

TBP3

LEGACY
DEVELOPMENT
CORPORATION

NATURAL AND BUILT ENVIRONMENT BACKGROUND PAPER

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1. INTRODUCTION

Section 6 of the London Legacy Development Corporation's ("Legacy Corporation") Local Plan contains policies related to the natural environment and also those that are designed to help achieve a high quality built environment, which will result in sustainable and liveable places. These policies build on the character of natural and built assets provided by the network of waterways, green spaces and heritage assets. They set out how these spaces are used and protected, and how biodiversity is promoted and enhanced. Policies also cover matters that include building heights, heritage, accessible design, air quality, noise and land remediation. As part of the Local Plan review, minor changes have been made to the natural and built environment policies based on the available evidence, changes that have occurred on a national and London level, and comments received from the consultation. None of the amendments impact any of the natural and built environment strategies set out in the adopted Local Plan. This background paper outlines the rationale for the changes proposed.

2. LEGISLATIVE AND POLICY CONTEXT

Since the adoption of the Local Plan in 2015 many key policy changes have taken place, most notably the revised National Planning Policy Framework (NPPF), but also at the regional level with the preparation of the draft New London Plan. All of the changes have a number of implications for the preparation of the Local Plan policies as set out below.

The National Planning Policy Framework (NPPF) sets out the overarching Government's Planning Policies for England and how it expects these to be applied. The NPPF sets out a national policy framework which is relevant both in drawing up plans and as well as making decisions about planning applications. Local Planning Authorities should also take into consideration other planning practice guidance. This is referenced below.

The revised NPPF was issued in July 2018. Chapter 15 introduces some changes for biodiversity and the natural environment, aligning the framework with the DEFRA's 25 Year Environment Plan (2018). The revised NPPF strengthens the importance and protection of the natural environment and existing networks of habitats in planning policy, ensuring that developments result in a net gain to the environment where possible. Below are some of the key changes relevant to habitats and biodiversity and design in the Legacy Corporation's area:

Paragraph 174 states that plans should *'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity', potentially encouraging the wider use of biodiversity metrics.'*

Paragraph 171 states that plans should take a strategic approach to strengthening existing networks of habitats and green infrastructure across the local authority boundaries. It is also worth noting that reference remains to Circular 06/2005: Biodiversity and Geological Conservation which continues to provide further guidance in respect to statutory obligations for biodiversity and their impact within the planning system.

In respect to air quality, the text introduces little change and it continues to advise that plans should take account the presence of Air Quality Management Areas, as well as any appropriate measures to mitigate the impacts of new developments.

The chapter relating to good design has been re-ordered from Chapter 7 to Chapter 12. Chapter 12 'Achieving well-designed places' includes further emphasis on the importance of the role that community engagement, design review panels and design workshops play in achieving good design. Emphasis is also placed on the importance of maintaining design quality through to a development's completion. This addition will support local planning authorities (LPAs) in resisting the erosion of design quality, for example through the Non Material Amendment process. Of note is that the NPPF now requires that plans or supplementary planning documents use visual tools, such as design guidance and codes to provide maximum clarity on design.

The draft New London Plan (2017) includes minor changes in relation to the natural environment. In principle, the policies continue the strong protection for designated sites and protected or notable habitats and species, with enhancements considered from the start of the development process. The most notable change is the introduction of a new 'Urban Greening Factor' (UGF) expected to be incorporated into the major application scheme design. Draft policy suggests the use of a simple matrix to identify the appropriate amount of 'urban greening' required in new developments. The score will be judged against the recommended target of 0.4 for residential-led developments and 0.3 for predominately commercial schemes. These scores are based on factors for 'different surface cover types' that result from a review of experiences of cities worldwide that have operated a 'Green Space Factor'. The UGF should be an addition to planning policies which ensure protection to, and the provision of parks, natural habitats and other green open spaces. The UGF aims to ensure that new major developments provide a range of environmental benefits, not just biodiversity but also amenity space, while addressing urban heat island effects, sustainable drainage and people's health and wellbeing.

There is a major focus on air quality and noise mitigation within London. The draft New London Plan air quality policy includes a requirement that all new large-scale developments in London should be air quality positive, with all developments air quality neutral. Mitigating noise is now included as a design policy of the draft New London Plan, rather than a pollution policy as formerly. This policy references an Agent of Change Principle, the principle by which a party introducing a new land use is responsible for mitigating and managing the impact of that change.

