

## OD04 Purpose of the Legacy Corporation

### **Mission and purpose of the Legacy Corporation**

The Legacy Corporation was established by the Mayor of London in 2012 with the express purpose of:

*“to use the once-in-a-lifetime opportunity of the London 2012 Games and the creation of Queen Elizabeth Olympic Park to develop a dynamic new heart for east London, creating opportunities for local people and driving innovation and growth in London and the UK.”* (London Legacy Development Corporation Mission, as reproduced within paragraph 3.1 of the Local Plan)

This mission, and the purpose, also highlighted within paragraph 3.2 of the Plan, concern the support for economic growth, infrastructure provision and liveable neighbourhoods, with a focus on improving life outcomes for communities within and around its area, and is thus not solely housing delivery oriented.

In relation to the Revised Local Plan, these statements are directly filtered down into the objectives of the Local Plan, the Strategic ‘SP’ policies, and other policies within each section.

The Legacy Corporation by way of being a ‘Mayoral Development Corporation’ is part of the Greater London Authority group of functional bodies and is directly accountable to the Mayor of London through its Board. The Legacy Corporation is directly bound by this vision and its ‘5 Year Strategy’ (LS2) which is approved by the Mayor.

The Legacy Corporation planning area is small relative to other local planning authorities covering an overall area of 486 hectares that includes a significant network of waterways, open space and infrastructure. This planning area forms part of the wider Olympic Legacy Opportunity Area (see Draft London Plan [DLP]). The DLP sets out a number of key aspirations for the Opportunity Area which include the delivery of 39,000 housing, but also crucially an indicative 65,000 jobs. This strategic direction is reflected in the DLP with Stratford being identified as a potential reserve location for CAZ office functions and the policies and site allocations of the Local Plan contribute to these economic and housing delivery targets. Achieving the key targets in the DLP would not be possible without the contribution of the Legacy Corporation area where Local Plan policies direct uses supporting economic growth and housing delivery to particular locations with more detail provided where required in the Plan's site allocations.

### **Five-year housing land supply**

Housing targets for London Planning Authorities are based on capacity across London. In line with Paragraph: 013 Reference ID: 2a-013-20190220, it is for the Mayor of London to distribute the total housing requirement across London.

The Legacy Corporation is aware that the NPPF requires a 5-year housing land supply plus a minimum of a 5% buffer. For the Legacy Corporation area this would entail identifying sites for an additional 540 homes over 5 years. The Legacy Corporation has set out within its evidence (LD27, LD33) that it holds a 5-year housing land supply plus a 1% buffer (or 129 homes). As set out within the Additional Housing Delivery Note (OD5) if a reasonable small sites/windfall assumption were included within the first five years this would increase to 2.2% (or 239 homes). Over the first five years this would leave a shortfall of 301 homes against a 5% buffer, or 1192 homes against a 20%

buffer. This note will set out how it is not considered possible to increase delivery to meet these buffers without significant harm to the local and strategic objectives.

All potentially available housing land has been assessed within the 2017 London SHLAA (RPP10) process and an additional Call for Sites process (conducted at Regulation 18 stage) did not yield any additional developable land (see Sites Report, TBP6). It can also be noted from the Policies Map (LD6) that the Legacy Corporation area is small and much of the land within the area is already subject to some form of designation or policy. Therefore as highlighted paragraph 7.17 of the Housing Delivery Explanatory Note (LD27) the Legacy Corporation is not in a position to identify any further housing sites to meet this shortfall.

The only other way of identifying further sites to deliver this shortfall would be to revisit sites already identified for other uses or designated as protected for specific environmental, amenity or infrastructure purposes. In summary it is not considered possible to do this without introducing significant harm to strategic regeneration aims and purposes of the organisation highlighted above and therefore significantly impact on the delivery of the strategy and outcomes sought through the Local Plan and associated with the wider purposes of the Legacy Corporation. It is considered that such an outcome would have significant adverse effect on the objectives of the Draft London Plan and the Local Plan in terms of delivery of jobs, economic growth, and environmental and cultural amenity and on liveability. Further detail on this is set out below in relation to strategic sites, employment land and protected open space.

### **Strategic sites**

As identified in Table 3 of the Local Plan Here East (part of SA1.5) is a designated Strategic Industrial Location (Strategic Technology Cluster) already functioning as a technology cluster. This 115,000sqm of floorspace provides a range of B1 workspace, B8 data centre, A Use Class retail floorspace, D1 education uses, and D2 conference facilities. It accommodates a number of key tenants, ranging from creative businesses, world-class academic organisations to technology entrepreneurs, such as UCL, Studio Wayne McGregor, Ford and Plexal. This is now occupied and provides over 5,000 jobs. Policy B.1 protects industrial floorspace capacity and as a SIL this location is not identified as having potential for co-location of uses. The provision of additional housing is not therefore possible without inflicting damage or loss to this valued economic driver or significantly restricting its potential for further growth. The need for retention of employment clusters is discussed in further detail below. Any alteration of the SIL boundary would need to be agreed by the Mayor of London.

Stratford Waterfront sites (SA3.2 and SA3.3) are both subject to outline permissions with elements currently under construction for cultural and education uses. These sites will provide new homes for the internationally and nationally recognised Sadler's Wells, BBC Music and the V&A (in partnership with the Smithsonian Institution), as well as University College London and University of the Arts London's London College of Fashion. These sites, known collectively as East Bank, are expected to deliver around 5,000 jobs and an estimated £1.5 billion of economic value to Stratford and the surrounding area. The consented development for these sites will also contribute to meeting housing need by delivering approximately 600 homes and 1800 student bedspaces.

