	Welcome reference to potential Eastern branch of Crossrail 2.	Comment noted.
PRN.013	R19.0086		Section 7	Para 7.11	TfL	Assessment around additional funding and Section 106 agreements.	Comment noted. Section 106 agreements and other funding are assessed on a site by site and project by project basis in line with policy and guidance such as the Legacy Corporation's Planning Obligations SPD. The Legacy Corporation will continue to work with TfL around travel infrastructure within the Legacy Corporation and related requirements.
PRN.013	R19.0073	C195	Section 7	Para 7.13	TfL	Suggested amendments to wording to	The Legacy Corporation is willing to

						Para 7.13 - "and new platforms network capacity improvements at Stratford station."	accept the proposed minor amendment. A minor modification (MM32) to the supporting text is proposed as follows: ...and new platforms network capacity improvements at Stratford station.
PRN.034	R19.0194	no change proposed	Section 7	Para 7.18	Canal & River Trust	Questions the extent to which rivers continue to be a barrier to movement in light of increased numbers of bridges in the area and improvements to the towpaths and other aspects of connectivity in relation to the water ways.	Comment noted. It is considered that, although new bridges are currently being delivered, the premise of Para 7.18 is correct and that the waterways continue to provide a barrier to movement, albeit one that is being mitigated overtime with new bridges and connection improvements. Para 7.18 addresses the wider issues of liveability and connections across the Legacy Corporation area and where rivers and canals present a barrier that requires mitigation in some locations.
PRN.012	R19.0090	C184	Section 7	Policy SP.4	NLWP	Concerns around the removal of the reference to utility infrastructure within Policy SP.4, especially in relation to waste requirements.	Comment noted, these references have been moved to Section 8. All utilities have been moved to Section 8 to ensure that they sit together and are easier to read, understand and apply rather than sitting across two sections.

PRN.015	R19.0122	C185	Section 7	Policy SP.4	Bellway Homes (Thames Gateway)	Sets out that the policy should include greater flexibility in relation to scheme viability.	Comment noted, policy SP.4 does include the provision for 'Where appropriate and lawful, infrastructure or contributions toward its delivery will also be secured through the use of Planning Obligations.' However this is not prescriptive and is on a site by site basis, therefore it is not considered that there is a need for wording in relation to viability.
PRN.048	R19.0295	C185	Section 7	Policy SP.4	Private Individual	Policy SP.4 does not make reference to the north of Hackney Wick including roads and bus routes.	Comment noted. Policy SP.4 is a strategic policy which covers the area supporting provision of 'Public transport infrastructure and services that will help to deliver the growth objectives set out within the Revised Local Plan'. Several maps show key current connections and connectivity projects proposed or underway throughout the area, including those towards the north in Hackney Wick which can be seen in figure 25.
PRN.051	R19.0302	C185	Section 7	Policy SP.4	Private Individual	The Revised Local Plan does not mention attempts to integrate with stations towards the north east of the area, such as Leyton or to explore opportunities for potential new stations in the area.	Comment noted. Waltham Forest are the Local Authority within which Leyton Station falls. The Legacy Corporation has worked closely with Waltham Forest and TfL to identify potential for improving transport and connectivity within the area, including capacity. The projects included within the Revised Local Plan have been identified in

							consultation with stakeholders including TfL, Waltham Forest and the other boroughs and through the Legacy Corporation's Transport Study. Where new opportunities have been identified for station or connectivity improvements these have been included within the Revised Local Plan and supporting Infrastructure Delivery Plan and the Infrastructure Delivery Plan list of projects. No projects of the type referred to in this representation have been identified during this exercise.
PRN.034	R19.0195	C202	Section 7	Policy T.10	Canal & River Trust	Supports retention and updates to policy T.10 and highlights the London Mooring Strategy.	Comment noted. The Legacy Corporation will continue to work closely with the Canal and River Trust in relation to the London Mooring Strategy and its implementation.
PRN.013	R19.0072	C193 and C 196	Section 7	Policy T.2 & T.4	TfL	Supports references to Mayor's target for 80% of journeys being undertaken by active travel or public transport by 2041.	Comment noted
PRN.034	R19.0193	C196	Section 7	Policy T.4	Canal & River Trust	Supports encouragement of use of the waterways and towpaths, highlights potential conflicts and pressure and how these can be managed by design, use of alternative routes, behaviour campaigns and developer contributions.	Comment noted. The Legacy Corporation acknowledges the benefits presented by the waterways through potential for active travel, and there are a range of Local Connectivity schemes highlighted within the Revised Local Plan which aim to improve accessibility

							throughout the area in a variety of ways. Policy T.4 sets out requirements to manage development and the transport impacts of development as well as promoting sustainable transport choices and facilitating local connectivity.
PRN.044	R19.0268	C190	Section 7	Policy T.4	LB Newham	Sets out that Policy T.4 does not fulfil the requirement to manage the pedestrian and transport hub impacts of proposals for sites where large events generate many visitors at particular times as Stratford becomes more of a 'destination' with high volume venues that result in high impacts on public transport. It is not clear as to the effects on transport of these types of behaviour and the likelihood of frequent disruptions, with unclear consequences e.g. in relation to reduced car usage. Whilst policy T.4 seeks to manage development and transport impacts, it suggests there should be further reference under T.4.4 to highlight the impacts of proposals that generate large numbers of people rather than just car usage. Particularly in relation to capacity at Stratford Station (and subsequent knock on impacts on the wider network). Policies noted do not tackle the range of key issues relating to impacts of proposed	Comment noted. Policy T.4 remains substantially unchanged from that in the Adopted Local Plan, with the addition of reference to the London Plan Healthy Streets approach to ensure continued general conformity with the London Plan. It is considered that Policy T.4 continues to provide the appropriate policy tools for ensuring adequate assessment of development scheme proposals and their potential impacts. The existing major facilities such as the London Stadium and other venues already have crowd management and other relevant arrangements in place with these secured through their planning permissions where appropriate. It is expected that other proposals that may have significant transport impacts will be robustly assessed using this and other policies and adequate mitigation measure secured where appropriate and

					<p>development to support core objectives of the plan. Policy T4 is not considered to be consistent with the NPPF, chapter 9 (Promoting Sustainable Transport), where Para 102 states that ‘transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed’.</p>	<p>necessary. A Transport Study has been prepared which provides more information on how these matters have been considered as part of the Local Plan review.</p> <p>Policy T.4 sets out a range of requirements in order to ensure that the pressures of new development on public transport, the highway network and other transport infrastructure are mitigated and managed. It includes measures such as target-base Travel Plans and ensuring that new development is designed to include measures that will minimise its impact on public transport. A combination of these measures, site specific requirements and other connectivity improvements set out within the Revised Local Plan are designed to manage the increase of people within the area. Policy T1 and the IDP also refers to the upgrade of Stratford Station which would have a substantial beneficial impact in the context of current and future use and capacity at the station.</p> <p>The policy continues to be considered as a proportionate and appropriate approach to the</p>
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							circumstances of the Legacy Corporation area.
PRN.049	R19.0296	C201	Section 7	Policy T.9	Private Individual	The Revised Local Plan adopts the London Mayor's targets for active travel rather than setting higher targets. QEOP should aim for higher targets to be an exemplar of a healthy community.	Comment noted. The Draft New Local Plan does refer to the Mayor's targets for active travel and does seek to exceed those through requiring development to maximise opportunities for active travel through the area.
PRN.037	R19.0226	C199	Section 7		St William Homes LLP	Parking standards should be site specific.	Comment noted, however the Legacy Corporation reflects the Mayor's aspiration for car free development, especially in areas where there are high PTAL levels. The parking standards applied by the Revised Local Plan are those within the London Plan.
PRN.009	R19.0015	N/A	Section 7	Transport Study	Highways England	Sets out the role of Highways England as the authority responsible for the strategic road network and concerns around the impact that increased traffic in the LLDC area might have on the wider strategic road network. In the case of the area covered by the London Legacy Development Corporation, although there is no SRN in the area, it should be noted that the M11, the A13 section between the A1089 and the M25 junction 30, and the M25 junctions 29 to 30 are located to the north and east of the area respectively. The M25 Junction 30 and the M11 Junction 4 are heavily congested throughout the peak	Comment noted. As part of the Local Plan Review process the Legacy Corporation undertook an updated Transport Study, this study used a range of information, including updated TfL modelling. The TfL modelling has been updated to reflect the changes included within the Draft New London Plan, which includes the increased housing target within the Legacy Corporation area. In addition to this the Revised Legacy Corporation Local Plan reflects the reduced car parking standards set out in the Draft New London Plan, and development

						hour periods and any material increase in traffic on these sections of the SRN would be a concern to the Highways England. Outlines its request at the Regulation 18 stage to understand the residual impacts of the Revised Local Plan on its network and does not consider that this has been addressed.	within the Legacy Corporation area has already included very minimal car parking, which means that any increased pressures on the road network are minimal, and should have a minimal impact on the wider SRN. Information with regards to the Transport Study and its findings, including impact on the wider SRN, is further set out within the Transport Explanatory note.
PRN.025	R19.0154		Section 8		London Borough of Hackney	Supports policies in Section 8 and highlights the Carbon Offset SPD as being particularly useful.	Comment noted
PRN.025	R19.0155		Evidence Base	Flood Risk Assessment	London Borough of Hackney	Thanks the LLDC for sharing Flood Risk Assessment Work undertaken in the Hackney Wick area.	Comment Noted

PRN.031	R19.0165		Evidence Base	Flood Risk Assessment	Environment Agency	Sets out that the Revised Local Plan is unsound due to the evidence base not including a SFRA covering the Legacy Corporation Area.	<p>Comment noted. Whilst the Legacy Corporation is the Local Planning Authority for its area, it is not the Local Authority and therefore has relied on the latest SFRA's prepared by the four boroughs, which include their elements of the LLDC area. A Flood Risk Study has been prepared using this evidence and provides updated assessment and information, including sequential and exceptions testing where relevant, for example where new or changed site allocations have been proposed. This is considered to be the most appropriate and proportionate approach.</p> <p>The Legacy Corporation's approach to testing flood risk in the area is further set out within a Flood Risk explanatory note.</p>
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PRN.031	R19.0175	no change proposed	Section 8	Para 8.12	Environment Agency	Minor modifications recommended for Para 8.12 in order to further highlight the role that climate change will play in changes to London's water resources: 'Part of the wider strategy to help London meet its growing demand for water, resulting from an increase in development and increase in population and climate change, is the need to ensure that this new development is as water efficient as possible and that opportunities are taken to reduce the amount of potable water required. This is particularly the case in the Legacy Corporation area where a significant amount of new development will come forward over the lifetime of the Local Plan and present a new demand for water and a significant opportunity to implement a range of measures that will make that development as water efficient as possible.'	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.5 sets out the maximum achievable approach in planning in accordance with the optional buildings regulations requirements. Para is considered to adequately set out the rationale behind the policy. This suggested change is therefore not considered to be necessary in order for the policy or the Revised Local Plan to be sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.034	R19.0198	C216	Section 8	Para 8.13	Canal & River Trust	Supports the approach to smaller-scale projects that help to separate foul and surface water drainage.	Comment noted

PRN.031	R19.0176	no change proposed	Section 8	Para 8.14	Environment Agency	The Environment Agency is supportive of the requirement for developments to consider the capacity of existing infrastructure for water supply and waste and related supporting text. It is then set out that further wording around retrofitting measures within existing buildings in line with BREEAM standards should be included to further enhance requirements in line with the representation's suggested changes to Policy 3.5: Water supply and waste water disposal.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). It is considered the approach in Policy S.5 continues to be sound in applying the maximum optional building regulations requirement of 110 litres per person per day for housing. While the issue raised is noted it would not be considered sound to require more than is required by the building regulations in the case of refurbishment which may in any case fall outside of planning control. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.002	R19.0003	n/a	Section 8	Policy S.1	Sport England	Sets out the role of Sport England, providing guidance and ensuring positive planning for sport. Sports England recognise that whilst there have been amendments to the Revised Local Plan since the previous iteration which highlight the importance of sporting facilities and industries in the area, comments to the previous	Policy S.1 has been the subject of minimal change to reflect changes to London policy with the Draft New London Plan's inclusion of the Healthy Street's approach. This policy is otherwise consistent with the Adopted Local Plan which was found sound at examination in 2015. Accordingly, other than the

					<p>consultation have not been addressed, and that policy S.1 fails to reference sporting facilities and that the supporting evidence around such facilities for this Local Plan Review are not thorough and therefore the Revised Local Plan is not sound.</p>	<p>amendment to reflect London wide policy changes, this policy is still considered to be sound.</p> <p>The supporting evidence for the infrastructure elements of the Revised Local Plan is the Infrastructure Delivery Plan, which was prepared using relevant up to date borough strategies and evidence in addition to the Legacy Corporation's own Open Space and Play Space Study. This reflects both the nature of the LLDC as a development corporation (rather than a local authority) and the need to take account of evidence in relation to the wider area (due to the relatively small scale of the Legacy Corporation area and the fact that residents travel outside of the area to use the boroughs' facilities and vice versa). The approach within the policy and to the evidence used is considered to be proportionate and in accordance with the requirements of national planning policy and in general conformity with the London Plan.</p>
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PRN.034	R19.0196	C210	Section 8	Policy S.1	Canal & River Trust	Sets out the Canal & River Trust's commitment to promoting the wellbeing benefits of waterways, including potential for active travel and recreation, volunteering and mental health benefits. Wording is suggested to include waterways within policy S.1; "... This should include information on access to schools, health services, community facilities, leisure activities, local shops and services, waterways, parks and publicly accessible open spaces."	The proposed change is noted, however it is not considered necessary to change to the policy where the role of waterways is clearly set out in the supporting text. The suggested change, is therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.039	R19.0241	C210	Section 8	Objective 5/Policy S.1	NHS London Healthy Urban Development Unit	The representation is supportive of Objective 5 but queries the clarity of policy S.1 and how, in practice, this policy will help deliver these aims. It suggests that the wording be changed to add clarity and that health impact assessments become a requirement.	The proposed suggested changes area noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.1 has undergone minor changes to reflect the Healthy Streets approach set out in the Draft New London Plan, therefore this policy has been updated to reflect the current context, rather than being materially changed. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.