Despite the increased housing numbers, the draft New London Plan commits to maintaining existing space standards for new residential developments with rigid accessibility standards. The draft New London Plan advances a design-led approach as a response to the need for high-density developments, and thus aims to place design quality at centre stage in promoting optimal densification. The design-led approach means that the appropriate site capacity is calculated on the combined bases of (1) good quality taking into consideration site characteristic and context and (2) proximity to transport links, in which case the Public Transport Accessibility Levels (PTAL) values are applied.

The importance of green infrastructure is further reflected in the **Mayor's London Infrastructure Plan 2050** and the **Green Infrastructure Task Force report (2015)**. The plan recognises the importance of green infrastructure - including green spaces, trees, rivers, and green roofs – in reducing the impacts of climate change and securing sustainable development. It also acknowledges that green infrastructure must be considered as an integral part of the city's vital infrastructure, along with transport, energy, water, waste and digital infrastructure.

In May 2018, the Mayor published the **London Environment Strategy**, setting out a vision for London's environment in 2050. This document replaces Mayor's Air Quality Strategy 2010. The Strategy covers many of the areas of environmental concerns, such as air quality improvement, maximising green infrastructure by setting a target to become at least 50 per cent greener by 2050, reducing waste, and tackling climate change. This includes a number of commitments relating to the natural environment, such as:

- To minimise air pollution
- To increase and improve green infrastructure in areas where there is the least amount of green space
- To use a new Urban Greening Factor to increase delivery of green infrastructure in new developments
- To use the planning system to protect London's biodiversity.

3. EVIDENCE BASE

In summer 2017 the Legacy Corporation conducted a comprehensive Household Survey for its planning area to inform the Local Plan review. The Survey information was used to model population projections over the Local Plan period to 2036. The projections estimate that the population of the area in 2017 was around 26,000. The forecasts anticipate that the population will increase to around 96,000 in 2031 and 108,000 in 2036. The population growth information was then used in the Open Space and Play Assessment to assess the population growth impact on open space and outdoor play provision throughout the revised Plan period. The Household Survey also provided an understanding on how residents living within the Legacy Corporation area use open spaces.

The Open Space and Play Assessment (2018) was prepared as a part of the evidence base for open space policies in the Revised Local Plan. The aim of the Assessment is to replace the Local Open Space Review that was undertaken in 2014 and provide an update to the findings of the 2014 Review. The Assessment has been carried out using the new population data to indicate where and what type of open space deficiencies exist in the area, and also to assess quality and value of the area's open spaces.

The main aims of the Assessment are to:

- Provide a complete overview of the quantum and type of open spaces within the authority planning area
- Use appropriate and current benchmark standards to give an indication of the level and accessibility of provision of open space
- Assess the quality and value of open spaces against a range of detailed criteria on experience and functionality, and
- Provide sound planning based recommendations for the future provision and enhancement of open spaces.

Key recommendations of the Assessment include the following:

- It is recognised that the Legacy Corporation area benefits from access to a wide range of quality provision, including a wide range of outdoor sports facilities. In general terms, the quality of each typology is overall high. The provision and quality are particularly high to the north of the area while those to the south and west tend to be more sporadically located and of a lower quality
- In general, accessibility is very good and it is paired with good public transport provision. There is a near total coverage of the area when using Fields in Trust standard and full coverage when using London Plan standard. There is an expectation that future needs of the area will be met to at least some level throughout the delivery of appropriate provision within a large number of strategic sites proposed within the administrative area. It is therefore important that the policies continue protecting the existing and encourage the further provision of appropriate open space typologies
- There should be a focus in policy towards improving linkages and accessibility enhancements for out of boundary provision
- There should be continuous application of the Local Plan policies to ensure new development delivers an appropriate quantum of amenity space
- The policy should seek an adequate quality of children and youth play provision.

The Flood Risk Review (2017, and 2018 addendum) was carried out, following updated flooding data published by the Environment Agency, to assess the extent and level of flood risk within the Legacy Corporation area. The Flood Risk Review provides an updated flood map and recommends changes to the way flood risk assessment of the site allocations within the Legacy Corporation area should be carried out. The Flood Risk Review was updated with an addendum, produced in September 2018 to addresses those adopted and new site allocation plots that fall within Flood Zones 2 and 3 that were not assessed in 2017 Review, in relation to the most current Environment Agency (EA) flood maps (at time of writing).

The Legacy Corporation has also conducted the **Infrastructure Delivery Plan (IDP) review**. The IDP sets out the infrastructure required to support the level of growth and new development planned in the area. The IDP considers the assessment of green and blue infrastructure and provision of indoor sports facilities.

