

Planning Committee Report

London Thames Gateway Development Corporation

Olympic Legacy Supplementary Planning Guidance - response to public consultation

Report of the Director of Planning

1. Purpose of this report

- 1.1 This report sets out the proposed LTGDC response to the Olympic Legacy Supplementary Planning Guidance which has been published for public consultation. It is available to view on the GLA website: <http://www.london.gov.uk/consultation/olympic-legacy-supplementary-planning-guidance>. As the LTGDC does not have policy or plan making powers, it is essential that the interests of the Corporation are reflected wherever possible in emerging planning policy and guidance to assist in the delivery of the Development Corporation's objectives.
- 1.2 The LTGDC Planning Committee has responsibility for considering policy documents and providing LTGDC's formal response.
- 1.3 This report provides some background and a summary of the draft guidance, and then a suggested LTGDC response to the consultation at section 5.

2. Recommendation

- 2.1 That the Committee **Agree** that the Director of Planning respond to the consultation with comments as set out in section 5 to 10 of this report and any additional comments made by members at the meeting.

3. Background

- 3.1 Policy 2.4 of the London Plan, the 2012 Games and their Legacy, committed the mayor to preparing the Olympic Legacy Supplementary Planning Guidance to set out the Mayor's priorities for the Olympic Park and the surrounding areas. The policy goes on to say that the Boroughs should give maximum weight to the guidance when preparing their LDFs and when considering planning applications. This is therefore an important strategic planning document, for the future of the Olympic Park and the surrounding areas. The document supersedes the Lower Lea Valley Opportunity Area Planning Framework, in the areas where the two

overlap. Therefore, within the rest of the Lower Lea Valley, the OAPF still applies and is a material planning consideration.

- 3.2 LTGDC officers have been involved in earlier versions of this document, and have already commented on a number of drafts. LTGDC provided desktop publishing and transport planning support to help map and prioritise the different connectivity proposals into this document.
- 3.3 There are a number of studies that have not been published for consultation at this stage, but are likely to be published towards the end of November. These are:
 - The Integrated Impact Assessment (including an Equalities Impact Assessment).
 - Guidance on Convergence - as set out in Section 4.4 of the draft SPG.
 - The Delivery Study.
 - A Capacity Methodology report.
 - The final IIA Scoping report.
 - The Energy Study.
- 3.4 It is likely that the GLA will run a second focussed consultation from the 28th of November to the 18th of December, when consultees would be asked if they wish to add to or revise their initial comments in light of the new background documentation published.
- 3.5 Of particular interest to LTGDC are likely to be the Delivery Study and Capacity Methodology report.
- 3.6 This report therefore provides a response on the OLSPG only. Where comments may benefit from more information that is likely to be provided by the above reports, this is noted in the response.

4. Structure of the document

- 4.1 The document is set out in 4 main sections, plus appendices (section 5).
- 4.2 Section 1 includes the vision, the legacy of the games, convergence and the purpose of the guidance
- 4.3 Section 2 sets out the development principles that apply, and highlights the key areas of change. The development principles are divided into six themes covering Homes and Communities, Business and Employment, Connectivity and Transport, Urban Form, Sustainable development and Convergence.
- 4.4 Section 3 divides the area covered into five areas – the Olympic Park, Stratford, Southern Olympic Fringe (including Bromley by Bow and Sugar House Lane), Hackney Wick and Fish Island and the Northern Olympic Fringe (including Lea Bridge, Leyton and Chobham).

4.5 Section 4 is a brief section on delivery, and includes collaboration and governance, delivery mechanisms, convergence, strategic infrastructure, funding and monitoring. The section gives an overview, but the Delivery Study which will be published in late November will give more detail on the strategic infrastructure requirements, and it is assumed, more advice on where infrastructure should be located.