PRN.039	R19.0241	C210	Section 8	Policy S.1	NHS London Healthy Urban Development Unit	Supports objective 5 but queries the clarity of policy S.1 and how this policy will help deliver these aims and suggests that the wording be changed to add clarity and that health impact assessments become a requirement.	The proposed suggested changes area noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Policy S.1 has undergone minor changes to reflect the Healthy Streets approach set out in the Draft New London Plan, therefore this policy has been updated to reflect the current context, rather than being materially changed. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
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PRN.034	R19.0197	C213	Section 8	Policy S.2	Canal & River Trust	Questions the energy hierarchy used within policy S.2 and where the Legacy Corporation supports the expansion of the existing heat network in the Legacy Corporation area, other solutions to heat and energy in the area, such as through the use of the canal network as a resource should be included or considered.	Comment noted. The energy hierarchy included within policy S.2 follows the Draft New London Plan energy hierarchy. Policy S.3 does support 'proposals for new heat networks or extensions to any existing heat network, or for renewable energy infrastructure' to serve development'. This means that whilst there is support for extending the existing network it is not at the exclusion of other solutions.
PRN.015	R19.0123	no change proposed	Section 8	Policy S.3	Bellway Homes (Thames Gateway)	Highlights concerns around requirements in relation to new energy infrastructure and scheme viability. Suggests additional wording that states requirements should be applicable 'where feasible and viable'.	Comment noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.

PRN.054	R19.0315		Section 8	Policy S.4	Private Individual	Objection based on the fact that no change has been made to policy S.4 to include modular construction and/or Cross Laminated Timber (CLT) buildings.	Comment noted, however policy S.4 does not favour or exclude any particular construction technique. The policy sets out that 'Proposals for development will be required to demonstrate that they achieve the highest standards of sustainable design and construction'. This could include any construction method that demonstrates such standards including modern methods of construction. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.031	R19.0174	no change proposed	Section 8	Policy S.5	Environment Agency	The representation is positive around the inclusion of policy around water supply and waste water disposal. Sets out that retrofitting should be referenced as part of Policy S.5. This representation also further sets out that BREEAM standards should be included within the policy to further enhance it and that wording should be strengthened around adhering to London Plan requirements.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). In addition, the requirements in the policy are in line with national standards. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.

PRN.010	R19.0046	C221	Section 8	Policy S.7	Mayor of Tower Hamlets	Reference to Tower Hamlet's Local Plan/waste plan should be retained in para 7.8.	<p>The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change.</p> <p>A minor modification (MM35) to the supporting text is proposed as follows:</p> <p>To include reference to Tower Hamlets waste policies: <u>S.MW1: Managing our waste</u> and <u>D.MW2: New and enhanced waste facilities which are relevant.</u></p>
PRN.012	R19.0089	C221	Section 8	Policy S.7	NLWP	Provides an update on the timetable for the NLWP, with a projected adoption date of 2020. The removal of the reference to Tower Hamlets waste policy is also identified with a request for this reference to be reinstated.	<p>The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change.</p> <p>A minor modification (MM35) to the supporting text is proposed as follows:</p> <p>'<u>To include reference to Tower Hamlets waste policies: S.MW1: Managing our waste</u> and <u>D.MW2: New and enhanced waste facilities which are relevant</u>'</p>

PRN.010	R19.0045	C220	Section 8	Policy S.7 (formerly Policy IN.2)	Mayor of Tower Hamlets	Reprovision for waste sites should be provided within the borough in which they originally were located in the first instance, before reprovision elsewhere in London is sought.	The Legacy Corporation has made minor amendments which reflect London wide policy as set out in the Draft New London Plan with regards to the reprovision of waste sites, which sets out that waste sites should be reprovided within London, rather than in the borough that a waste site was originally located in. In relation to apportionment of waste capacity to LB Tower Hamlets within the London Plan, locations within the Fish Island South Strategic Industrial Land designated area are identified in the Revised Local Plan as appropriate for waste use and so have the potential to provide capacity for new waste operations should these be required and proposed. A waste MoU has been signed between the LB Tower Hamlets and LLDC (included within the Duty to Cooperate Background Paper) that includes identification of locations suitable for waste.
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PRN.012	R19.0088	C220	Section 8	Policy S.7 (formerly IN.2)	NLWP	<p>Sets out the background of the North London Waste Plan (NLWP) and highlights the Memorandum of Understanding (MoU) between the Legacy Corporation and the NLWP. The waste sites in Hackney and Waltham Forest that are identified within the NLWP are listed with suggested inclusion within the Revised Local Plan. The NLWP objects to the change around re-provision of waste facilities from within the London Borough in which the waste site is currently located to London wide re-provision and the challenges this causes the NLWP is explained.</p>	<p>The MoU between the NLWP and the Legacy Corporation is an example of both parties continuing to work together on matters related to waste in the NLWP area, and the Legacy Corporation will continue to engage with the NLWP on these issues. The Legacy Corporation does not identify specific sites in relation to waste, instead the Revised Local Plan sets out areas in which waste sites may be located where they meet the acceptability criteria in set out in policy, including areas of Strategic Industrial Locations (SIL) (Fish Island Sough and Bow Goods Yard) and Locally Significant Industrial Sites (LSIS). Those areas appropriate for waste usage are set out in further detail in Table 3 of the Revised Local Plan. The Revised Local Plan reflects London wide policy within the Draft New London Plan in regard to the re-provision of waste sites. The Draft New London Plan sets out that wastesites may be re-provided within London, rather than in the borough where the existing waste site is currently located.</p>
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PRN.031	R19.0166	C227	Section 8	Policy S.10 (formerly Policy S.8)	Environment Agency	<p>We welcome the change to divide the previously proposed policy (Policy S.8: Flood risk and sustainable drainage measures) to give more weight to Flood Risk (S.10) and Sustainable drainage measures and flood protections (S.11). Regarding the newly formed policy Flood Risk (S:10), we are pleased to see the acknowledgement of flood risk mapping and climate change, and how flood mitigation measures can be included to adapt to climate change. However, we would also like to see a policy prohibiting undercroft flood storage or attenuation tanks, and the promotion of level for level and volume for volume flood storage compensation at all opportunities. A number of recent planning applications (particularly within the Hackney Wick and Fish Island area) have come forward suggesting attenuation tanks as a form of flood storage compensation, which is something we are keen to avoid.</p>	<p>Comment noted, however it is not considered necessary for the policy to be prescriptive in terms of flood risk mitigation measures. Individual development proposals should be assessed and mitigation proposed relevant to the circumstances of each location and development proposal in line with policies S.10 and S.11 and as part of the development management process (in consultation with stakeholders such as the Environment Agency and the boroughs as lead Flood Authority). The Legacy Corporation will continue to work closely with the Environment Agency around flood mitigation in the Legacy Corporation area.</p> <p>However, a minor modification (MM37) is proposed to the end of the supporting text at Para 8.28 to highlight the issues raised in the representation. The proposed minor modification is as follows:</p> <p><u>"Undercroft flood storage and attenuation tanks should be avoided and, wherever possible, level for level and volume for volume flood storage be achieved when designing flood risk mitigation measures for</u></p>
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PRN.031	R19.0167	C228	Section 8	Policy S.11 (formerly Policy S.8)	Environment Agency	Sets out concerns around the soundness of policies S.10 and S.11 due to clarity in wording. Suggest moving final Para of Policy S.11 which deals with flood defences is more relevant for Policy S.10 and flood risk.	With no change in wording or approach to the policy proposed it is agreed that moving the Para would make each policy clearer. A minor modification (MM36) is therefore proposed that would remove the following wording from the end of Policy S.11 and place it at the end of Policy S.10: <u>"Where development is proposed on a site that includes an existing flood defence structure, development proposals should be designed to maintain the integrity of existing structure. Where the need for new or improved flood defences have been identified, relevant planning applications should demonstrate that allowance has been made for the relevant works to take place, including sufficient access for construction. Where a development proposal is dependent on the provision, improvement or repair of a river wall or other flood defence structure, these works should be included within the development applied for within the planning application."</u>
PRN.005	R19.0007	n/a	Sub Area 1	B.1b5 – Wick Lane and	National Grid	Identifies National Grid's responsibilities in owning and managing the power distribution network and the need for	Comment noted.

				Crown Close, Fish Island		development proposed for sites within the vicinity of these assets to take these into account. Identifies proposed sites crossed or in close proximity to National Grid infrastructure: B.1b5 – Wick Lane and Crown Close, Fish Island, designated as Other Industrial Land: Underground Cable – 265599 Underground Cable - 262270 Underground Cable - 262261 Underground Cable - 264257.	
PRN.054	R19.0313	C236	Sub Area 1	Development Potential	Private individual	Objects to proposed deletion of the text relating to the development potential of the sub area without an appropriate amount of replacement text that includes minimum housing figures and those related to other land uses, appropriate to some sites within the sub area. Whilst a number of schemes in this area have planning permission or are under construction we still feel that overall development objectives including housing potential, reflective of the draft London Plan housing targets and our comments on other changes to the draft plan, should be included in the draft plan. Considers that this would assist in maintaining the momentum existing in this sub area and the longer term objectives for optimisation of delivery here and that any housing delivery figure should be expressed as a minimum one to encourage such	It is not considered by the Legacy Corporation that the inclusion of this text or an equivalent to it is necessary in achieving a sound strategy within the Revised Local Plan for the LLDC area as a whole or Hackney Wick and Fish Island. The Revised Local Plan has an updated housing target overall and inclusion of minimum housing figures within site allocations. The Revised Local Plan is therefore considered to continue an emphasis on delivery and encourage optimisation.

						optimisation.	
PRN.055	R19.0319	n/a	Sub Area 1	n/a..	Private individual	Queen's Yard will act as a high-quality public space defined by a mixture of cultural and public uses that complement existing uses such as The White Building and the Yard Theatre. In my opinion Queen's Yard and the area around Grow and Bar 90 don't need much or any further development, they are established and popular places to go out for both local people and beyond and will probably get busier in years to come as the area will be more residential. Existing places such as The Yard Theatre should continue as they are, they are well liked and are doing a tremendous job putting on many vibrant and interesting productions and also club nights.	Comment noted. Queen's Yard and the area around this referred to, including Grow and Bar 90 fall within Site Allocation 1.1 Hackney Wick Station Area, which only has one minor change proposed in comparison to the wording in the adopted Local Plan. This change (Change Reference C250) simply inserts a minimum housing number for the site allocation along with an affordable housing threshold percentage). The Yard Theatre is listed within the Infrastructure Delivery Plan Projects List as a community facility, aiding consideration of its future where specific planning proposals might affect its current site. The site allocation area as a whole is also the subject of a resolution to grant planning permission for the outline Hackney Wick Masterplan Scheme (Application Reference: 16/00166/OUT).
PRN.052	R19.0308	C237	Sub Area 1	Para 10.3 Area Priorities	Private individual	Please do not go ahead with this (in relation to reference to the Bow Midland West Rail site). It is having a negative impact on the local community, and putting a strain on local resources.	Comments noted. While the representation refers to Change C237, it specifically refers to the site which is the subject of the proposed new site allocation SA4.5. The addition within the Revised

							Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land. Specific proposals are emerging for the site allocation area and a Screening Opinion has been issued by the LLDC which considers that Environmental Impact Assessment would be required. No specific timetable for submitting a planning application has been identified at this point but this is likely to have occurred by the time of the submission of the Revised Local Plan or soon afterward. The prospective applicant is understood to have undertaken some pre-application consultation and there will be opportunity to respond to specific public consultation by the LLDC once a planning application has been received.
PRN.046	R19.0293	C237	Sub Area 1	Para. 10.3 Area Priorities	Private individual	The text mentions "distinctive sense of place" but does not explain how this will be achieved. Suggests this needs to focus on distinctive heritage style architecture and enhancing the canal and its biodiversity.	Comment noted. The Revised Local Plan sets out the overall strategy to achieving a distinctive sense of place with a focus on heritage-led regeneration in Hackney Wick and Fish Island and wider policy on enhancing biodiversity. More

							detailed guidance has also been produced and adopted in the form of the Hackney Wick and Fish Island SPD.
PRN.034	R19.0199	C242	Sub Area 1	Para 10.8	Canal & River Trust	<p>Welcomes the recognition in para 10.8 that new bridges that have been delivered or planned over the Lee Navigation mean that it is no longer a significant barrier to movement in the Hackney Wick & Fish Island sub-area. Suggests that para 7.18 should be amended so that it is consistent with this.</p> <p>Also suggests that the map on p180 should show the Hertford Union Canal towpath in this area as a key off road connection to be enhanced. Much of this improvement is to be delivered through the consented Wickside development but there are additional enhancements that are required here. We would suggest that this should also be included in the Infrastructure Delivery Plan.</p>	<p>Comments noted. However Para 10.9 states that "New bridges and underpasses should be delivered to overcome the physical severance imposed by the waterways, railway embankment, A12 carriageway and the industrial sites either side of the Hertford Union Canal." It is considered that, although new bridges are currently being delivered, the premise of this sentence is correct and that the waterways continue to provide a barrier to movement, albeit one that is being mitigated overtime with new bridges and connection improvements. It is not considered that this is inconsistent with Para 7.18, which addresses the wider issues of liveability and connections across the Legacy Corporation area and where rivers and canals present a barrier that requires mitigation in some locations.</p> <p>In respect of the suggested change to Figure 31 to show the Hertford Union Canal towpath as a 'Key Off-road Connection to be Enhanced", it</p>

							is noted that this is an existing and well-used key off-road connection rather than one where a new or significantly enhanced route is required. It is understood that an improvement programme is in place here with a significant sum of S106 money recently allocated towards localised improvements. The current description is therefore considered to be correct. However, a project has been added to the Infrastructure Delivery Plan Project List to ensure that this work remains eligible for future contributions to improvements where necessary.
PRN.054	R19.0314	C249	Sub Area 1	Para 10.12	Private individual	Considers that the townscape of the area would be improved through a less rigorous application of the approach set out in this new text (which refers to an established prevailing height of 20 metres above ground level, equating to approximately 4-6 stories and the expectation aside from limited variations that development would remain below this level). Further considers that the height and number of storeys appears to assume that buildings will be mainly commercial. It will be possible to achieve 7 storeys within a mixed use building and within a wider range of parameters that would in turn develop much need housing in	The change introduced here includes the deletion of Policy 1.6: 'Building to an appropriate height in Hackney Wick and Fish Island' and its replacement by the proposed text and proposed new Table 10. There is no change proposed to the overall policy approach to building height within the sub area with this continuing to set the threshold at which the tests within the Tall Buildings policy (BN.5 within the draft Revised Local Plan) are applied. There is also further guidance provided within the Hackney Wick and Fish Island SPD, adopted in March 2018. In conjunction with the

						<p>this highly accessible sub area.</p> <p>Also considers that the wording of the policy is unclear as to what would constitute a 'limited variation' in building height and that these variations should be positively encouraged as part of the interest in the townscape here.</p> <p>Therefore objects to the approach taken in this proposed change and have concerns that it will frustrate and constraint high quality mixed use developments here.</p>	<p>proposed updated Policies BN.4 and BN.5 with which this proposed change is linked, this is considered to provide sufficient flexibility and be an appropriate, proportionate and sound approach.</p>
PRN.048	R19.0294	C241	Sub Area 1	Policy 1.1 Managing change in Hackney Wick & Fish Island	Private individual	<p>The northern part of Hackney Wick lacks retail facilities and tends to be isolated from the planned neighbourhood centre. Your plans include minimal expansion of retail outside the neighbourhood centre and the focus on connections seems to concentrate more on East - West links across the canal than North - South links between the older residential areas and the new centre. The development around Hackney Wick station has been disruptive and has made getting around the area on foot more difficult, especially for older people. There needs to be easily accessible and clearly marked routes linking to the neighbourhood centre to encourage</p>	<p>Comments noted. Construction of the new Hackney Wick Station has made the station itself highly accessible and includes an underpass that will provide a highly accessible and safe link as part of a new north-south route through Hackney Wick to Fish Island. This part of the link will be opened once adjacent construction projects allow this to occur. Policy T9 (includes specific reference to wayfinding and signage such as the Legible London scheme).</p>

						especially older residents to access and use these facilities. There also needs to be consultation with residents north of the neighbourhood centre to find out what retail and other facilities they are currently lacking, otherwise the danger is that the development will cater for the residents of the new developments and neglect the needs of the long term residents who could feel even more isolated and ignored.	
PRN.010	R19.0047	C252	Sub Area 1	SA1.3 – Hepscoth Road	Mayor of Tower Hamlets	The Council acknowledges the existing application for the McGrath site and London Plan policy position relating to the transfer of waste capacity. The proposed amendment (which deletes the wording that ensures that the approach counts towards the boroughs apportionment) should be retained, or at a minimum amended to ensure that it has been demonstrated that the loss of capacity does not have a significant detrimental impact on the borough's ability to meet its apportionment target.	The site (Site Allocation 1.3 Hepscoth Road) has a resolution to grant planning permission for mixed-use redevelopment in accordance with the requirements of the site allocation in the adopted Local Plan (Application reference 16/00451/OUT). In making this decision, the LLDC Planning Decisions Committee, considered the matters related to waste use of the site. It is anticipated that the permission will be issued in the near future on completion of the S106 Agreement. The site owner/operator is in the process of moving their waste management activities to new site in Barking, meeting the London Plan policy requirements for such relocations to be within London. The changes proposed to the site allocation wording reflect the

							<p>principle established through the resolution to grant planning permission, not removing the waste safeguarding unless relocation of waste use elsewhere within London is secured. In relation to apportionment of waste capacity to LB Tower Hamlets within the London Plan, the locations within the Fish Island South Strategic Industrial Land designated area are identified in the Revised Local Plan as appropriate for waste use and so have the potential to provide capacity for new waste operations should these be required and proposed. A waste MoU has been signed between the LB Tower Hamlets and LLDC (included within the Duty to Cooperate Background Paper) that includes identification of locations suitable for waste. Given this background, the proposed change to the wording of the site allocation is considered to be appropriate and proportionate.</p> <p>minor modification is required to correct the policy reference within the site allocation which should now read as Minor Modification reference MM38: <u>Policy S.7</u> rather than Policy IN.2</p>
PRN.014	R19.0091	C256	Sub Area 1	SA1.5 –	Here East	Supports the aim of Site Allocation	Comments are noted. However, it is

				<p>East Wick and Here East (Formerly SA1.7)</p>	<p>SA1.5 East Wick and Here East, including the 'intensification and redevelopment of under-utilised areas'. Considers that this is supported by Paras 118 and 127 of the NPPF along with policies D6 and D8 of the draft New London Plan addressing tall buildings and optimisation of density. Considers that under-utilised parts of the site have the potential to accommodate a tall building which could create a significant landmark at an important economic location within the QEOP and provide substantial job creation. Considers the site allocation should include reference to the site being a suitable location for a tall building.</p> <p>Considers this is supported by the following:</p> <ul style="list-style-type: none"> • Here East is located outside of the Local Plan Review key views, and the Wider Setting Consultation Area for the LVMF SPG (Local Plan Review Figure 18). Its location is not constrained by these views. It would create the opportunity for a new view and landmark within the north west of the QEOP to mark the main economic area of the QEOP, which does not currently incorporate significant variation in the scale of buildings. 	<p>not agreed that there is a need to include a reference Here East as being suitable for a tall building. This would be out of line with the overarching character, policy and planning guidance that has become established for Hackney Wick and Fish Island. Here East does not form a part of the Hackney Wick Centre where taller buildings are considered to be potentially more appropriate. The Adopted Local Plan established a threshold of 20 m above ground level, above which height development proposals would be subject to the policy tests in Policy BN.10. The Revised Local Plan continues this threshold and approach (with Policy BN.10 being redrafted as Policy BN.5). Therefore, any development proposal brought forward for redevelopment or intensification within Site Allocation SA1.5 would, if it were above the threshold, simply need to be tested through the policy criteria in order to establish whether that the level of height proposed would be acceptable within its context and area character. It is noted that while there is no current proposal of which the Local Planning Authority is aware, Here East consider that it</p>
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						<ul style="list-style-type: none"> • It is expected that the detailed design of a development would be able to accommodate design features and mitigation to ensure that it is acceptable in respect of micro-climatic conditions, and the amenity of the surrounding area. Here East is a large site, with capacity within the site boundaries to accommodate a tall building without impacts on the amenity of surrounding residents. • Here East could meet all of the policy requirements as a suitable location for tall buildings. It is an accessible location, increasingly being proven through the location of significant new businesses to the campus, and within the context of future development of East Wick and Sweetwater, will create a range of facilities for both residents and employees. <p>It is therefore proposed that the following reference is included in Site Allocation SA1.5: "Tall buildings may be acceptable in this location subject to Tall Buildings Policy".</p>	would be possible for a tall building proposal to pass the policy tests.
PRN.033	R19.0179	C261	Sub Area 2	Area Profile	London and Continental Railways (LCR)	Recognition should be given to the fact that Zones 1, 2 and 4 of Chobham Farm have detailed planning consent and have been or are currently being built	Change reference number C261 already provides information on the development progress of this Site Allocation. However, the Legacy

						<p>out. In addition, recognition should be given to later phases of the scheme coming forward and contributing to the new vibrant neighbourhood being developed in North Stratford. In order to meet the test of soundness (justified) the text should be amended to state "The Chobham Farm development, providing new homes, open space and local retail use, is equally well underway. The first phase is completed and occupied and Zones 2 and 4 are currently under construction with Zone 4 due to be completed in 2019 and Zone 2 in 2020. London and Continental Railways is also seeking to bring forward part of Zone 3"</p>	<p>Corporation is willing to make a correction, for clarity purposes, to the proposed change.</p> <p>A minor modification to the text is proposed as follows:</p> <p>MM39: The Chobham Farm development, providing new homes, open space and local retail use, is equally well underway, phase one <u>Zone one</u> is completed with zone <u>Zones two and four</u> being currently under construction, and the central section Zone 3 <u>is</u> yet to come forward.</p>
PRN.033	R19.0180	C266	Sub Area 2	Figure 34	London and Continental Railways (LCR)	<p>LCR supports the amendment to Figure 34 to include the Chobham Farm North site and the inclusion of a connection along Leyton Road and through the site to link the site to areas to the north and south.</p>	<p>Support noted.</p>
PRN.044	R19.0274	C271	Sub Area 2	Para 11.10	LB Newham	<p>The following amendments are proposed: Any planning applications for new non-residential uses within the Sub Area should be located within the Local Centre boundary or, where <u>there is a demonstrable lack of access to similar provision within 400m (e.g. physical barriers)</u> and they are of a small enough scale, be located along key routes,</p>	<p>The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan</p>

						particularly where these are active frontages as identified in Figure 32. <u>Applications of non-residential uses outside of the Local Centre will be supported by evidence of market testing and a marketing and meanwhile use strategy to avoid creation of unlettable ground floor voids.</u>	sound or compliant with national planning policy or achieve general conformity with the London Plan. Further guidance will be provided within the Night Time Economy SPD.
PRN.044	R19.0273	C269	Sub Area 2	Policy 2.3	LB Newham	The following change is proposed: Non-residential uses, including A1-A5 and B1a, within Sub Area 2 should be small-scale, serve localised need and be concentrated within the designated Local Centre. Outside of the Local Centre, proposals for these uses <u>will only be supported where there is a demonstrated local lack of access to similar provision within a designated town or local centre</u> , and should be located along key routes and/or in relation to public spaces, and should be of a scale that will serve the needs of the immediate surroundings or be ancillary to a main use with which it is associated <u>while being mindful of the need to avoid unlettable ground floor voids.</u>	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. The Draft Night Time Economy SPD will provide further relevant guidance, particularly in terms of approaches to avoiding ground floor voids.
PRN.045	R19.0291	C269	Sub Area 2	Policy 2.3	Get Living PLC	The extent of the proposed primary frontage should reflect those Plots that benefit from detailed planning permission and/or have/are being implemented.	The approach taken has been to show primary or secondary frontages in locations where development has been completed, establishing the use and therefore the extent of the frontage. Where

							those uses have permission but have not yet been constructed, these have not been included but could be included as part of a future local plan review.
PRN.033	R19.0182	C274	Sub Area 2	SA2.1	London and Continental Railways (LCR)	London and Continental Railways supports site allocation SA2.1 for Chobham Farm for the comprehensive, phased, family-focused, medium density mixed tenure residential development with ancillary non-residential space and local open space. The supporting development principles should give account to the approved parameter plans (PP001 Rev L Zonal Boundaries; PP002 Rev J Maximum Plot Areas; PP003 Rev L Public Realm, Access & Amenity; and PP004 Rev L Maximum Height Parameters) which set out the indicative location, layout and height of development blocks coming forward within the site allocation.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.045	R19.0292	C275	Sub Area 2	SA2.2 East Village	Get Living PLC	The development principles should acknowledge that separate planning application(s) could come forward on development Plots that would sit outside of the outline planning permission for Stratford City for a range of uses Site Allocation SA2.2 should show plot N16 as a development parcel. The Local Centre boundary should be extended to include retail uses within	It is not considered that the current wording of the site allocation, including the 'Development Principles' require remaining development parcels to come forward in accordance with extant planning permissions. Rather the site allocation and the Revised Local Plan as a whole provide a policy framework against which new applications would be judged.