Legacy Corporation Characterisation Study (2018). To support the established approach to design and tall buildings within the adopted Local Plan, a Characterisation Study has been prepared and published alongside the Revised Local Plan. This explores the different characters of the four Local Plan Sub Areas, providing context to the approach within the Revised Local Plan, drawing together a range of existing contextual information, including for example conservation area appraisals and design codes from permitted schemes. This provides a baseline for existing area character and, given the significant areas of new development, the permitted and agreed future character.

Other Policy and Guidance for the Area

In addition to the policy and legislation documents outlined above, there are a number of documents which have guided the policies within the Local Plan and their review. Key ones are outlined below, and a full list of all other relevant documents is provided in the section headed 'Evidence base references' at the end of Section 6 of the Revised Local Plan.

Design Quality Policy (London Legacy Development Corporation, 2012). The design quality policy identifies design principles and actions to facilitate and embed high standards of design throughout Queen Elizabeth Olympic Park and the wider London Legacy Development Corporation Area. Architectural, urban and landscape design will be essential elements for creating places within Queen Elizabeth Olympic Park, and the wider Legacy Corporation area, that are engaging, safe, usable and beautiful, and which create and maintain value over the long term (this policy is being reviewed at time of writing).

Inclusive Design Standards (London Legacy Development Corporation, 2013). These build on, update and extend the RTPI award winning standards developed by the Olympic Delivery Authority. They have been developed to have a focus on long-term regeneration and the creation of a new piece of city rather than the previous focus of stadia for the Games. This includes an entire new section on residential developments, a key aspect of the Legacy Communities Scheme. It pulls together and distils the raft of existing good practice guidance available on the accessible and inclusive design of, the public realm, residential developments, public buildings and venues. In doing so, they provide a valuable and powerful tool to support the delivery of accessible and inclusive buildings and environments.

London Plan SPG: All London Green Grid (Greater London Authority, 2012). The All London Green Grid Supplementary Planning Guidance (ALGG SPG) visualises the network of interlinked, multifunctional and high quality open spaces connecting town centres, public transport hubs, major employment and residential areas with the parks and open spaces, the Thames and the green urban fringe in London. The All London Green Grid is at the heart of the London Plan approach to the provision, enhancement and management of GI. The London Plan promotes the concept and delivery of this Grid by local authorities, developers and communities, calling for the protection, promotion, and management of London's GI; encourages the provision of new GI in the public realm to improve accessibility for all and develop new links, utilising green chains, street trees, and other components of urban greening.

Legacy Communities Scheme Green Infrastructure Strategy (London Legacy Development Corporation, 2012). The Strategy states that the Legacy Communities Scheme (LCS) provides an opportunity to enhance biodiversity within the LCS scheme area, the wider QEOP and areas across the sub-region. The overarching objectives include: Enhance habitat and species diversity in the area; Improve conservation of selected species; Increase public access to green space and wildlife; Increase habitat connectivity; Compensate for habitats lost in ground remediation, remodelling and development. In addition, the strategy highlights the importance of integrating biodiversity in development schemes by fine grain urban greening within development plots, built

up through the utilisation of ‘Multifunctional Open Space’, ‘Bio-diverse Streetscape’, ‘Green Roofs and the Built Environment’.

London View Management Framework Supplementary Planning Guidance (2012). There are some important views across the capital, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The London View Management Framework (LVMF) is designed to protect these and provides the basis for more detailed guidance on each view.

Olympic Legacy Waterways Framework (2014). This document has been produced by the Legacy Corporation and the Canal and Rivers Trust for this area, recognising the strategic value of the waterways in this area. The document is a strategic plan to take forward waterways improvements and promote the diverse functions and the active use of the waterways in the LLDC area over the next 20 years.

London Mooring Strategy (2018). The London Mooring Strategy provides an update on the current situation regarding moorings in London and sets out plans how to better address and manage the challenging issues associated with the increase in boat numbers. Moor or Less: Moorings on London’s Waterways (Canal and Rivers Trust, 2018).

The Lee Valley Regional Park Development Framework (The Lee Valley Regional Park Authority, 2011). The Park Development Framework is a suite of documents that collectively provide the blueprint for the Authorities future efforts: setting out what LVRPA aim to achieve, how to balance competing demands, and how to make best use of the limited resources available. This document is currently being reviewed and it is expected to be adopted later this year.

Lee Valley Regional Park Plan (The Lee Valley Regional Park Authority, 2000). The Park Plan consists of two parts. Part one is a Strategic Policy Framework outlining policies and objectives for the regional park, providing the strategic policy framework for its future use and development. Part two consists of particular proposals for the future use and development of individual sites and areas that collectively form the totality of the regional park.

