

27 February 2018

Jules Pipe CBE  
Deputy Mayor Planning, Regeneration and Skills  
City Hall  
The Queen's Walk  
London SE1 2AA

Dear Jules

### **Draft London Plan**

Colleagues across LLDC have been reviewing the draft London Plan since its publication late last year, and I thought it would be helpful to set out the key themes that have emerged from this. Our planning team can pick these up in more detail with the London Plan team at the GLA, but equally I would be happy to meet with you to discuss further if you feel there is merit in doing so.

#### General comments

Overall, LLDC very much welcomes the policy objectives set out in the draft Plan, which fit well with our own strategic ambitions. We are currently in the process of reviewing the LLDC Local Plan, which provides an opportunity to ensure that it is developed in general conformity with the London Plan. We do wonder whether there could be merit in closer alignment with the Smart London Plan; its ambition to make London a safer, more inclusive, more efficient and more informed city through Smart Cities thinking and technologies would seem to chime well with the strategic vision articulated in this document.

Given the scope and relevance of the regeneration activity underway across the LLDC area, we were surprised to see very little reference to this in the draft Plan. The absence of any explanatory text in relation to the 'Olympic Legacy Opportunity Area' - or indeed any reference to LLDC as an organisation - is an obvious oversight, and there is much we could provide in terms of the detail of what is underway and planned here (which you, of course, will be very familiar with).

We welcome the continued identification of Stratford as a Metropolitan Centre; the potential for it to develop into an International Centre is noted, and supported by (among other things) further retail developments, the establishment of the International Quarter for London as a business and commercial hub, and the forthcoming arrival of significant cultural and educational institutions to the area. The establishment of Stratford International as an international transport hub in reality, rather than simply in name, is something we continue to push for to reflect the growing global significance of the area.

A final overarching comment on the Plan would be that there is a great deal for Local Planning Authorities to consider and to action, and in some cases priorities may be seen to be competing – for example, a drive to increase residential provision (and particularly affordable housing) could have some implications on the provision / protection of low cost and affordable workspace. As you know, this is something we have been grappling with in relation to Hackney Wick. The Plan would benefit from a clearer vision in terms of how its various elements interrelate, as well as supportive guidance to help LPAs with implementation.

In terms of specific sections:

### Spatial Development Patterns

As above, as currently drafted the Plan lacks any detail about the significant opportunities that exist in and around Queen Elizabeth Olympic Park, which include the creation of new neighbourhoods and accompanying social infrastructure, new economic hubs at Stratford and Hackney Wick, and the introduction of new higher education, research and development facilities alongside space for major cultural institutions. It's worth highlighting that Figure 2.7 in this section does not currently recognise the proposed District Centre at Bromley-by-Bow, as designated in the LLDC Local Plan in July 2015.

### Design

LLDC supports the emphasis placed on securing good design, and the use of mechanisms such as Design Codes and review panels. We have a skilled in-house design and planning team, who would be happy to share learning or provide case studies on their approach to ensuring high quality design and placemaking on major schemes. More generally, given the resource constraints encountered by many LPAs some additional guidance outlining how this should be applied in practice would be helpful.

### Housing

LLDC supports the focus on accelerating housing delivery to meet the needs of London's communities, but it should be noted that in combination, policies could have a negative impact on the delivery and supply of family housing. The Plan could benefit from more flexibility in relation to the borough-level interpretation in this respect, to ensure the maintenance of mixed and balanced communities.

In terms of increasing levels of affordable housing, the approach set out in the draft Plan and the Mayor's Affordable Housing Viability SPG is acknowledged. In particular we welcome the application of viability testing through the non-fast track schemes, which allows for other planning and infrastructure benefits that are key to achieving acceptable development and regeneration benefits to be taken into account.

### Social infrastructure

LLDC welcomes an enhanced focus on ensuring appropriate levels of social infrastructure to support new developments, especially the new policy on play and informal recreation. This is something we prioritise in all our developments, and we are working to improve connectivity in the area through walking and cycling routes. It should be acknowledged that securing delivery of health care facilities can often be difficult given the way in which Clinical Commissioning Groups operate, and there may be benefit in addressing health infrastructure requirements on a wider geographical basis rather than scheme by scheme.