						<p>the plots N06 and the entire plot N16. Plot N16 should be shown within the site allocation as a development parcel.</p>	<p>The Legacy Corporation is willing to accept the proposed modification to the centre boundary. This would reflect existing mainly ground floor uses.</p> <p>Modifications are proposed as follows: M1: Policies Map Extension of East Village town centre boundary to include retail uses that are being developed within the plots N06.</p> <p>MM40: Illustration map to be amended to show Plot N16 as a development parcel</p>
PRN.033	R19.0183	C277	Sub Area 2	SA2.4	London and Continental Railways (LCR)	<p>Support to the proposed development principles for site SA2.4. Suggestion that 3rd development principle should give account to the Leyton Road Study, approved as part of the Chobham farm planning permission. Point 4 should give consideration to the scale of other developments coming forward in the area.</p> <p>Further point should be added to reflect opportunity to create a link northward and to the wider Leyton neighbourhood and this reflected in figure 34.</p> <p>Recognition should be added to the fact that any private land within the site allocation would be expected to provide</p>	<p>Support for principles noted. However, the suggested changes are not considered necessary to make the site allocation sound. In relation to Point 3 it is not considered necessary to include the level of detail suggested in terms of reference to the Leyton Road Study. Existing Policy 2.2 Leyton Road - improving the public realm is considered to provide an appropriate level of context and approach.</p> <p>Point 4: the principle of a stepped approach is considered to be</p>

					<p>35% affordable housing. Clarification sought to which non-residential uses would be appropriate within this site allocation. The relevant planning history should refer to the western part of the site being part of the hybrid planning permission (Zone 5), not the eastern part.</p>	<p>appropriate and supported by the wider principles of addressing the lower rise existing communities to the north and east. It would be expected that any proposals above the 20m threshold height would be tested against Policy BN.5 (previously Policy BN.10)</p> <p>Link northward and Figure 34: it is not considered necessary to add a written point here as the site allocation map shows the principle of this route and this is also already shown on Figure 34.</p> <p>Affordable Housing Threshold. The 50% threshold is considered appropriate for this site as it is also known to be owned by a mixture of public authorities and entities that are publicly owned. This is consistent with the approach within Policy H2 of the Revised Local Plan and that in the draft New London Plan. Affordable housing delivery for all development proposals will be assessed against Revised Local Plan policies SP.2 and H.2 that set out the targets and triggers for the affordable housing delivery, both across the LLDC area and on publicly owned land.</p>
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						<p>Clarity on non-residential uses: it is considered that the current wording of the site allocation provides sufficient guidance to determine the balance of uses between residential and other uses by identifying a minimum number of residential units. In terms of the type of non-residential uses that would be appropriate, Policy is considered to provide sufficient guidance on the approach of the amount of employment floorspace that should be included while maintaining flexibility in terms of the format and potential end-users.</p> <p>The Legacy Corporation is willing to make an amendment, for clarity purposes, to SA2.4 to include reference to Policy B.1.</p> <p>A minor modification is proposed as follows:</p> <p>MM41: Additional Development Principle – <u>“The amount and type of non-residential use should be determined by applying Policy B.1.”</u></p> <p>The suggested minor modification to the Planning History is noted and accepted as follows:</p>
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							MM42: 12/00146/FUM – the <u>eastern western</u> part of the site...
PRN.033	R19.0184	C277	Sub Area 2	SA2.4	London and Continental Railways (LCR)	In order to meet the test of soundness (positively prepared and justified) and to reflect the Vision and objectives for sub area 2, the site allocation should include the whole of LCR' s land which was previously included as Zone 5 of the Chobham Farm development and already has extant permission for 2,000 sqm of B1/ A2 uses, in accordance with the planning permission and approved parameter plans for Chobham Farm.	The Legacy Corporation is willing to accept the proposed modification. Please see proposed modification M6 which shows the inclusion of the land between the railway and the existing warehouse and community building that will remain outside of the site allocation.
PRN.044	R19.0269	C277	Sub Area 2	SA2.4	LB Newham	The site allocation is very broad in its specification of uses and does not appear to align with / pick up on other policies within the Revised Local Plan. It mentions family homes though as per our other representations the Revised Local Plan does not define family housing or establish a threshold offering. The allocation is for 'mixed use' though no reference to what the uses should be other than 'family housing' are made. While existing uses are noted (D1 / B1 / B8), the allocation makes no reference to the protection of these uses as per other parts of the Revised Local Plan. The allocation also refers to sensitivities to the west and north (under Supporting Development Principles) but inexplicably ignores	Comments noted. Policy H.1 (Providing for and diversifying the housing mix) sets out detailed definition of the family housing and how this is expected to be delivered within the Legacy Corporation area and would apply here along with the added emphasis on family housing. The site allocation is located on a non-designated industrial site. The intention of the Policy B.1 is to maintain or reprovide employment uses on sites outside the employment clusters and it provides a set of criteria how this should be achieved. The Legacy Corporation is willing to make an amendment, for clarity purposes, to SA2.4 to include

						existing communities to the east.	reference to Policy B.1. A minor modification MM41 is proposed as follows: MM41: Additional Development Principle – <u>“The amount and type of non-residential use should be determined by applying Policy B.1.”</u> A further minor modification is proposed to the first Development Principle to incorporate reference to taking account of communities to the east when developing development proposals: MM43: "Minimise impacts on residential amenity from railway line to the west and adjoining community building to the north, <u>and on existing residential communities to the east.</u> "
PRN.033	R19.0181	C273	Sub Area 2	Table 11	London and Continental Railways (LCR)	London and Continental Railways considers that the prevailing heights for both Site allocation SA2.1 and SA2.4 should reflect the approved parameter plan for Chobham Farm and the scale and height of existing and emerging development within the immediate area which is up to 10 storeys. It should also reflect recent planning guidance in the NPPF and draft London Plan on	The proposed changes are noted. However, the proposed change to amend the prevailing height for site Allocation SA2.1 does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). The suggested change is, therefore, not

						<p>optimising development, whilst promoting high quality developments. Table 11 should be amended to state: Chobham Farm 30 metres Chobham Farm North 25 metres</p>	<p>considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan. The prevailing heights identified in Table 11 in this section of the Revised Local Plan have remain unchanged and are intended to act as the threshold height above which the tests in Policy BN.5 Proposals for Tall Buildings (previously Policy BN.10) will be applied when considering development proposals. The outline permission for the Chobham Farm development was in place at the time the Adopted Local Plan was developed and adopted and so the unchanged approach here continues to be considered as appropriate and sound.</p>
PRN.033	R19.0178	C260	Sub Area 2	Vision	London and Continental Railways (LCR)	<p>Support to the proposed minor amendments to Vision and Area profile and to proposed site allocations SA2.1 Chobham Farm and SA2.4 Chobham Farm North. To meet the soundness test (justified), this Vision to encourage a thriving neighbourhood and to promote residential use should be reflected in support for additional housing on new sites coming forward for the area and in the site allocations within Sub Area 2, including Site</p>	<p>Comments noted. The Vision to create a family focused, thriving community has been reflected in all Sub Area 2 site allocations. All three site allocations within the Adopted Local Plan have permission in outline and most of the sites have already been delivered, are under construction or benefit from detailed planning permission. Monitoring has shown that developments that are coming forward from these site</p>

						Allocation SA2.4: Chobham Farm North.	allocations contribute significantly toward achieving this vision. The same principles have been applied to the new Site Allocation SA2.4 Chobham Farm North. The site allocation recognises the opportunity for a continuation of the character and a provision of land mixed-uses, including family housing.
PRN.013	R19.0075		Sub Area 3		TfL	Check spellings of Montfichet Road	Noted A number of minor corrections are proposed, see MM54.
PRN.036	R19.0216		Sub Area 3		TfL Commercial	Support broad aims for Sub Area 3 including objectives to deliver 11,000 homes including affordable in period to 2036.	Noted
PRN.013	R19.0080		Sub Area 3	Figure 35	TfL	Figure 35 should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance and Jupp Road footbridge should be shown as a key connection.	Although this does not related to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM51 and correction in relation to location of Jupp Road bridge.
PRN.040	R19.0261		Sub Area 3	Figure 36	Stratford City Business District Limited	Bridge between IQL and Stratford Waterfront is a key connection on road. This is incorrect as this is for residential access only and proposed as such through Stratford waterfront hybrid application. Figure 36 should be amended to show off-road connection.	The Legacy Corporation is willing to accept the proposed correction to Figure 36. Please see proposed minor modification MM52. which amends this to show correctly as an off-road connection.
PRN.013	R19.0076	C282	Sub Area 3	Para 12.3	TfL	Should add an additional bullet	The Legacy Corporation is willing to

						“Enhancing access to and internal capacity at Stratford station”	accept the proposed minor amendment. Please see proposed minor modification MM44: <u>● Enhancing access to and internal capacity at Stratford station</u>
PRN.044	R19.0275	C282	Sub Area 3	Para 12.3	LB Newham	Should include reference to supporting the Metropolitan Centre as a whole including that within the LB Newham planning area and public realm that drives convergence between both parts of the Metropolitan centre.	It is considered that the adopted Local Plan and proposed modification MM45 to support the Metropolitan Centre as a whole effectively deals with the coordination and functionality of the centre.
PRN.044	R19.0277	C288	Sub Area 3	Para 12.7	LB Newham	Should insert reference to focussing large-scale town centre uses within the boundary, including that within the planning area of the London Borough of Newham. Correction should be made to the Stratford High Street Policy number and amend reference from diversification to complementing the centre.	The Legacy Corporation is willing to accept the first proposed minor amendment (with some minor alterations) to the proposed change. Please see proposed minor modification MM46: Any proposals for large-scale town centre uses should be focussed within the existing town centre boundary <u>(including within London Borough of Newham’s planning area)</u> , or where identified as a potential location for expansion. The policy numbering will also be corrected. It is not considered that the second proposed amendment is necessary to make the Revised Local Plan sound, compliant with national planning policy or achieve general conformity with the London Plan.
PRN.013	R19.0078		Sub Area 3	Para	TfL	Para should be amended to reference	Although this does not relate to a

				12.13		capacity constraints at Stratford station	proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM48: The excellent accessibility of the Sub Area is compromised in some locations by physical barriers of roads, railways and waterways, <u>and by the capacity constraints experienced at Stratford station.</u>
PRN.013	R19.0079	C293	Sub Area 3	Para 12.14 (formerly 12.12)	TfL	Para should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance.	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM49: The Legacy Corporation will work in partnership with other relevant bodies including local communities to improve connections <u>and station capacity and multi-modal interchange</u> , particularly on key projects, such as the Jupp Road bridge and improvements to the western <u>new entrances and interventions</u> to Stratford Regional Station
PRN.040	R19.0259	C286	Sub Area 3	Policy 3.1	Stratford City Business District Limited	Support for policy to become International centre and directing large scale town centre uses to within Stratford Metropolitan centre, support for growth in office floorspace and new	The Legacy Corporation is willing to accept the proposed minor amendment to remove the boundary from the Policies Map and Para 4.13. Please see proposed

						residential accommodation in appropriate locations. Criterion 2 refers to boundary of the potential CAZ reserve and this is unjustified and unsound and should be removed.	minor modification MM9: The Town Centre boundaries are shown on the Policies Map, which also shows the Metropolitan Centre boundary as being the location for the potential Central Activities Zone (CAZ) reserve. It is not considered necessary to remove reference within Table 4 as this does not relate to the Policies map.
PRN.044	R19.0276	C286	Sub Area 3	Policy 3.1	LB Newham	Additional bullet should be added to make policy justified and effective and in line with NPPF and London Plan: "7. Ensure development contributes to cross boundary convergence of old and new Stratford through new connections and consideration of impacts on the balance and functionality of the whole town centre."	It is considered that the Revised Local Plan and specifically SA3.1 and Policy 3.3 currently support the connections and functionality of the Metropolitan Centre as a whole. However the Legacy Corporation is willing to accept the proposed minor amendment (with some minor alterations) to the proposed change. Please see proposed minor modification MM45: <u>7. Ensure development contributes to the development of new connections to the eastern part of the centre (within the London Borough of Newham planning area) and the functionality of the Metropolitan Centre as a whole.</u>
PRN.044	R19.0272	C41	Sub Area 3	Policy 3.1	LB Newham	The vision for Stratford Metropolitan Centre set out in Policy 3.1 is supported but there is a lack of engagement with how old and new parts of the centre interrelate and complement each other	At the time of production of the Retail and Town centre Needs Assessment (2018) it was understood that the Morgan House permission (14/02289/FUL) was not

					<p>going forward, lacking reference to integration, balanced distribution of new uses. LLDC Retail and Town Centre Needs Study indicates that most retailer demand is from uses more prevalent in older part of the town centre but continues to be a promotion of development on Westfield side including through support for East Bank expansion. There is no acknowledgement in evidence or policy of commitments on LBN side (Morgan House, Stratford Office Village) and the impacts on capacity. Similarly the approach to Stratford High Street outside the centre boundary as set out in Policy 3.2 is not justified by the evidence base in terms of out of centre overspill for night time, culture and leisure uses given the significant floorspace already proposed outside the boundary at East Bank. Approach to address a tricky ground floor environment, the busy road with space of a night time economy designed into new PRS schemes is questionable. This creates management problems including impact from ground floor environment during day on the town centre which is what should benefit from this demand (indeed evidence state over-provision of such uses and how they should be focussed). There is</p>	<p>likely to go ahead and has now subsequently lapsed. Policy 3.2 acknowledges the role Stratford High Street can play in provision of new retail and leisure floorspace, in support of new mixed use development products and is subject to the impacts assessment so is in accordance with the NPPF. This element of the policy is also included within the Adopted Local Plan therefore, it does not relate to a change as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). It also attempts to deal with environmental and amenity issues through the requirement to enhance the character, townscape and function as a lively main street. The Statement of Common Ground and the Duty to Cooperate Background Paper highlight the engagement of policy-making matters that has taken place.</p>
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						<p>lack of consideration of other uses that may benefit from fringe locations such as community and micro-businesses as LBN encourages. Consideration in all cases needs to be made to town centre impacts, impacts on the street environment and residential quality.</p> <p>Therefore LBN consider policies are not justified or effective and risk the health and vitality of Stratford Metropolitan centre as a whole promoting the level of growth for which there is no demonstrable market appetite against NPPF requirements to plan positively for town centres.</p> <p>Local retail/non residential uses outside centres are poorly controlled as evidenced by voids in Chobham Manor and Stratford High Street areas but this approach has not been re-evaluated.</p> <p>Evidence vase indicated limited need for additional retail even in designated town centres therefore policy doesn't seem to be effective or justified in light of experience and is not consistent with NPPF or in general conformity with the London Plan which requires town centres first principle.</p>	
PRN.057	R19.0322		Sub Area 3	Policy 3.1	StopMsgSphere	Policy 3.1 should be amended to remove reference to 'large-scale' town	Directing large scale town centre uses to the town centres is a key

						centre use and amended to insert the following: “providing that they do not create any additional pressure on the already stretched public transport network, do not result in any negative impacts on residential amenity of existing and future residents living nearby, do not led to increased noise and disturbance, and do not lead to potential increase in anti-social behaviour and crime .”	principle of the NPPF and this is not a change from the policy approach within the Adopted Local Plan. Policy T.4 of the Revised Local Plan sets out that "the Legacy Corporation will 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". BN.12 also deals with noise issues including the 'agent of change' principle which would need to be applied to mitigate and manage noise impacts from new development.
PRN.036	R19.0217	C289	Sub Area 3	Policy 3.2	TfL Commercial	Important that connections are improved around central Stratford and support objectives of 3.2. This includes new southwestern entrance to station. New entrance will improve accessibility of Carpenters Estate, raising PTAL and making suitable for optimisation for residential development. Detailed responses regarding connectivity and public transport will be provided in TfL response.	Noted
PRN.044	R19.0278	C289	Sub Area 3	Policy 3.2	LB Newham	Should make amendments to the wording to state that mixed use proposals along Stratford High Street should complement the existing and planned provision within Stratford Metropolitan Centre as a whole.	It is considered that design policies plus the introductory wording to Policy 3.2 which supports only proposals which "demonstrate that it will enhance the character, townscape and function as a lively