Lee Valley Regional Park Biodiversity Action Plan (The Lee Valley Regional Park Authority, 2000). This document is a Biodiversity Action Plan (BAP) developed to address threatened species and habitats and designed to protect and restore biological systems in the Lee Valley Area. The current Lee Valley Biodiversity Action Plan has been reviewed and a revised BAP is currently out for consultation with key stakeholders.

Queen Elizabeth Olympic Park Biodiversity Action Plan (London Legacy Development Corporation, 2013). This document is an update to the 2008 Olympic Park Biodiversity Action Plan (BAP) developed to address threatened species and habitats and designed to protect and restore biological systems.

Olympic Park Biodiversity Action Plan (Olympic Delivery Authority, 2008). This document is a Biodiversity Action Plan (BAP) developed to address threatened species and habitats and designed to protect and restore biological systems. This BAP has set a precedent for all future Olympic Games by being the first BAP for an Olympic Park.

London Plan SPG: Shaping Neighbourhoods Play and Informal Recreation (Greater London Authority, 2012). This document updates and replaces the Mayor’s SPG on Providing for Children and Young People’s Play and Informal Recreation published in 2008. The guidance supports the implementation of the London Plan Policy 3.6 on ‘Children and Young People’s Play and Informal Recreation Facilities,’ and other policies on shaping neighbourhoods (Chapter 7 of the London Plan), in particular Policy 7.1 on Lifetime Neighbourhoods.

Legacy Communities Scheme Revised Global Remediation Strategy (London Legacy Development Corporation, 2013). Legacy Communities Scheme Revised Remediation Strategy sets out the requirements for addressing contamination for new schemes.

Tower Hamlets Air Quality Action Plan (London Borough of Tower Hamlets, 2017). The latest version of the document was published in 2017 and it sets out the actions that London Borough of Tower Hamlets will take to improve air quality between 2017-2022. The plan focuses on measures to reduce traffic flow and vehicle emissions, however other actions include reducing emissions from buildings and industry, greener travel and measures to raise public awareness of air pollution. It also looks at managed emissions from council fleet through a Green Fleet Strategy and all fleet comply with the Low Emission Zone, and into delivering Crossrail with reduced air impact on the residents and the environment.

Hackney Air Quality Action Plan (London Borough of Hackney, 2015). This document sets out actions to improve air quality in Hackney. The document has been assessed every year since 2006 through updates and reviews.

Newham Air Quality Action Plan Consultation Report (London Borough of Newham, 2003). The Newham Air Quality Action Plan was published in 2003 and most of measures and key actions relate to transport policies. The findings in the 2010 Update and Screening Assessment indicate that the existing AQMA area should be maintained.

Waltham Forest Air Quality Action Plan: For Public Consultation (London Borough of Waltham Forest, 2017 - 2022). The Waltham Forest Air Quality Action Plan (2017) replaces the previous action plan applicable from 2002-2016. The Action Plan sets out necessary actions to be delivered between 2017 and 2022 to improve air quality within the Borough of Waltham Forest and thereby provide a healthier place to live, work and visit.

4. KEY CHANGES

Appendix 1 sets out a schedule of changes to the natural and built environment policies within Section 6 of the Local Plan, with a brief explanation of the reason for each change. Overall, the amendments proposed to the natural and built environment policies are minor as they continue to remain relevant and in conformity with the NPPF and the adopted and draft New London Plan. The monitoring information for natural and built environment Key Performance Indicators (KPI) has also shown that these policies are effective in securing the creation of a high-quality natural and built environment, adhering to set objectives. The monitoring data can be found in Authority Monitoring Report (AMR). The AMR has been produced annually since 2015 when the Local Plan was adopted. Furthermore, as a result of the Regulation 18 Consultation on the scope of the changes of the Local Plan review, a total of 35 comments have been submitted in relation to the natural and built environment policies. All representations received during this public consultation are provided in the Early Engagement Consultation Report.

The natural and built environment policies in the Local Plan have been amended to address a small number of issues arising from the new evidence, changes within the NPPF and the draft New London Plan, monitoring data and comments received. This Background Paper will now discuss the key changes in detail and the implications of the changes on the planning strategy.

4.1 STRATEGIC POLICY

The Natural and Built Environment Strategic Policy was confirmed as sound within the Local Plan Inspector's report 2015 which highlighted that *"...the Local Plan should help achieve a high-quality environment integrating green spaces and waterways with built form, respecting heritage assets and promoting new development which achieves high standards of design and architecture."* In the absence of any substantive change in the national policy or approach within the Local Plan it is considered that the strategy and section itself is still in accordance with the NPPF.