5. Suggested LTGDC response: General

- 5.1 Thank you for providing London Thames Gateway Development Corporation (LTGDC) with the opportunity to formally comment on this important draft Supplementary Planning Guidance (SPG). LTGDC welcome the publication of this guidance, as an important step to furthering the regeneration of this part of the Lower Lea Valley and ensuring that as the area develops further and that the Olympic Park is integrated and well connected to the areas that surround it. LTGDC are glad to have been fully involved to date in preparation of the guidance, and support the cooperative way in which it has been prepared.
- 5.2 Generally, LTGDC are supportive of the structure of the guidance and the general principles for the future development and regeneration of the area. The thrust of the SPG is in accordance with the projects that have been brought forward and momentum for change that has been led by LTGDC and our partners over the past 7 years.
- 5.3 However, there are some instances where the next version of the SPG could usefully clarify intentions, in order to provide better guidance for landowners and developers.
- 5.4 In particular, in the Southern Olympic Fringe sub area section, there are some conflicts with the Land Use and Design Briefs that have been adopted by the LTGDC to provide detailed guidance on how development at Bromley by Bow and Sugar House Lane should be brought forward. Such inconsistencies are not useful, and could provide uncertainty and conflicting advice for developers and landowners going forward as to what is expected of them. The Briefs were prepared as required by the Lower Lea Valley OAPF, which said that planning frameworks should be prepared for large sites, to show how the policy would be applied on large sites. Policy 3.7 of the London Plan also requires a plan led process for development of over 500 dwellings. The Boroughs and the GLA were fully involved in the preparation of the Land Use and Design Briefs. Tower Hamlets have adopted the Bromley by Bow Brief as a Supplementary Planning Document, and LTGDC are working with Newham to adopt the Sugar House Lane Brief. It is therefore important that no inconsistencies in the planning policy framework are introduced through the OLSPG.
- 5.5 Specific areas where the SPG should be updated after public consultation so as to reduce conflicts with briefs are set out below in our comments on section 3.
- 5.6 These comments are on the OLSPG documents only. We understand that further consultation will be taking place on a suite of accompanying documents including the Delivery Study later in the year. We will comment

further on the Delivery Study at that time, and look forward to receiving details of the consultation.

6. Comments on section 1 -Vision, Legacy, Convergence, Purpose of the guidance

- 6.1 LTGDC support the vision set out in the SPG, and the general thrust of this section.

7. Comments on section 2 – Development Principles

- 7.1 LTGDC support the 6 Development Principles set out in this section.
- 7.2 LTGDC generally support Figure 2.A.2 Family housing locations, but question whether in practice Pudding Mill Lane can accommodate family housing across the whole of the site – the impact on residential amenity of the portal for Crossrail and existing rail lines do not seem to have been taken account of enough. Newham accepted this at the EIP into their Core Strategy, and amended the policy text accordingly. The OLSPG should use the same wording.
- 7.3 LTGDC have a number of comments on Figure 2.A.3 Map of New Schools and Chobham College. The new primary school at Bromley by Bow (granted planning permission in 2010 as part of the Tesco's application) is not shown on the map. The text on page 79 for Hackney Wick Fish Island refers to a need for a new secondary school. This isn't shown on the map. LTGDC understand that the London Boroughs of Tower Hamlets and Hackney support provision of the secondary school on Fish Island East. Provided evidence is produced that shows that this level of facility is required and will serve the existing and new communities in the area, LTGDC would support a requirement for a secondary school to be provided in Fish Island East in the next version of the SPG. However, it is recognised that this has implications for Social and Community facilities in mid Fish Island, where the primary school that was to be provided in Fish Island East would need to come forward. Further comment on this issue may be provided in LTGDC's response to the Delivery Study when it is published for public consultation in late November.

8. Comments on Section 3 – sub areas

- 8.1 LTGDC consider that the division of the area into these 5 sub areas is sensible, and support the visions for each of the sub areas. Specific comments on each sub area are set out below.

8.2 Olympic Park

- 8.2.1 LTGDC do not wish to comment on this section. However, LTGDC will be commenting on the recently submitted planning application for the Legacy Communities Scheme.

8.3 Stratford

- 8.3.1 LTGDC do not wish to comment on this section.