						Remove reference to innovative mixed-use products including shared living where residential and non-residential components are provided as an integrated product focussing on culture and the night time economy at the northern end to Stratford High Street. Wording should be inserted to include appropriate innovative mixed use products including shared living will secure high quality accommodation and ensure ground floor street activation during day and evening.	main street" is sufficient to ensure high quality development and activation in day and night.
PRN.013	R19.0077	C292	Sub Area 3	Policy 3.3	TfL	Para should be amended to reflect a range of potential connectivity interventions at Stratford Station not only specifically the western entrance.	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment. Please see proposed minor modification MM47: The Legacy Corporation will work with its partners to promote improved connectivity and public realm improvements shown as key connections, key connections to be enhanced and principal connection improvements within Figure 35, in particular a new pedestrian bridge from Jupp Road and facilitating a western entrance to <u>new entrances and interventions at Stratford Regional Station</u> .
PRN.036	R19.0219	n/a	Sub Area 3	Proposed Allocation	TfL Commercial	TfL CD support inclusion of Stratford Bus station in the Metropolitan centre	Noted. The site allocation does not go into the depth of plot-specific

				: Stratford Bus Station		and are currently considering the opportunity to redevelop the bus station to provide improved facility that can be co-located with office development of approximately a million sq ft. This redevelopment, one of the busiest bus stations in London would provide opportunities to improve services for passengers to provide better public space and to improve the interchange with Stratford underground, DLR and regional station. Office development would help meet employment targets and CD suggest site is allocated for transport infrastructure and look forward to engaging with the Legacy Corporation on this.	matters however it is acknowledged that the northern parcel of the allocation adjacent to Stratford Station is suitable for mixed use development, including residential. As part of this is also within the Metropolitan Centre boundary then Table 4 also applies to the parcel which highlights residential potential of the centre, focussed around the transport hubs and other attractors. However the Legacy Corporation is willing to accept that additional reference in Para 12.15 to the role of other significant development plans may be helpful. Please see proposed minor modification MM53: The allocation of sites to become a focus for retail, leisure and office development at Stratford and a destination for high-profile visitor, education, sporting and cultural attractions will be a further catalyst for change, enabling the economy to build on its current strengths, accelerating the performance and transformation of east London. <u>The development of other significant development plans across sites within the town centre may also support this role of the Metropolitan Centre.</u>
PRN.040	R19.0260	C295	Sub Area 3	SA3.1	Stratford City	SCBD supports inclusion of minimum	Noted

					Business District Limited	yield of 2000 homes within allocated site which will help with vitality of the centre in accordance with NPPF para 85f. It agrees with revisions to development principles for Development Parcel 1 to introduce residential uses in addition to office and local service retail. This is a positive revision that allows for appropriate land uses to be provided to integrate the commercial centre and residential directly to the north of the Metropolitan Centre.	
PRN.044	R19.0279	C295	Sub Area 3	SA3.1	LB Newham	Should include reference to integration between both parts of Stratford and improved connectivity to eastern side of Stratford via Angel Lane.	It is considered that the Revised Local Plan plus proposed minor amendment MM45 to Policy 3.1: <u>Ensure development contributes to the development of new connections to the eastern part of the centre (within the London Borough of Newham planning area) and the functionality of the Metropolitan Centre as a whole will help facilitate connections and integration of both parts of the centre.</u>
PRN.057	R19.0321	C295	Sub Area 3	SA3.1	StopMsgSphere	Represent local residents opposing the MSG sphere and realise this is also promoted by MSG through the Revised Local Plan and have seen the representation which talks about capacity of up to 25,000 spectators. Also seen the GLA comment seeking	The proposed change is noted. However, the wording 'large-scale town centre use; does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication

					<p>inclusion of reference to MSG proposal in policy. Realised also beyond time limit and wish this to be accepted. Also wish to take part in the examination and serious concerns are heard. These are set out in attached and also is a letter to Newham Mayor and Councillors.</p> <p>Not fully versed on the planning process and are an informal group coming together to oppose the proposal which has not yet been submitted. Focussed time and energy on informing local people of proposal and seeking local councillor help. We've found through door-knocking and leafleting that local people in close proximity have no idea about proposal. Therefore discussions have been held behind closed doors between LLDC and MSG as well as Mayor of London for a long time and appears to be a done deal. Given circumstances it is justified to accept late representation and to be heard by an independent planning inspector. Seek changes to site allocation SA3.1 and the insertion of the words 'large-scale town centre use for Development Parcel 2. This should be deleted and replaced with following wording: "Development parcel 2 could provide a small scale town centre use, with the</p>	<p>Draft) (November 2018). The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.</p>
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						<p>maximum capacity of no more than 1,000 people. Other uses suitable on the site include, but are not limited to: offices, affordable workspace for SMEs and start-ups/"maker space", production space for creative industries, artists' studios or similar uses. Any future proposal must not add any additional pressure on the already stretched public transport network. Given that the site is surrounded by housing on three sides, any future proposal must not result in any negative impacts on residential amenity of local residents. Any future proposal must not exceed the heights of the new residential development immediately to the north of site".</p>	
PRN.034	R19.0200	C297	Sub Area 3	SA3.2	Canal & River Trust	<p>Welcome need for design to take account of waterside setting and regard should be had to setting of local heritage assets such as Carpenters Road lock.</p>	Noted
PRN.044	R19.0271		Sub Area 3	SA3.2	LB Newham	<p>East Bank area is identified within the Revised Plan as a priority project providing new homes for Sadler's Wells, BBC Music and the V&A with the Smithsonian as well as UCL and University of the Arts London's London College of Fashion. Objective 1 of the Revised Local Plan in promoting growth in business, jobs and emphasis on cultural and creative sectors with higher</p>	<p>It is expected that the East Bank and related planning applications will be required to demonstrate and acceptable outcome in terms of density and acceptable residential environment based on the relevant Local Plan policies at the time. The Revised Local Plan has been developed based on evidence from the SHLAA and assessment of</p>

					<p>education makes reference to East Bank as providing cultural and sporting excellence. SP.1's justification outlines how East Bank will become a new cultural focus to the area providing 5000 jobs by 2036 in academic institution and commercial research space, student accommodation and retail, cultural and education institutions sectors. The Housing Background Paper forming the evidence base outline that the LCS has been subject to amendments taking into account East Bank proposals would result in net loss of residential floorspace projected originally to be 1400-1500 units. Deed of Variation to the LCS 106 makes a commitment to making up much of this capacity by increasing density in PDZ8 and 12 and LLDC's ownership gives greater delivery certainty. The Revised Local Plan's evidence base should clarify what is possible and acceptable in light of other policies so it is clear in terms of housing numbers to meet OAN. LBN raise concerns over assumption underlying this that it is possible to deliver higher density through development on all plots. Whilst this may be a possible resolution to housing shortfall it is not justified in planning terms in relation to character and local context to ensure</p>	<p>housing need. The Housing Explanatory Note will provide further detail in relation to housing delivery and the potential implications of amendments at East Bank. The Revised Local Plan's design policies and the character baseline set by the Characterisation study will also be material to the acceptability of specific proposals.</p>
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						strategic approach to delivery of tall buildings which are not harmful to surroundings. Lack of proportionate evidence and analysis of approach questions soundness of position on these sites, in particular need to justify the Revised Local Plan, effectiveness of deliverability and need for meeting OAN and sustainable development objectives of NPPF.	
PRN.016	R19.0129	C299	Sub Area 3	SA3.3	University College London (UCL)	Support for change to SA3.3 to reflect the UCL East approval. Existing policies and supporting Paras are appropriate and support UCLs global status as leading higher education facility with renewed cultural focus.	Noted
PRN.013	R19.0081	C301	Sub Area 3	SA3.4	TfL	Bullets should be amended to reflect a range of potential connectivity interventions at Stratford Station not only the western entrance	Although this does not relate to a proposed change, in the interests of clarity the Legacy Corporation is willing to accept the proposed minor amendment to the supporting development principles (with modifications to take account of other representations). Please see proposed minor modification MM57: <ul style="list-style-type: none"> • Maximise and reflect in any new development or public realm improvement the potential arising from pedestrian movement to and from a new <u>south</u>western entrance to Stratford Regional Station and improvements to the Jupp Road bridge

							<ul style="list-style-type: none"> •The identified <u>options</u> for the new western entrances at Stratford Regional Station and delivery of a western overbridge should be incorporated into redevelopment proposals for this site
PRN.017	R19.0130	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.018	R19.0131	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement	Noted

						and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.019	R19.0132	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.020	R19.0133	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with	Noted

						leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.021	R19.0134	C301	Sub Area 3	SA3.4	Personal response as a resident of the Greater Carpenters District.	Concern about the 2300 gross homes requirement which is too many for area to absorb without drastic change which would impact on residents. It is unlikely this can be achieved without substantial demolition of homes which residents are anxious to preserve. Understand pressures for homes but believe that preservation of the local community, safeguarding rights of leaseholders and preserving social housing requires that the number of new builds is limited to what is compatible with existing homes. Hope it will be possible to facilitate new homes requirement while preserving existing homes and communities.	Noted
PRN.022	R19.0135	C301	Sub Area 3	SA3.4	The Greater Carpenters Neighbourhood Forum	In relation to the supporting development principle setting out need to yield 2300 gross homes with 35% or 50% affordable housing threshold the Forum has always accepted urgent need for more housing in London and understand what area is seen suitable for large numbers of new build. The Neighbourhood Plan provides 500 homes on 5 sites suitable for infill. Do not accept a minimum of 2300 gross homes for the area which would necessitate demolition. Forum can	It is acknowledged that the introduction of a specific housing delivery target for the area will have implications for the work on the Neighbourhood Plan. The Legacy Corporation will continue to provide support to the Neighbourhood Forum with respect to the preparation of the Neighbourhood Plan. It is considered that 2300 new homes (gross) is achievable given the site specific circumstances.