4.2 THE WATERWAY ENVIRONMENTS (POLICY BN.2)

The adopted Local Plan recognises waterways to be a defining feature of the area; it also recognises that due to the limited investment in some parts of the waterways, some of its parts and its surrounding environments remain under-utilised. Policy BN.2 focuses on the protection and improvement of the functions of the waterways. Development proposals around the waterways are expected to provide the opportunity to utilise local assets to create high quality, distinctive waterway environments in the area, maximising the opportunity to protect and enhance biodiversity. Optimising the functions of the Blue Ribbon Network within these areas, continues to be the main priority for the Legacy Corporation. This is done by supporting improvements while preventing negative impacts on these functions. To achieve this ambition, the development proposals are required to consider the most up to date guidance for the waterways published by the Environment Agency, the Canal and River Trust and the Lee Valley Regional Park Authority, as well as relevant Biodiversity Action Plans (BAPs) and the Olympic Legacy Waterways Framework, which outline suitable locations for various functions and locally specific ambitions for the waterway environments in the area.

The monitoring of KPIs set to measure the progress of waterway environments improvement shows that continuous improvements have been achieved through a number of developments since 2015. Regulation 18 Consultation responses supported the policy and only minor amendments have been required by the Environment Agency to request 8 meters "Effective setback".

To respond to the comment, the supporting text has been amended to include that where works are proposed within 8 metres of a main river, a separate formal consent is required from the Environment Agency.

Given that the current policy has proved effective in achieving its main goals and that there have not been any major changes on the national and London level in relation to this policy, it is considered that the policy remains relevant and therefore no changes have been proposed throughout the Local Plan review. Moreover, the Legacy Corporation's Waterway Strategy is still current and all aspects of the policy remain relevant and up to date.

4.3 MAXIMISING BIODIVERSITY (POLICY BN.3)

Minor changes are proposed to Policy BN.3 and its supporting text to take account of comments received from the technical and statutory consultees during the Regulation 18 Consultation. This involved inserting wording relating to strengthening the importance of achieving the provision of good quality habitat that provides linkages into the existing network, and more explicitly seeking to find a net gain in biodiversity through all proposals. These proposed changes are strongly in line with the NPPF which places additional emphasis on the importance of protection of the natural environment in planning policy, ensuring developments result in a net gain to the environment where possible, and strengthen existing network of habitats. No substantive need to further change the policy has been identified from the evidence review or monitoring data. Moreover, Natural England response, for example, supports retention of the policy in its current form.

The draft New London Plan Policy G5 introduces a new 'Urban Greening Factor' (UGF) expected to be incorporated into major application schemes. Policy G5 suggests use of a simple matrix to identify the appropriate amount of 'urban greening' required in new developments. The score will be judged against the recommended target of 0.4 for residential-led developments and 0.3 for predominately commercial schemes. The main aim of the UGF is to ensure that new major developments deliver a suitable amount of green infrastructure that will provide a wide range of environmental benefits; not just biodiversity but also address urban heat effects, sustainable drainage and improve people's health and wellbeing. In response to the introduction of UGF within the draft New London Plan, Policy BN.3 supporting text has been amended to highlight that applications for major development schemes will be expected to provide appropriate, high-quality and well-maintained urban greening, as a fundamental element of site and building design, meeting the Urban Greening Factor target score as set in the London Plan Policy G5 Urban Greening.

4.4 METROPOLITAN OPEN LAND (POLICY BN.7, FORMERLY BN.6)

The Legacy Corporation's area includes a significant amount of Metropolitan Open Land ("MOL") that has been designated within the Adopted Local Plan. This includes the Queen Elizabeth Olympic Park, including the large portion of land owned the Lee Valley Regional Park Authority.

As highlighted earlier in the document, the Adopted Local Plan is in accordance with the NPPF and in general conformity with the London Plan. Furthermore, both the revised NPPF and the draft New London Plan reinforce protection of the MOL. It also recognises its importance in providing green infrastructure and more open spaces as a vital ingredient to the physical and mental wellbeing of an urban population.

The current policy BN.6 of the adopted Local Plan prescribes that the Legacy Corporation will protect the openness of MOL by refusing development which has an adverse impact on the openness of MOL, except in very special circumstances, and only permitting the development of ancillary facilities where the openness is maintained. This policy remains in conformity with the national policy and the adopted and emerging London Plan. Therefore, no amendments to the policy or in the extent of designated MOL have been proposed. A correction has been made to the Policies Map to designate two LOS north of Hackney Wick as Metropolitan Open Land, in accordance with the previous extent in LB Hackney Local Plan.