8.4 Southern Olympic Fringe

8.4.1 Bromley by Bow and Sugar House Lane

- 8.4.2 Page 69 – a short paragraph should be provided on Bromley by Bow. It is the only area not described at present. LTGDC suggest the following wording:

“Bromley by Bow is bounded by the A12 to the west, River Lea Navigation to the north and east and London Underground and National Rail corridor to the south. Bromley by Bow station is located at the south west corner of the area. The area currently accommodates a Tesco foodstore, low grade industrial uses and sites cleared in anticipation of redevelopment. The site’s adjacency to strategic road and public transport infrastructure and waterside and heritage setting provides opportunities and constraints to new development. The site has the potential to provide an important point of access to the recreational and heritage opportunities of the Lower Lea Valley from the west, through the creation of a new district centre and its associated access and townscape improvements.”

- 8.4.3 Page 71, Homes and Communities: Despite references to the type of housing promoted at West Ham and Sugar House Lane/Three Mills, there is no mention of the aim to provide a mix of housing typologies within the District Centre and adjacent sites at Bromley by Bow;
- 8.4.4 Page 71, Business and Employment: Despite reference to Sugar House Lane/Three Mills there is no mention of the opportunity to provide highly accessible and visible commercial uses along the edge of the A12 at Bromley by Bow.
- 8.4.5 Page 71. The section on Homes and Communities talks about needing a high proportion of low density housing for families at Sugar House Lane, but it would be more appropriate to refer to medium density high family housing. Newham accepted this at the EIP into their Core Strategy, and amended the policy text accordingly. The OLSPG should use the same wording. There should be a reference to the adopted Sugar House Lane Land Use and Design Brief.
- 8.4.6 Fig 3.4.2. Bromley By Bow North i.e. the site north of Three Mills Lane should be identified as a site with the potential to

accommodate a mix of residential and employment generating uses in accordance with the Bromley by Bow Land Use and Design Brief. While the predominant use may be residential we will still require and encourage employment uses. It is suggested that on the map the site is split in the middle, with mixed use (red) shown alongside the A12 and on the northern tip, and residential (yellow) by the canal.

- 8.4.7 Fig 3.4.2 The southern two thirds of Three Mills Island should be coloured blue/purple as it will/should remain creative employment as set out in the Sugar House Lane Land Use and Design Brief. Uses on this site will also be influenced by the proximity of the Twelvetrees Crescent Gas Holder consultation/blast zones.
- 8.4.8 Fig 3.4.2 Add a “possible new primary school” within Bromley by Bow south (so that it is consistent with amended Fig 2.A.3);
- 8.4.9 Fig 3.4.4 There is a general lack of consistency between the existing and missing connections identified in the Bromley by Bow and Sugar House Lane Land Use and Design Briefs and the OLSPG. The following changes are required:
- a) Cycle/Pedestrian (blue): delete the route that runs south through Bromley by Bow south and east parallel to the railway to West Ham as this has not been promoted to date;
 - b) Cycle /Pedestrian: the route across the River Lea Navigation between Bromley by Bow north and Sugar House Lane should be added;
 - c) Cycle/Pedestrian: routes across the A12, created by the All Movements Junction (AMJ), should be specifically identified, perhaps by use of a “7a” annotation, which is also referenced on page 35. The introduction of the AMJ helps realise the development potential of Bromley by Bow and Sugar House Lane and planning for it is well advanced.
 - d) Cycle/Pedestrian riverside (green): the existing connection should be extended along the edge of Bromley by Bow North, under the A11 then over the River Lea Navigation AND south within the existing Tesco site.
 - e) Cycle/Pedestrian riverside: the missing connection is south beyond the existing Tesco site, under the railway and along the edge of the Maltings residential development;
 - f) Cycle/Pedestrian/Vehicle (red): Hunts Lane should be added as an existing route that provides access to large parts of Sugar House Lane;

- g) Cycle/Pedestrian/Vehicle: The route linking Sugar House Lane to Pudding Mill Lane is a missing connection, not an existing connection;
- h) Bridges (navy blue): the existing bridge linking Sugar House Lane to Three Mills should be added;
- i) The key includes “mode to be determined”. This should be deleted.