					<p>foresee a possibility of more than 500 new builds, subject to consultation of residents and stakeholders subject to the identification of an additional site the triangle owned by TfL adjacent to Stratford station. Would accept additional new builds only to limit what is possible by developing on the five identified sites within the area plus that owner by TfL which could be suitable for high rise development being part of the town centre, plus any other site which may be identified by the Forum for infill. The Forum, emphasise the highest priority for preserving and where appropriate refurbishing the homes on Carpenters Estate.</p> <p>Forum appreciates importance of Neighbourhood Plan in fitting with local planning policy however the proposed change drastically alters the boundaries within which the Forum has been working over several years in the neighbourhood planning process. It is not clear how the 2300 has been calculated and would like more explanation of this.</p> <p>Regarding the affordable housing threshold of 35% or 50% on public land the Forum welcomes this over previous proposals made for the estate. Would like assurance that a large proportion</p>	
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					<p>would be social housing and for genuine affordable rent. Understand that new build needs to be provide sale to help fund development but would like assurance that genuinely affordable and social homes are not reduced under pressure from developers at a later stage as often happens in London. Reject a net loss of social housing and want to have social housing preserved in preference to new build as average rents for nee build are higher and sizes smaller.</p> <p>In relation to requirement for development densities to reflect location and public transport accessibility and town centre boundary the Forum accepts change regarding the town centre boundary. However are concerned that good transport links are used as argument to squeeze undue number of new homes in area. Stratford is already overcrowded at peak times and need to see evidence supporting claims of under-utilised transport capacity.</p> <p>In relation to BN.5 directing taller buildings towards the town centre boundary there should also be possibility of tall buildings along railway line and where already exist.</p>	
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					<p>Regarding the retention of existing low-rise family housing where it does not prevent wider regeneration objectives the Forum welcome recognition of family housing as a valuable asset on the estate which is becoming rarer in London. Would prefer this is given priority not lower than the wider regeneration objective so should reword to: “Prioritise retention of existing low-rise family housing as this has intrinsic value in creating a human-scale environment, taking due account of the achievement of wider regeneration objectives.”</p> <p>Relating to early community consultation where proposals or plans are brought forward should take account of the Good Practice Guide for Estate Regeneration including residents’ ballots the Forum is unhappy that they should merely ‘take account of’ and advocate changed phrase as “and follow the requirements of the Good Practice Guide...”.</p> <p>Forum welcomes explicit reference to its role in trying to ensure plan for future of Greater Carpenters Neighbourhood area which will service the entire community and recognises rights for all. Are keen to work with</p>	
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						LLDC and Council we would welcome insertion in Local Plan that new targets lead to effective destruction of local community and existing homes.	
PRN.023	R19.0136	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.024	R19.0137	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have	Noted

						been fighting for the community for decades to prevent such change and continue to do so. Reject that previously there was no need for such figures in the GCNF area and we definitely see this as against the mandate of our consultation with the community and our plan.	
PRN.026	R19.0156	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.027	R19.0157	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing	Noted

						people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.028	R19.0158	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.029	R19.0159	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social	Noted

						homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.036	R19.0218	C301	Sub Area 3	SA3.4	TfL Commercial	Support continued allocation of Greater Carpenters District with focus on optimising residential to deliver 2300 homes in plan period. Site allocation notes it already benefits from strong PTAL scores of 4-6b and will increase through station access improvements. Site allocation can play significant role in meeting housing targets for area. TfL land ownership around station includes site east of Gibbins Road in north-east corner of SA3.4 allocation and given PTAL ratings high quality, high density development would be appropriate on site including high proportion of affordable homes. Policy could specifically reference this site as being suitable for residential led development. In cooperation with colleagues in TfL spatial planning Commercial Development will ensure proposals complement delivery of new southwestern entrance to station and do not preclude delivery of new western overbridge as part of integrated congestion relief scheme.	Noted. The site allocation does not go into the depth of plot-specific matters, however it is acknowledged that the northern parcel of the allocation adjacent to Stratford Station is suitable for mixed use development, including residential. As part of this is also within the Metropolitan Centre boundary then Table 4 also applies to the parcel which highlights residential potential of the centre, focussed around the transport hubs and other attractors. However the Legacy Corporation is willing to accept that additional reference in Para 12.15 to the role of other significant development plans may be helpful. Please see proposed minor modification MM53: The allocation of sites to become a focus for retail, leisure and office development at Stratford and a destination for high-profile visitor, education, sporting and cultural attractions will be a further catalyst for change, enabling the economy to build on its current strengths,

							accelerating the performance and transformation of east London. <u>The development of other significant development plans across sites within the town centre may also support this role of the Metropolitan Centre.</u>
PRN.041	R19.0262	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.042	R19.0263	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social	Noted

						homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.056	R19.0320	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	Noted
PRN.057	R19.0321	C301	Sub Area 3	SA3.4	Owners/stakeholders in Greater Carpenters Neighbourhood Area	Response concerns change 301 for the area. This states that the site allocation is expected to yield a minimum of 2300 homes gross with 35% or 50% affordable housing threshold. This would mean demolition of existing homes and is impossible to build so many in area without impacting community for the worse, forcing people to move, destroying social homes with inadequate replacement	Noted

						and jeopardising situation with leaseholders and freeholders. Have been fighting for the community for decades to prevent such change and continue to do so.	
PRN.035	R19.0206	C303	Sub Area 3	SA3.6	National Grid Property (NGP)	SA3.6 sets the policy framework for Rick Roberts Way land including gasworks site. Sets out comprehensive mixed use development seeking a minimum of 750 homes and affordable housing threshold of 50% across portfolio of sites. To enable delivery needs to consider viability to seek appropriate amount of affordable housing and support reference to cost of remediation but high density development should be a priority to make best use of brownfield land. LLDC should bring in flexibility. Reference to 50% affordable housing assumes public land across whole site but area in south-eastern corner is not so should not be subjected to this requirement. Need to also understand costs of removing surplus gasholders in delivering successful regeneration schemes. Site allocation should allow for gasholder site to come forward separately from the rest of the allocation with its own access. This would allow delivery of much needed housing even if there were delays to delivery of the wider area. SA3.6 seeks provision for primary	It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per cent where the development is on public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u>

					<p>school and open space and Table 6 identifies potential at Rick Roberts Way. This was previously identified in 2015 Local Plan as potential schools site and proposed change states site may be required in second half of plan period and if no such requirement this will be identified at the time based on monitoring of need. Given significant land take required for school it is important to review whether schools is required in part or at all dependent on provision of other school places in local area. If there is a surplus then land should be reallocated for housing to help meet housing targets.</p> <p>Consequently flexible reference within the allocation are welcomed and is noted that if school is required this should not be on NGP land as it is constrained and costly to develop and would have viability implications. It is noted that the height figure has been reduced from the adopted plan from 31m to 30m but heights should be established through an iterative design process to ensure optimisation of brownfield land. Welcome recognition of remediation cost and this should allow for flexibility on affordable housing. Wording is unsound as it is not justified and is not most appropriate strategy to bring site forward. Look</p>	
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						forward to working on Local Plan and support continued allocation of RRW gasholder site.	
PRN.037	R19.0223	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>The Lower Lea Valley Opportunity Area Planning Framework seeks the delivery of 50,000 new jobs and 32,000 new homes and site allocations should be reviewed in this context, focussing on delivery of homes and jobs. This should be read in conjunction with other policies such as H2. Further detail on the 'portfolio approach' is required as set out within H.2 (C17) the policy seeks 50% affordable housing across a number of allocated sites including SA3.6. Should confirm the portfolio only applies to LLDC land and not the site. Concern that as drafted this will not facilitate the timely delivery of the site and so is not positively prepared or sound. Should ensure the policy requirements where relate to infrastructure provision and do not result in duplication of S106 and CIL and direct provision is appropriately recognised. Primary school requirement is not justified and have submitted representations to CIL charging schedule consultation. Welcome the site allocation but amendments are sought to ensure development of the site can occur in advance of release of other elements of the allocation and</p>	<p>It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per cent where the development is on public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u></p>

						does not fetter regeneration of wider allocation.	
PRN.037	R19.0224	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Remainder of the land within SA3.6 is under separate ownership and delivery timescales may differ. Adidas have temporary permission for a sport facility on the north of the site for 3 to 5 years. SA3.6 should allow for independent delivery in a manner that is comprehensively planned. This should reflect the site specific circumstances and challenges and opportunities posed. Delivery should not be dependent on the adjacent land.</p> <p>Such an approach could accelerate housing delivery, enable remediation and decommissioning processes to commence and allow for viability of the site to be considered in isolation. LLDC can ensure that SA3.6 is comprehensively planned through an iterative design and masterplanning process.</p>	It is not considered that the site allocation prevents part of the site coming forward in advance of the land owned by the Legacy Corporation provided the whole site allocation is delivered in a comprehensive manner.
PRN.037	R19.0225	C17	Sub Area 3	SA3.6	St William Homes LLP	<p>St William recognises need to deliver affordable housing and support efforts to do so. Key element of this will be maximising number of homes delivered. Former gasholder sites are unique in terms of use and character and abnormal technical costs, with phasing implications. Costs associated with remediation and long term</p>	It is acknowledged that a proportion of the site allocation does not fall within the LLDC Priority Projects boundaries therefore the Legacy Corporation is willing to propose a minor amendment to the proposed change to highlight the approach of Policy H.2 which sets out a 35 per cent affordable threshold or 50 per

					<p>infrastructure requirements. LLDC should adopt a flexible approach to affordable housing and developer contributions to ensure landowners are not discouraged from bringing complex brownfield sites forward.</p> <p>C303 and C17 refer to 50% affordable housing using Portfolio Approach across a number of allocations. This should be clarified as applying only to land within LLDC ownership. Revised Local Plan responds to draft New London Plan's approach in setting benchmark level of affordable housing and the trigger for viability review. Draft London Plan will be subject to examination and Panel may recommend changes. This sets a strategic 50% target across London and for industrial land the target is 50% if results in a net loss of industrial capacity.</p> <p>Redevelopment of the site will not result in a net loss of industrial capacity and if it were formally used for B class purposes this was sui generis. This is due to modernisation of gas infrastructure allowing these sites to perform functions in more efficient manner alongside new development.</p> <p>The redevelopment of the Site will not</p>	<p>cent where the development is on public land or industrial land where there is a net loss of industrial capacity. Please see proposed minor modification MM59: Provide affordable housing across the portfolio sites (site allocations SA3.2, SA3.5, SA3.6 and SA 4.3) based on an affordable housing threshold of 50 per cent, <u>and in accordance with Policy H.2 applying an affordable housing threshold of 35 per cent on public land or industrial land where there is a net loss of industrial floorspace capacity.</u></p>
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						<p>result in a net loss of industrial capacity. Indeed, the Site is not nor was it formerly in use for Class B purposes but was in sui generis use.</p> <p>This is due to the modernisation of gas infrastructure allowing these sites to perform the functions which they currently do in a more efficient manner alongside new development. 50% target on the site would reduce flexibility and conflict with London Plan.</p>	
PRN.037	R19.0227	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Note that the Revised Local Plan has amended reference from all through school to primary school and that the land should be retained unless provision has been met elsewhere. This places burden on viability. The Schools Report seeks to assess pupil demand against capacity but it does not assess the suitability of the site to meet potential primary school need having regard to school catchment areas and deliverability. There is no testing of the feasibility of delivery of the school and effect provision will have on deliverability of site and allocation as a whole. If the reservation of land for primary school is justified and sound the Revised Local Plan should provide for the need and location and form of primary school and should be determined by iterative design process</p>	<p>The Adopted Local Plan includes the allocation for an all-through school with flexibility should this be provided elsewhere. The site allocation also required retention of sufficient land for a primary school unless that need has been demonstrably met elsewhere. The schools related evidence supporting the review of the Revised Local Plan continues to highlight this potential need. Therefore the amendment to reference a primary school recognises the recent past provision but is not considered a fundamental change in approach. The NPPF sets out that plans should include infrastructure requirements of sites so this approach is in accordance with national policy.</p>

						<p>and confirm that the school site will not be required on the site.</p> <p>Provision of land for and construction of primary school is not identified in CIL Charging Schedule so there is no mechanism for fair apportionment of cost (direct and in kind) through payment of CIL. On this basis SA3.6 could be burdened with cost of provision which would exceed need arising from regeneration of the allocation and thus fails to comply with Regulation 122 of CIL Regs.</p>	
PRN.037	R19.0228	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>MOL lies to the south of the site and site has potential to maintain the openness of the MOL. Development can serve as frame to MOL and enhance its function by acting as a strategic break in built form and well-defined boundary. SA3.6 should be clear in this respect.</p>	<p>It is considered that the current text of the allocation is sufficiently clear with respect to the MOL boundary.</p>
PRN.037	R19.0229	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Site is adjacent to Rick Roberts Way LSIS which is a cluster of high quality industrial design and manufacturing uses in B2 and B8. Residential led regeneration with complementary mixed uses is most appropriate given proximity to Stratford Metropolitan Centre. Development should complement the LSIS without harming function in accordance with Policy 4.4 of London Plan and emerging policies E6 and E7 and this should be confirmed</p>	<p>Part of the site is subject to outline permission within the Legacy Communities Scheme. This will be revisited in the context of East Bank proposals however it is considered appropriate for predominantly residential development alongside a primary school and open space. As set out within the Adopted Local Plan allocation should the school no longer be required residential capacity could be increased along</p>

						within the Local Plan review.	with introduction of business space.
PRN.037	R19.0230	C303	Sub Area 3	SA3.6	St William Homes LLP	<p>Principle of residential use confirmed by SA3.6 and LCS permission. Allocation is for mixed use development including residential. The site should be residential led with complementary mixed uses as appropriate corresponding to proximity of Metropolitan centre and LSIS which provide focus for commercial uses. Supporting principles state that business space will be appropriate in this location however it is not located within an employment cluster as defined in Local Plan and regeneration would not fetter delivery of RRW North. Policy B.1 supports B class uses in clusters and support for encouragement of flexible uses in these locations. B.3 encourages reuse of vacant land for temporary uses. Welcome policy approach and consider potential for meanwhile uses as part of commitment to delivery.</p> <p>Principle of no net loss of industrial floorspace capacity does not apply to utility infrastructure see amendment to draft London Plan (6.4.5b). Local Plan should confirm this to be consistent with the draft London Plan para 9.3.10 which recognises vital role sites play redevelopment. Site is former gas works and is vacant. Contributions site has</p>	Noted.

						made to employment in past years is negligible or nil. Local Plan should not seek land uses that place a burden on viability and achievability of regeneration of site and undermine contribution to housing needs. Allocation provides increase in residential capacity to be secured in tandem with business space. Increase in residential capacity above 750 target should not be depend on increase in business space but through masterplanned approach. Priority should be to maximise residential delivery through high quality regeneration of the site rather than a further cost burden.	
PRN.037	R19.0231	C303	Sub Area 3	SA3.6	St William Homes LLP	SA3.6 change 303 seeks to constrain height to 30m, presumably drawing on the Characterisation Study which is a reduction from 36m. Emerging London Plan policy D8 requires plan-led approach to tall buildings and locations identified in Plans to take account of visual, functional, environmental and cumulative impacts, potential contribution to new homes, economic growth and regeneration and public transport connectivity. Building heights for the site should be established through an iterative design process. Approach would be consistent with national policy through making as much	The amendment of the wording of the allocation was to ensure consistency in approach across the sub area. The trigger for the tall buildings policy (now BN.5) remains the same across the sub area at 30m where proposals above this height will need to meet the policy tests set out within this policy.