### Economy

LLDC notes the identification of Stratford as a potential future reserve for CAZ-related office capacity. The scale of investment being made here is hugely significant, and the establishment of new office space at International Quarter London and Here East; the development of the Westfield retail offer; the establishment of the Culture and Education District; and improvements in transport infrastructure and connectivity – including our joint working with TfL to address existing and future pressures on Stratford station - all contribute to the area's credentials in this respect.

Many of the London Plan's policies around the delivery and support for low cost and affordable workspace have already been applied within the LLDC area, most notably in relation to the outline Hackney Wick Central Masterplan – this has a resolution to grant permission to incorporate nearly 30,000sqm of B1c workshops, of which approximately one third will be affordable or low cost. Our current Local Plan also seeks to maintain, and where appropriate intensify, industrial floorspace

capacity. We would welcome the opportunity to share our experiences in this area. As mentioned above there is a balance to be struck between protecting employment space and meeting the requirement for more housing, and more clarity would be welcome in terms of how this can be achieved in practice. The approach set out for safeguarding the capacity of and intensifying areas of Strategic Industrial Land and its functions is supported. The LLDC Local Plan Review will provide an opportunity to reinforce this approach and to consider where consolidation of uses might be appropriate.

### Heritage and culture

The approach set out in this section of the draft Plan reflects the approach taken by LLDC in terms of the role attributed to heritage in place making. Delivery of new facilities as part of the Culture and Education District will support the existing cultural infrastructure within Queen Elizabeth Olympic Park, and significant work is being undertaken in Hackney Wick and Fish Island to retain and develop cultural and creative industries under the Hackney Wick Central Masterplan. We are exploring the potential to designate a Cultural Enterprise Zone in this area through the Local Plan review. While we welcome the emphasis on developing the night time economy in the capital, it is important to ensure that this is managed in a specific and local way in order to meet the needs of existing or planned new residential communities.

### Green Infrastructure

LLDC has delivered significant areas of new high quality green space as part of its legacy transformation work and in the delivery of new development projects. Our current Local Plan identifies specific requirements for open space in specific site allocations, and the review we are currently conducting includes an open space and play space assessment to ensure it is up to date in this respect. Some guidance on the mitigation of the loss of existing biodiversity or green space as a result of small housing developments would be a useful addition to this section.

### Sustainable infrastructure

Again, LLDC has been working hard in this area, with an adopted Carbon Offset Solutions SPD in place and a heat network established around Queen Elizabeth Olympic Park which will shortly be expanded into neighbouring developments. An Energy Strategy and Infrastructure Delivery Plan are also in the process of being developed. We are pleased to see the Park referenced in this section in relation to the high levels of recycling achieved during construction; it's worth highlighting that we are also engaging with event organisers and park catering outlets to promote the circular economy, specifically the reduction of single-use plastics. LLDC welcomes policy which supports practical steps towards these goals, but cautions that targets around net zero waste may be difficult to achieve.

### Transport

The strategic approach to transport and the emphasis on healthy streets set out in the draft Plan aligns with LLDC's approach, which includes the establishment of connected walking and cycling routes within Queen Elizabeth Olympic Park; the extension of the Santander Bike scheme to the area; the ambition for car free or reduced car use on all developments; and the priority given to taking forward the connected and autonomous vehicle agenda. It could be helpful to reference the work TfL and other functional bodies are doing in relation to the deployment of unmanned aerial vehicles, an area in which there is likely to be considerable development in the period to which the draft Plan pertains. It should be noted that the fact that venues within the Park regularly host large scale events presents some challenges in terms of transporting high volumes of people in a way which aligns with the wider sustainability agenda.

LLDC welcomes the enhanced focus on freight and servicing in the draft Plan, and the encouragement given to innovation in this area. Due to the large developments taking place and facilities such as Westfield Stratford City, this is a hugely important issue for us, and we have been considering the potential of Smart Cities technology to provide last-mile schemes in the area around Queen Elizabeth Olympic Park.

Given the scale of planned development and the current pace of growth, addressing pressures at Stratford Station through improvement and upgrade works remains a significant priority. This could helpfully be emphasised by adding a reference to Table 10.1 (cost would be high; timescales 2018-2026).

Yours sincerely



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