4.5 LOCAL OPEN SPACE POLICY BN.8 (FORMERLY BN.7)

The Legacy Corporation continues to be the beneficiary of a significant amount of open space, including 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. The Adopted Policies Map designates open spaces within the area to be protected over the Local Plan period. These designated areas are based on previous assessments of open space. The rationale for their designation is set out in the Natural Environment Background Paper 2014. The open spaces have been reviewed and in some cases updated based on the Open Space and Play Space Assessment (2018).

The approach to open space taken within the adopted Local Plan is one that essentially protects significant local open and green space areas through designation as either:

- (1) Local Open Space (which has a local protection as envisaged in paragraphs 99 and 100 of the NPPF for Local Green Space); or
- (2) Metropolitan Open Land (a London specific policy designation as defined in the London Plan and which provides an equivalent level of protection to Green Belt).

Furthermore, many of the local open spaces within the Legacy Corporation area are within ownership of the Lee Valley Regional Park whose Park Development Framework sets out the strategy for the future development and management of the Lee Valley Regional Park as a whole. The overall strategy in the Adopted and Revised Local Plan is designed to align with the Park Development Framework and, as a result, development proposals are expected to take account of the Park Development Framework where it is relevant.

A key element of the Local Plan review process is ensuring that the evidence on which its policies are based is supported by robust and up to date evidence. Section 8 of the NPPF concerns promoting healthy communities and the paragraph 96 is particularly relevant to this section, and it requires that: *“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate”*.

The draft New London Plan continues the same approach set out in the adopted London Plan, and retains policy emphasis on protecting and creating local green space and open space to address areas of deficiency. It highlights the need to link open spaces across planning authority boundaries, and it also retains the requirement for local authorities to undertake an assessment of local green and open spaces to inform policy by using the categorisation now laid-out in Table 8.1. The table 8.1 rolls forward the public open space categories from the adopted London Plan.

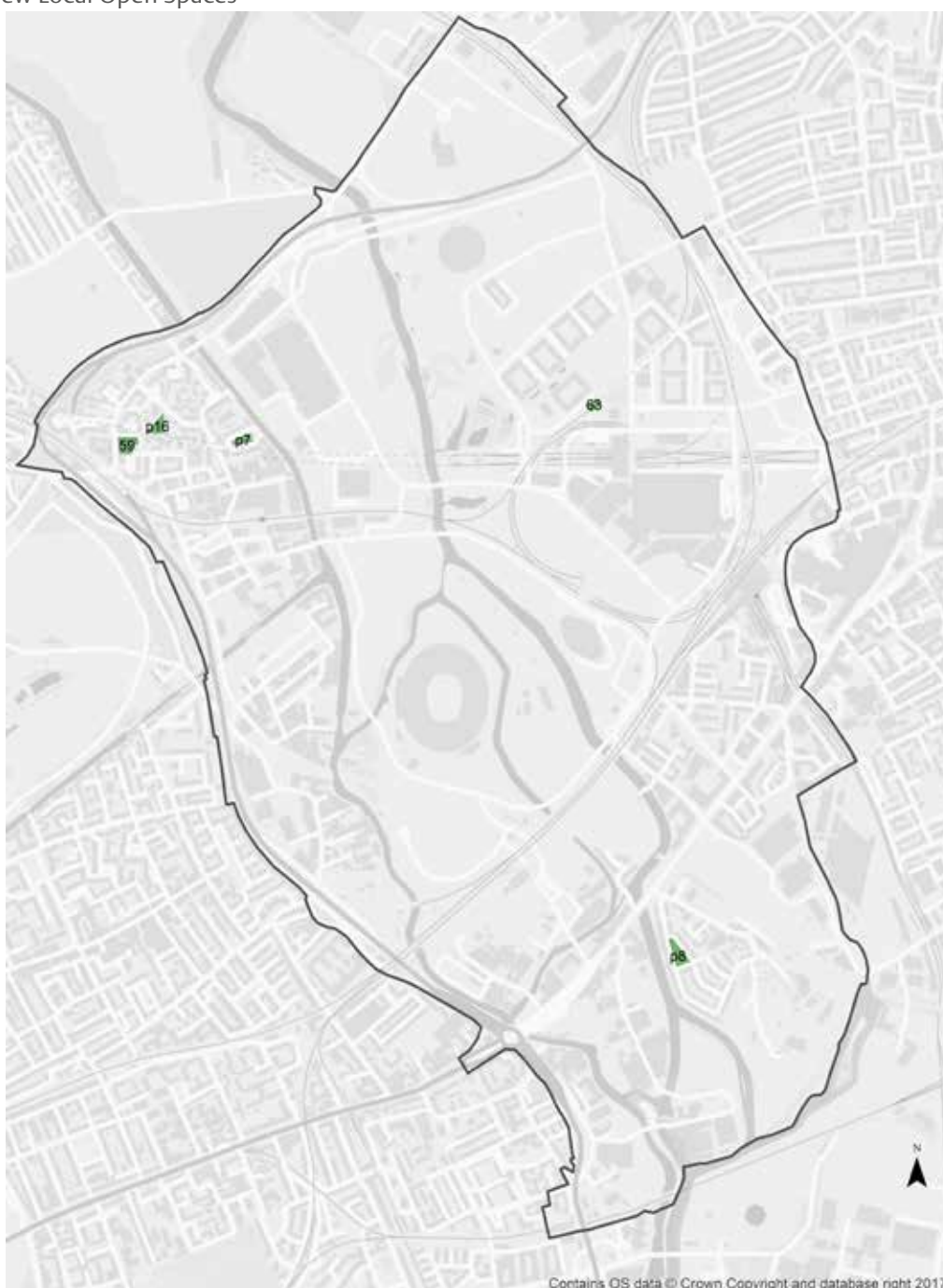
In accordance with the NPPF and draft New London Plan, the Open and Play Space Assessment (2018) was carried out to identify the quantity, accessibility and type of open spaces in the Legacy Corporation's area, including identifying any deficiencies in the area and what types of open spaces should be planned for. The quality and value of the area's open spaces have also been assessed. A key part of this assessment is the consideration of the impact of population growth on open space, play provision and outdoor sports provision throughout the Local Plan period. There is an expectation that future needs of the area will be met to at least some level throughout the delivery of appropriate provision within a large number of strategic sites proposed within the administrative area. Figure 16 of the Revised Local Plan presents an illustration as to where each of the future local open space will be provided. The Assessment recommended that the continued provision of the appropriate open space typologies should be encouraged.