						use as possible of previously developed or brownfield land. This would accord with the new London Plan which promotes proposals that make most efficient use of land.	
PRN.037	R19.0232	C303	Sub Area 3	SA3.6	St William Homes LLP	Housing Density and Mix (C71). SA3.6 does not indicate residential density for site and this is supported. H.1 should be reviewed in relation to draft London Plan where density matrix has been removed and replaced with design led approach to determining capacity. A policy on density should seek to ensure accordance with paras 117-123 of the NPPF. The mix of dwellings should be determined on a site by site basis having regard to characteristics and location of site and proposed developments including viability.	Policy H.1 and H.2 set out the housing mix requirements and density considerations.
PRN.037	R19.0233	C303	Sub Area 3	SA3.6	St William Homes LLP	Allocation requires redevelopment of wider site to include Local Open Space including playspace and BAP habitat. BN.7 requires proposals for major development schemes to consider provision of new high quality and publicly accessible LOS within a scheme where there is an identified qualitative or quantitative deficiency in that location. Recognises role open space and green infrastructure play in creating successful and sustainable places. Form and function of space should be determined by iterative design process	Noted

						and not be unduly prescribed and should be reflected in policy. Support for ambition for development to contribute to net gain in biodiversity and aligns with st William Vision.	
PRN.037	R19.0234	C303	Sub Area 3	SA3.6	St William Homes LLP	SA3.6 requires walking and cycling access along Greenway. Acknowledges that subject to masterplanning and viability there is scope to enhance connectivity and integrate with Greenway. Contributions sought should meet the statutory tests and CIL Regulations.	Noted
PRN.037	R19.0235	C303	Sub Area 3	SA3.6	St William Homes LLP	Site's development should respond to surrounding heritage assets including Abbey Mills Pumping station and cottages on Abbey Lane and setting of Three Mills Conservation area to south. To be addressed through comprehensive design process in accordance with para 126-129 of NPPF. Policy should describe the response.	The site allocation includes acknowledgement of the conservation area and adjacent listed buildings within its Development Principles.
PRN.005	R19.0009	n/a	Sub Area 3	SA3.6 – Rick Roberts Way	National Grid	Representations on behalf of National Grid. National grid owns and operates high voltage electricity transmission and gas transmission systems. To ensure continued safe operation of existing sites and equipment and to facilitate future infrastructure investment National Grid wishes to National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect	Noted

					<p>our assets. An electricity cable crosses SA3.6 Rick Roberts Way and statutory safety clearances must not be infringed. National grid's overhead power line are designed to have a minimum height above ground and where changes are proposed to ground levels then these should not be infringed. On request detailed line profile drawings can be provided giving height of conductors. National Grid Asset Guidance National Grid prefers that buildings are not built directly beneath its overhead lines due to amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service. Access can be difficult without disturbing occupiers. National Grid seeks to encourage high quality and well-planned development in vicinity of its high voltage overhead lines and land beneath should be used to make a positive contribution of site's development such as nature conservation, open space, landscaping areas or used as a parking court. National Grid has produced 'A Sense of Place' guidelines which look at quality development near overhead lines and offers practical solutions which assist in avoiding unnecessary sterilisation of</p>	
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						land. Should be aware of the National Grid policy to retain overhead lines in situ. Relocation will only be considered for projects of national importance identified as such by central government. National Grid requests that High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. They form an essential part of transmission system and approach is to retain. Deed of Easements for each asset prevent erection of permanent/temporary buildings or structures, changes to ground levels, storage of materials etc. Written permission is required for any works commencing within the easement strip and deed of consent is required for cross of the easement. Land Registry should be checked for the development area and plantprotection@cadentgas.com . Happy to provide further advice and can provide informal comments during policy development and additional publications are available.	
PRN.010	R19.0048		Sub Area 4		Mayor of Tower Hamlets	Supportive of references to protection of heritage assets and development to be sensitive to these assets as well as maintaining the requirement for the open space within Bromley-by-Bow	Comment noted

						(SA4.1).	
PRN.013	R19.0082		Sub Area 4	General	TfL	For clarity makes a request that references to 'Pudding Mill' are checked, as the area is called 'Pudding Mill' and 'Pudding Mill Lane' as the DLR station, for the avoidance of confusion.	Comment noted. Whilst Pudding Mill is the name of the area, Pudding Mill Lane is the name of the DLR station, and this can cause some confusion. However, references to Pudding Mill relate to changes within the area or describe the area itself whereas Pudding Mill Lane DLR station refers directly to the station. Therefore these references have been checked and, as the representation does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018), the suggested change is not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.013	R19.0084		Sub Area 4	Para 13.8	TfL	Proposes additional wording to Para 13.8 to include reference to capacity at Bromley-by-Bow station in relation to proposed improvements, as proposed for policy 4.4.	The Legacy Corporation is willing to accept the proposed minor amendment. A minor modification (MM61) to the supporting text is proposed as follows: Improvements are proposed at Bromley-by-Bow station to improve accessibility and capacity, create step-free access...

PRN.015	R19.0125	C307	Sub Area 4	Policy 4.2	Bellway Homes (Thames Gateway)	Supportive of new connections in the sub area however suggests new wording around provision of new bridges and related utilities infrastructure and viability, to ensure that requirements are not overly onerous on development.	The proposed change is noted. However, it does not relate to a change proposed to the Adopted Local Plan as identified in the 'Revised Local Plan Schedule of Changes (Regulation 19 Publication Draft) (November 2018). Only one change has been made to Policy 4.2 to delete reference to a cycle superhighway route along Stratford High Street which has been delivered since the date of the Adopted Local Plan. The suggested change is, therefore, not considered to be necessary in order to make the Revised Local Plan sound or compliant with national planning policy or achieve general conformity with the London Plan.
PRN.034	R19.0201		Sub Area 4	Policy 4.2	Canal & River Trust	Sets out the Canal and River Trust role in relation to the canal network in the area. Highlights consultation requirements and consents that would be required in relation to a new bridge across Bow Back River.	Comment noted. The proposal for a new bridge across the Bow Back River is a reference that has been maintained in the Revised Local Plan from the Adopted Local Plan. At such time as this proposal should come forward it would be subject to the requirements around permissions and relevant consultation.
PRN.013	R19.0083	C308	Sub Area 4	Policy 4.3	TfL	Proposes that the word 'capacity' is added to policy 4.4 to reflect the true nature of proposed works and improvements to Bromley-by-Bow station.	The Legacy Corporation is willing to accept the proposed minor amendment to the proposed change. A minor modification (MM60) to the policy is proposed as

							follows: In considering proposals to improve Bromley-by-Bow Station, to further enhance the existing improvements that have been made, the Legacy Corporation will support proposals that improve accessibility <u>and capacity</u> to and within the station and enhance its visual presence within the area.
PRN.005	R19.0008	n/a	Sub Area 4	SA4.1	National Grid	Identifies National Grids responsibilities in owning and managing the power distribution network and the need for development proposed for sites within the vicinity of these assets to take these into account. Identifies proposed sites crossed or in close proximity to National Grid infrastructure: SA4.1 Bromley-by-Bow: Underground Cable – 262273 Underground Cable - 262249	Comment noted
PRN.038	R19.0238	C312	Sub Area 4	SA4.1	British Land	Sets out what is included in the Bromley-by-Bow site allocation and focuses on the allocation as a district centre and the inclusion of up to 50,000sq.m of retail floorspace. Suggests that due to Retail Study undertaken as part of the Local Plan Review does not support the designation as a District Centre and the need for retail floorspace at this location has not been demonstrated to this level. Suggests this be amended to	Comment noted. As part of the Legacy Corporation's Local Plan Review a robust evidence base has been produced, this includes evidence in relation to retail and the economy in the area. This evidence continues to support the area as a proposed District Centre, yet to be designated. Designation would only take place where development delivery had achieved the required floorspace targets. The retail and

						<p>a Neighbourhood Centre and that this is reflected in the wording around retail floorspace stating 5,000-50,000 square meters, reflecting the Draft New London Plan and that the level of retail that should come forward should reflect what is viable. Also challenges the levels of development in relation to PTAL ratings in the area which it states are unlikely to change, even with the junction works that are due to take place in the area.</p>	<p>town centre needs assessment provides a forecast which continues to support the area as a proposed District Centre. Whilst no material change has been made to the site allocation, it is considered that the glossary should be updated to reflect changes in relation to retail floorspace definition for district centres. The Legacy Corporation is willing to accept the proposed minor amendment of the reference to quantum of retail floorspace in district centres..</p> <p>A minor modification (MM65) to the glossary is proposed as follows:</p> <p>'Glossary - District Centre... Typically they contain 5,000 10,000-50,000 sqm...'</p>
PRN.038	R19.0239	C312	Sub Area 4	SA4.1	British Land	<p>Queries the case for the inclusion of a primary school as part of the site allocation at Bromley-by-Bow. Suggests the evidence for need for a school on the site be re-examined to confirm that a facility such as this is needed here, and that the wording be changed, so that this is only a requirement if such a re-examination of the evidence were to show that there was still a need for a school in this site allocation.</p>	<p>Comment noted. As part of the Legacy Corporation's Local Plan Review a Schools Study has been produced which clearly shows the case and need for a Primary School as part of this site allocation. The need for Primary School places in the area is further supported by evidence produced by the London Borough of Tower Hamlets as part of their Local Plan Review.</p>
PRN.015	R19.0126	C314	Sub Area 4	SA4.3	Bellway Homes	<p>Sets out Bellway's currently position</p>	<p>The site allocation has not been</p>

					(Thames Gateway)	and interests in the area. Supports the LLDC's continued view that Sub-Area 4 as an opportunity for extensive and comprehensive development, and that Pudding Mill under Policy SA4.3 remains a focus for new residential-led development. Have concerns in relation to principle of 25% Non-Residential Floorspace in the area, supportive in approach in relation to the wider area, however ask for clarification in the supporting text to show how the LLDC will approach this is in decision making terms to ensure that sites coming forward are not overly burdened by under delivery on other sites on Pudding Mill. The threshold does not reflect the multiple competing inputs which need to be considered in development viability, such as demolition, extensive remediation costs, construction costs, community infrastructure levy and affordable housing delivery. Reference to being "subject to viability" should be incorporated and the allocation or the supporting text should clarify that the non-residential floorspace could comprise a range of infrastructure and employment uses in Class A, the full range of Class B uses, Class D and Sui Generis uses. The Employment Land Review prepared as part of the	substantively changed from that within the Adopted Local Plan and this has been supplemented by the adopted Pudding Mill SPD (2017). The site allocation text is clear that 25% non-residential floorspace is a target across the site allocation as a whole, providing flexibility as to the appropriate level of provision on particular sites. The SPD provides further guidance on this. It is considered that this approach continues to be relevant and supported by the evidence while remaining sufficiently flexible in respect of the development of specific development proposals.
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					<p>evidence base considers Pudding Mill as a suitable location for Higher Education, and Research and Development, this is not reflected in the site allocation but is reflected in draft Policy B.6 and Objective 1 of the emerging Local Plan. Bellway remain opposed to austere positioning of non-residential uses to a central east-west street across the Pudding Mill allocation. In addition due consideration needs to be afforded to the relationship of non-residential uses with residential from an amenity perspective, non-residential uses should be encouraged along the waterways, along Cooks Road and at key nodes to encourage activity and animation. Support co-location and Intensification of Industrial Floorspace to West of Cooks Road and the amendments to the OIL within the site allocation, specifically support the change in direction to allow co-location of B1c/B2/B8 with residential. This will allow an appropriate transition between the adjoining sites to the east of Cooks Road and the OIL. In addition, the re-wording will ensure that matters such as future residential amenity will be considered in more detail by future developers when designing proposals. Challenges the Legacy Corporation's</p>	
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						record on housing delivery and asks for clarification around the portfolio approach to housing.	
PRN.015	R19.0120		Sub Area 4	SA4.3	Bellway Homes (Thames Gateway)	Welcomes the removal of the 21-meter height limit at Pudding Mill and makes the case for tall buildings on the site, sighting approval of a building close to the Bellway site at up to 30 meters and other tall buildings along Stratford High Street.	Comment noted. The 21-meter expected height for Pudding Mill has not been removed and continues to be included in section 13, Table 13. The Legacy Corporation's policy in relation to building heights is set out in policy BN.5.
PRN.036	R19.0220	C314	Sub Area 4	SA4.3	TfL Commercial	Highlights land in TfL ownership in the Pudding Mill area and aspirations around over-station development and the positive relationship this could have with a district centre. Asks for clarity around whether or not Pudding Mill Lane DLR station is included within the site allocation. Asks for the text to be amended to recognise potential development around the DLR station, including residential development, and highlights the need to optimise such development. The response also suggests extending the district centre to include the station and highlights the importance of this piece of infrastructure for the area.	Comment noted. The Pudding Mill Lane DLR station is included within the site allocation. The borders on the map referenced are indicative and whilst the national rail railways lines do mark the boundary, the DLR line lies to the south of these other railway lines. The station is acknowledged as a key piece of infrastructure within the area and as part of the key connections is clearly linked to the district centre as highlighted within the site allocation map and as such will become and integral part of the district centre.
PRN.011	R19.0054	C321	Sub Area 4	SA4.5	GLA	Sets out the types of development that would be acceptable within the SIL designation that covers SA4.5, and the context in which any land could be released from this designation. Advises that a masterplan should be produced	Comment noted. SA4.5 sets out the principles for development of the site, it does not advocate non-SIL uses within the SIL designated area. SA4.5 sets out the requirement for the production of a masterplan for