As stated above, Stratford Metropolitan Centre (SA3.1) is the identified CAZ reserve with permission for over 450,000 sqm of office space, of which over 130,000sqm has already been completed and other parts of the site are also currently under construction. Table 4 of the Local Plan identifies that this location is suitable for residential with the site allocation identifying that it is expected to yield in excess of 2000 homes. Given the constrained nature of the available plots it is not considered

possible to increase residential capacity beyond this level without compromising the delivery of other town centre elements as identified within the allocation and adversely impacting on the growth capacity identified in the evidence (LEB6 Retail and Town Centre Needs Study).

Other economic objectives highlighted in Section 3 of the Local Plan concern the growth of other new town centres (see SA1.1, SA2.2, SA4.1 and SA4.3) all of which are already considered suitable for residential and thus housing capacity is already factored in to this. Table 14 of the Local Plan also sets out the infrastructure requirements of the site allocations, highlighting where sites are providing for more than just housing requirements. All site allocations already include residential delivery at densities relating to their permissions or in accordance with detailed London SHLAA methodology, also see below).

### **Employment land**

The Employment Clusters are crucial to the aim of the approach of the DLP to 'retain industrial capacity'. Local Plan Policy B.1 sets out specific criteria for the each of the cluster types (SIL, LSIS, OIL and non-designated sites) with the overall aim of retaining industrial floorspace capacity. The policy allows for the introduction of new uses in some circumstances (where identified in table 3 of the Local Plan) however this relies on retaining employment floorspace capacity. It is considered that the introduction of significant new residential within these locations would prejudice this overall strategic aim and adversely impact on their capacity and function.

### **MOL/open space release**

As identified within the Local Plan around 99 hectares of the Legacy Corporation area is designated Metropolitan Open Land, with Local Open Space in addition to this. Due its strategic nature and regional importance, Metropolitan Open Land (MoL) is given the highest level of protection within policy BN.7, equivalent to green belt land and therefore in accordance with the NPPF and the DLP this should only be released in 'exceptional circumstances' as defined by the NPPF. Local Open Space is also given protection under Local Plan policy BN.8 and is key to achieving sustainable and liveable communities therefore cannot be lost without impinging on this aim and impacting the environmental capacity of the area. The Queen Elizabeth Olympic Park parkland, alongside the legacy venues, represent some of the most significant physical and environmental benefits that have accrued from the Legacy Transformation of the area following the Olympic and Paralympic Games in 2012. These are locally, regionally and nationally significant. Any alteration to the MoL boundary is contrary to London Plan policy and would have to be agreed with the Mayor of London. Other more local open spaces and green infrastructure across the area are considered to be essential in meeting the needs of the growing and intensifying communities within the LLDC area, with this being underlined by the analysis in Open Space and Playspace Study (2018) (LEB7).

### **Densification**

The above has highlighted that there are no additional available housing sites, and that the Plan allocates or designates land to achieve the balance of uses required to deliver the strategic regeneration aims and purposes of the organisation. Therefore the only remaining option to deliver this buffer would be to intensify development on those sites considered suitable for housing delivery as identified in Appendix 2 of the Local Plan (as updated in LD35, ref M33). It is not considered possible to significantly increase delivery in these locations without impacting on design quality and

the character of the area as a whole. It is worth noting that the site capacities identified through the SHLAA process are identified as a minimum within the Plan's site allocations and are therefore not directly constrained, other than by development needing to conform to the design and other relevant policies within the Plan. Experience and monitoring since the adoption of the original Plan in 2015 have demonstrated that this approach has yielded greater delivery than originally anticipated. However, that subsequent level of delivery is now factored into the SHLAA assessment through its current methodology, limiting options for further significant intensification.

As highlighted within the Corporation's evidence 17% of housing delivery over the Plan period (see LLDC response to Inspector's Matter 5.2i ,ref LLS1) comes from additional identified capacity within the London SHLAA. As the Legacy Corporation falls within an Opportunity Area the density assumptions applied within the SHLAA are the highest within London therefore there is only considered to be very limited scope to intensify sites further, where design and other environmental policies of the Plan will be key in protecting the character and identity of the area. The Local Plan contains policies within section 6 (BN.1, BN.4 and BN.5) to maintain these high design standards and the Legacy Corporation has prepared a Characterisation Study (LEB10) to assist in the application of these. As highlighted within Policy H.1 of the Local Plan, this study will also be utilised as a tool to help boost small sites delivery within the area, however it is not considered that this is likely to deliver capacity anywhere equal to the 5% buffer of 336 units shortfall over 5 years.

In addition, it is not considered that there are any policies in the Plan that seek to constrain housing development on housing sites, for example by seeking to restrain certain forms of conversions or by having restrictive design policies.

## **Conclusion**

The Legacy Corporation has assessed all potential sources of housing supply and has concluded that it is not possible to identify any potential additional housing sites without significant harm to the Local Plan strategy and the aims of the organisation as a whole. Such harm would in turn have significant consequences for new and existing local communities who stand to benefit from the wider economic, social and environmental investment and outcomes which the Legacy Corporation is charged with delivering.