Moreover, the Open Space and Play Space Assessment identified and assessed a small number of additional open spaces that are not currently designated in the Policies Map but are recognised to fulfil the criteria set out in paragraph 100 of the revised NPPF. Paragraph 100 of the NPPF states that Local Green Space designation will be appropriate only:

- *“In reasonably close proximity to the community it serves;*
- *Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Local in character and is not an extensive tract of land”.*

The Assessment concluded that these open spaces should be designated as additional Local Open Spaces through the Local Plan review. The Figure 1 below shows the location of these additional areas; these new open spaces have been designated as LOS and included in the Revised Policies Map accordingly.

Figure 1: New Local Open Spaces



Given that Policy BN.8 (formerly BN.7) remains in conformity with the NPPF and the current and draft New London Plan, and that it has shown to be effective in securing the protection of existing open spaces and the provision of new open spaces, it is considered that the policy remains relevant and no changes to the policy approach are proposed.

To ensure that the appropriate amount and typologies are delivered through further proposals, minor changes have been proposed to the supporting text of the policy to provide a reference to the Open and Play Space Assessment 2018. Furthermore, a schedule and map of all designated open spaces and their identified function(s) is added as an Appendix 4 to the Revised Local Plan to support the requirement laid in point 1 of policy BN:8 that requires development proposals affecting LOS to protect and/or enhance its function, quality and character. The schedule and map are also attached as Appendix 2 to this document.

4.6 MAXIMISING OPPORTUNITY FOR PLAY (POLICY BN.9, FORMERLY BN.8)

Adopted Local Plan Policy BN.8 (Maximising opportunity for play) emphasises the importance of contributing to inclusive and active communities and environmentally friendly environments that enhance the network of green infrastructure. It is recognised that play spaces are critical to improving young people's health. The policy requires major development proposals to improve or provide new play spaces where the deficiencies are identified. It also requires development proposals to consider all current relevant guidance and standards including a reference to relevant Boroughs Play Space Strategies and the current Mayor's Shaping Neighbourhoods Play and Informal Recreation SPG (September 2012).

The Open Space and Play Assessment (2018) has identified a deficit in the provision of young people's recreational spaces across the area when measured against the 0.25ha/1,000 benchmark standard. This is particularly relevant for the provision of Local Areas for Play - normally small landscaped areas of open space designed for young children (aged under six). Therefore, the policy will continue to pursue relevant developments to take account of the existing or future need for play space in the local area incorporating the most appropriate type of new play space into the proposal where relevant.