						for the site allocation.	the whole site allocation.
PRN.034	R19.0202	C313	Sub Area 4	SA4.5	Canal & River Trust	Welcomes the principle of the strong relationship and connections to the River Lee Navigation (rather than the River Lea) if SIL land is released for residential development. Expresses concerns around intensification of industrial uses and suggests a reference back to policies BN1 and BN2. The aspiration for a biodiverse open space buffer along the waterway should be balanced alongside the opportunity for more activity and natural surveillance along the waterway and towpath.	Comment noted.
PRN.055	R19.0318	C230	Sub Area 4	SA4.5	Private Individual	Sets out and provides context to the challenges of the range of uses around SA4.5 with industrial land, increasing levels of residential development nearby, the Queen Elizabeth Olympic Park and the Bobby Moore Academy school all located in close proximity to the site. Highlights the need for future industrial development to co-exist with other nearby uses is highlighted.	Comment noted. The addition within the draft Revised Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land taking into account the range of neighbouring uses and future development in the area to co-exist and to limit any impact from these neighbouring uses.
PRN.008	R19.0013	C321	Sub Area 4	SA4.5 Bow Goods Yard	LaSalle Investment Management	Supports inclusion of the new site allocation SA4.5 but objects to the proposed wording and suggests the amended wording: "Demonstrates an acceptable relationship between the rail	Comment noted, however it is considered that the current wording of SA4.5 provides a strong level of protection for the uses currently on site, especially when combined with

						and other SIL uses both within the site and the wider Fish Island South Employment Cluster SIL and any non-SIL uses proposed, including noise, air quality and visual impact, applying the 'Agent of Change' principle". Supporting development principles – "Ensure that any non SIL use does not compromise the function, access and overall operation of ongoing industrial uses in the vicinity."	the safeguarding that is in place in relation to the SIL designation.
PRN.013	R19.0085	C320	Sub Area 4	SA4.5: Bow Goods Yards (Bow East and West)	TfL	Sets out reasoning around why a masterplan should be put in place for SA4.5 to support and guide future development on the site. Whilst no wording changes are put forward, concerns around a future masterplan and the impact it might have on the transport network in the area, especially with the potential for direct road access to the A12 to be put in place, combined with TfL's role in delivering projects in the area are set out.	Comment noted. SA4.5 puts in place the requirement for the production of a masterplan for the whole site allocation. It is acknowledged that TfL will be a key consultee for any masterplan development for or planning applications within the site allocation.
PRN.053	R19.0309	C320	Sub Area 4	SA4.5	Private Individual	Sets out concerns around potential development proposals for the site, following attendance to a consultation event with regards to proposed development on the site, and the impact on local road networks if those proposals were to go forward.	Comments noted. The addition within the draft Revised Local Plan of Site Allocation SA4.5 Bow Goods Yards (Bow east and West), is intended to provide a framework for managing future proposals within these protected rail head sites that are designated as Strategic Industrial Land. Specific proposals are

							emerging for the site allocation area and a Screening Opinion has been issued by the LLDC which considers that Environmental Impact Assessment would be required. No specific timetable for submitting a planning application has been identified at this point but this is likely to have occurred by the time of the submission of the Revised Local Plan or soon thereafter. The prospective applicant is understood to have undertaken some pre-application consultation and there will be opportunity to respond to specific public consultation by the LLDC once a planning application has been received.
PRN.015	R19.0124	no change proposed	Sub Area 4	Vision	Bellway Homes (Thames Gateway)	Support the recognition of Pudding Mill as an opportunity for mixed use development and development in the area and would like to see development come forward earlier as a catalyst for future further development and investment. Development should not be held back by 'prescriptive timescales set by planning policy but should be market-driven with appropriate phasing and delivery'. Quote how the vision reflects the character on the area. Emphasis that it is important to treat each site individually on its merits.	Comment noted. The support for development in Pudding Mill is welcomed and the site allocation has been developed to support and enable development in Pudding Mill. Legacy Corporation planning policies are in place to ensure development is appropriate and provides for the needs in the area and are based upon a robust evidence base.
N/A	N/A	N/A	Table 15:	N/A	N/A	N/A	12 Reducing Car Usage – remove

			Local Plan Key Performance Indicators				from the table as 'Number of car club spaces' available does not provide an accurate measure of reducing car usage, the indicators included within 11 Managing Transport Impacts provide a far better and more accurate picture on car usage within the Legacy Corporation area, 12 Reducing car usage is therefore not fit for purpose and should be removed.
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Justification for additional changes not resulting from a representation

This table provides justification for some other modifications and minor modification proposed which are not as a direct result of representations received.

Section of the Revised Local Plan	Justification for change proposed	Change
Appendix 3- Heritage Assets (Changes Document only)		<p>MM63: (Appendix 3 as shown on page 221 of the Revised Local Plan Schedule of Changes has incorrectly omitted the following heritage assets (shown correctly on page 269 of the Illustrative version)).</p> <p>67 Warehouse at 133 -135 Stratford High Street, Non-Designated 68 The Sugar House, Sugar House Lane, Non-Designated 69 Dane Building, 7 Sugar House Lane, Non-Designated 70 Sugar House Lane Chimney 1, Non-Designated 71 Sugar House Lane Chimney 2, Non-Designated 72 Sugar House Lane Chimney 3, Non-Designated</p>
BN.11	<p>To take account of the recommendations of the Appropriate Assessment, which stated at paragraph 6.3:</p> <p><i>To reduce the potential for adverse effects on the integrity of European Sites, it is recommended that the following mitigation measure is implemented as part of the development management process: Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where:</i></p> <ul style="list-style-type: none"> • <i>The proposed development involves or requires the abstraction of water from the Lee Valley; and / or</i> • <i>An air quality assessment shows that a proposed</i> 	<p>M7: <u>Where an air quality assessment shows that a proposed development may result in significant effects on habitats within European Sites a Project Level Habitats Regulations Assessment (HRA) should be undertaken and submitted with any planning application.</u></p>

	<i>development would result in significant effects on habitats within European Sites.</i>	
BN.14	<p>To take account of the recommendations of the Appropriate Assessment, which stated at paragraph 6.3:</p> <p><i>To reduce the potential for adverse effects on the integrity of European Sites, it is recommended that the following mitigation measure is implemented as part of the development management process: Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where:</i></p> <ul style="list-style-type: none"> • <i>The proposed development involves or requires the abstraction of water from the Lee Valley; and / or</i> • <i>An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.</i> 	<p><u>M9: Where a proposed development involves or requires the abstraction of water from the Lee Valley a Project Level Habitats Regulations Assessment (HRA) should be undertaken and submitted with any planning application.</u></p>
Page 1	Error in the Adopted Local Plan	MM2: Section 4 Developing business growth, jobs, <u>higher education and training and lifelong learning</u>
Page 21	Typographical error	MM4: Planning for and bringing forward new schools
Page 225	Measurement error	MM55: 8.3ha <u>7.0ha</u>
Page 226	Measurement error	MM56: 3.5ha <u>3.7ha</u>
Page 229	Measurement error	MM58: 4ha <u>3.8ha</u>
Page 24	Typographical error	MM5: Policy 1.4 Improving the public realm in <u>Hackney</u> hackney -Wick and Fish Island
Page 260, Table 15: Local Plan Key Performance	'Number of car club spaces' available does not provide an accurate measure of reducing car usage, the indicators included within 11 Managing Transport Impacts provide a far better and more accurate picture on car usage within the Legacy	MM62- 12 Reducing Car Usage – remove from the table.

Indicators	Corporation area, 12 Reducing car usage is therefore not fit for purpose and should be removed.	
Page 277	London Plan definition omitted in error	MM67: International Centre - London's globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping, integrated into environments of the highest architectural quality and interspersed with internationally-recognised leisure, culture, heritage and tourism destinations. These centres have excellent levels of public transport accessibility.
Page 281	Definition omitted in error	MM68: Travel Plan - Travel plans are long term management strategies which should support sustainable and active travel at both new and existing developments.
Page 33, Footnote 6	Update to latest version	MM15: Homes and Communities Agency: Employment Densities Guide 2010 <u>2015</u> provides a good indication of average space per full-time equivalent employee.
Page 37, Case Study 1	Update to reflect status achieved	<p>MM16: Case Study 1: Hackney Wick and Fish Island Creative Enterprise Zone proposal</p> <p>In <u>December 2018</u> it was confirmed that the <u>joint proposal by the</u> London Legacy Corporation, London Borough of Hackney and London Borough of Tower Hamlets submitted a joint proposal for <u>was successful in receiving</u> Creative Enterprise Zone status. At the time of writing the proposal has reached the final 10 it is yet not known whether it will be successful. However, <u>An</u> extensive amount of work has taken place to promote such a CEZ within the Hackney Wick and Fish Island area. Although not a planning initiative there are clear links between the two including a shared evidence base in the Combined Economy Study (2018).</p> <p>As a Creative Enterprise Zone, HWFI would <u>will</u> benefit from an overarching economic strategy which is also supported by policies within the Local Plan, such as the emphasis on support for businesses within flourishing sectors on the economy (SP.2); protection of the current supply of a range of traditional manufacturing and heavier industries whilst encouraging the forms of appropriately located and designed workspace appropriate to new and</p>

		<p>existing creative, productive and cultural industries, enabling them to thrive within the area (B.1); and support for the provision of new affordable workspace and low cost business space secured at submarket rates in particular where existing space is present (B.4). Policies supporting the new Neighbourhood Centre at Hackney Wick also acknowledge the unique circumstances of the area and the close relationship with employment space and a model of dispersal of these uses across the centre (B.2).</p> <p>In addition, the area benefits from various socio-economic programmes and investment, including business development programmes, employment and skills programmes and community capacity building programmes. These initiatives and emerging projects fall within the categories of new creative clusters and networks; creative production space; business development; enterprise and skills; and community links and socially inclusive spaces. Together these will create a single form of governance, provide new spaces, supply chain support, showcasing a cultural strategy, partnerships with schools and other training organisations and engagement with outside community and community representatives.</p>
Para 3.2	Omitted in error	MM3: <u>Visit- Create a diverse, unique, successful and financially sustainable visitor destination</u>
Para 4.8	Update to reflect status achieved	MM7: Strengthening the foundations of creative and cultural industries including through a potential the Creative Enterprise Zone together with new economic uses at Hackney Wick and Fish Island will provide a crucial environment for the stimulation of growth, while heavier industries and transportation uses largely towards the south of the area and within the employment clusters provide for more established employment requirements.
Para 5.24	Typographical error	MM24: ...specialist viability appraisal. 31
Para 6.42	To take account of the recommendations of the Appropriate Assessment, which stated at paragraph 6.3:	M8- ...The requirements of the Habitats Directive (EC Directive 92/43/EEC on the Conservation of Habitats and Natural Fauna and Flora) are transposed into law in England and Wales by the Conservation of Habitats and Species Regulations 2017. Under Article 6 of EC Directive 92/43/EEC (the Habitats

	<p><i>To reduce the potential for adverse effects on the integrity of European Sites, it is recommended that the following mitigation measure is implemented as part of the development management process: Any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where:</i></p> <ul style="list-style-type: none"> • <i>The proposed development involves or requires the abstraction of water from the Lee Valley; and / or</i> • <i>An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.</i> 	<p><u>Directive), an assessment (Appropriate Assessment) is required where a plan or project may give rise to significant effects upon any European Sites. There are no European Sites located within the LLDC area boundary. 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. These sites are identified below.</u></p> <table border="1" data-bbox="1034 483 1968 740"> <thead> <tr> <th><u>Name of site</u></th> <th><u>Status</u></th> <th><u>Distance from LLDC boundary</u></th> </tr> </thead> <tbody> <tr> <td><u>Lee Valley Special Protection Area</u></td> <td><u>SPA</u></td> <td><u>3.4km north west</u></td> </tr> <tr> <td><u>Lee Valley Ramsar site</u></td> <td><u>Ramsar</u></td> <td><u>3.4km north west</u></td> </tr> <tr> <td><u>Epping Forest Special Area of Conservation</u></td> <td><u>SPA</u></td> <td><u>2.9km north east</u></td> </tr> </tbody> </table> <p><u>An Appropriate Assessment of this Plan has concluded that any application coming forward as a result of Local Plan designation should be subject to a detailed project level HRA where:</u></p> <ul style="list-style-type: none"> • <u>The proposed development involves or requires the abstraction of water from the Lee Valley; and / or</u> • <u>An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.</u> 	<u>Name of site</u>	<u>Status</u>	<u>Distance from LLDC boundary</u>	<u>Lee Valley Special Protection Area</u>	<u>SPA</u>	<u>3.4km north west</u>	<u>Lee Valley Ramsar site</u>	<u>Ramsar</u>	<u>3.4km north west</u>	<u>Epping Forest Special Area of Conservation</u>	<u>SPA</u>	<u>2.9km north east</u>
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<p>Para 6.51</p>	<p>To take account of the recommendations of the Appropriate Assessment, which stated at paragraph 6.3:</p> <p><i>To reduce the potential for adverse effects on the integrity of European Sites, it is recommended that the following mitigation measure is implemented as part of the development management process: Any application coming forward as a result of Local</i></p>	<p><u>M10:Paragraph 6.42 sets out the background to why a Project Level HRA may be required in the context of abstraction of water and air quality.</u></p>												

	<p><i>Plan designation should be subject to a detailed project level HRA where:</i></p> <ul style="list-style-type: none"><i>• The proposed development involves or requires the abstraction of water from the Lee Valley; and / or</i><i>• An air quality assessment shows that a proposed development would result in significant effects on habitats within European Sites.</i>	
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