8.4.10 Fig 3.4.5 The promotion of 7-10 storey development along the A12 edge within Bromley by Bow north should be avoided and amended to up to 8 in accordance with the Bromley by Bow Land Use and Design Brief. The map also suggests Bromley by Bow south is redeveloped with development at 4-6 storeys when permission already exists for a development of courtyard blocks ranging in height from 7-10 storeys with a 19 storey tower (this permission reflects the district centre classification and adjacency to BBB station). The OLSPG should be amended to reflect this.

8.4.11 *West Ham*

8.4.12 Fig 3.4.2 In West Ham, showing residential south of the railway line is too simplistic. The bus depot is to the south, gas holders to the west, railway to the north and the area is separated from the station by an employment led zone. The Newham Core Strategy proposes employment led mixed use for the site, with criteria that need to be met for residential to be acceptable.

8.5 **Hackney Wick and Fish Island**

8.5.1 The text on page 79 refers to north and mid Fish Island. However, it is not clear which areas this description covers. Perhaps they should be indicated on the maps or references to street names should be given. The areas as set out in the draft Fish Island AAP could be used, in which case the OLSPG should explicitly say this.

8.5.2 If Fig 2.A.3 is amended as suggested above, Fig 3.5.2 will also need to be updated. LTGDC support the predominant land uses shown on this plan, but also recognise that the Borough LDFs may provide more precise boundaries for appropriate areas for mixed use and residential development.

8.5.3 The second paragraph on page 81 should be reworded (from the second sentence) to say:

8.5.4 “The LTGDC have acquired land around the station and are working with landowners and planning authorities to radically transform the station and its surroundings to create a new focus or “hub” for the area. This would include a redesigned and more accessible station entrance and greatly improved public realm. ~~The possibility of~~

~~creating a new north-south pedestrian link under the station should be explored by developers, landowners and planning authorities. If practical, a new north-south pedestrian link under the station should also be provided to open up the area immediately around the station and improve connectivity.~~

8.5.5 Fig 3.5.3 – shows the Greenway terminating to the east of the A12, and the route under the A12 to Victoria Park as a key local connection. It would be useful for the OLSPG to highlight that an improved connection into Victoria Park is an aspiration that all stakeholders should work together to achieve.

8.5.6 LTGDC are unclear as to the rationale for the guide to building heights on fig 3.5.4 Hackney Wick / Fish Island urban form, in particular the area identified for 11 storey plus buildings to the south of Hackney Wick Station. There is no discussion of heights in the text on urban form on page 83. It would be useful to know how the GLA reached the conclusions on heights set out on Fig 3.5.4. The map itself seems to be internally contradictory, with the label “Typical height 4-6 storeys with scope for taller elements” being referenced to the Hackney Wick AAP, which only covers the north of the railway line, and extending into areas with 2-3 storey building heights identified.

8.6 Northern Olympic Fringe

8.6.1 LTGDC do not wish to comment on this section.

9. Comments on Section 5 - Delivery

9.1.1 LTGDC support the Delivery chapter and consider that it provides a useful summary of the delivery issues. The LTGDC is likely to comment further on the Delivery and Infrastructure Study when it is released for public consultation.

10. Other matters: typographical errors

10.1.1 There are a number of typographical errors in the document, which LTGDC expect will be corrected in the final version of the document. There are however a number of factual inaccuracies / items that need to be updated for the adopted document, and these are set out in the table below, in addition to those set out in the text above. Not all typographical errors have been listed as it is assumed that the GLA will do their own proofreading.

Page number and paragraph	Error
Table 2.B.1	Table needs updating as Bromley By Bow is now classified as a district centre in the London Plan, whereas the table says it isn't.
Southern Olympic	General: the OS base for each map omits the existing bridges between Bromley by Bow/Sugar House Lane and Three Mills and

Fringe maps	the listed House Mill at Three Mills Lane. This should be corrected.
Page 69, 3rd paragraph	The Three Mills Wall River is being referred to as the Waterworks River, this should be corrected.

Date: 25 October 2011