During the Regulation 18 Consultation process, the Legacy Corporation held two workshops with young people aged 19 and under to encourage young people to participate in the decision-making process and amplify their voice in the Local Plan review process. Full details about those workshops are set within the Early Engagement Consultation Report. During the consultation, young people raised an issue of lack of provision of appropriate youth spaces and a general lack of consideration of young people's' needs in the design of public youth space.

In response to the comments raised during these consultations, and in line with the best practice, the Mayor's Shaping Neighbourhoods Play and Informal Recreation SPG and the draft New London Plan, minor changes are proposed to the policy and supporting text to emphasise the different needs that different age groups may have, particularly young people and teenagers. The changes are proposed to emphasise that proposals should deliver provision appropriate for different age groups, and it also highlights the importance of a meaningful engagement with the recipients from an early stage to ensure its relevance to the users and general success.

4.7 AIR QUALITY (POLICY BN.11)

The Assessment of London's Environment, conducted to evaluate the current condition of London's environment, has identified air quality and noise to be among the main environmental issues facing London today. The issues identified in the assessment have informed the development of the recently published London Environment Strategy (2018)("LES").

The LES sets out a vision for London Environment in 2050 and it is one of seven strategic documents the Mayor will use to deliver his vision for London. London planning authorities are important partners in the delivery of all these strategies. It also worth noting that this document replaces Mayor's Air Quality Strategy 2010.

The LES states that the current air pollution level in London is '*dangerously – and illegally – poor*'. It places tackling this issue as the highest priority and identifies poor air quality as being the most pressing environmental threat to the future health of London. The issues and strategy identified within the LES have informed the development of the draft New London Plan, with new Policy SL1 requiring that all new large-scale developments in London should be air quality positive, meaning that applicable developments should not just minimise the impact on the local air quality but also improve on the existing situation. It is required that all other developments should be at least air quality neutral. The draft New London Plan also to prevent or mitigate increased exposure to existing air pollution and make provision to address local problems of air quality, particularly at priority locations like the Air Quality Focus Areas.

The Adopted Local Plan Air Quality policy seeks appropriate construction, design and transport planning practices, and it is in general conformity with the London Plan and policy set out within the NPPF. The policy also requires an appropriate consideration of the relevant London Borough objectives to address these issues. For this reason the substance of the current policy approach has not been changed, however policy BN.11 has been split in two policies – one for air quality and one for noise. The air quality policy builds upon the previous policy (BN.11) and includes the emphasis on improving air quality from the draft New London Plan and the accompanying LES, as well as highlighting the role that urban greening has on management and improvement of air quality if appropriately planned, implemented and maintained. The proposed mended Air Quality policy is outlined below.

Policy BN.11: Air quality

Development Proposals should contribute to improving air quality through the approach taken to energy use and energy efficiency and minimising the need for travel. Development should:

1. Be constructed and designed, including appropriate use of green infrastructure, in a manner that minimises emissions of pollutants to the air
2. Demonstrate compliance with policies in this Local plan and the London Plan which contribute to minimising the effects of emissions to the air
3. Have appropriate regard to the relevant London Borough and the London Environment Strategy 2018.

Applications for major development proposals must be at least air quality neutral and include an air quality assessment where they are located in areas identified in the most recent strategies and guidance as being significantly affected by poor air quality (by being adjacent to or within an Air Quality Management Area or London Plan Air Quality Focus Area).

4.8 NOISE (POLICY BN.12, FORMERLY PART OF BN.11)

Noise is tackled in Chapter 9 of the LES; the chapter focuses on reducing the adverse impact of noise from transport and non-transport sources. The LES recognises that the ambient noise is intrinsic to the urban environment, however, it warns that long exposure to high noise levels can have adverse health effects.

The draft New London Plan includes noise policy as a design policy rather than a pollution policy as formerly. The policy introduces an Agent of Change Principle which places the primary responsibility for mitigating the impacts of the noise generating activities on the proposed new noise sensitive development. If a noise generating use is proposed close to existing noise sensitive uses, the onus is on the new use to ensure its building or activity is designed to protect existing users from noise impacts, and vice versa.

The revised noise policy of the Local Plan addresses the LSE goals and new approach in the draft New London Plan on the 'Agent of change' principle. Furthermore, the Agent of Change principle has also been referenced as consideration in Policies B.1 and B.2. The proposed new BN:12 (Locations and maintenance of employment uses and Thriving towns, neighbourhoods and local centers, respectively) Noise policy text is outlined below.

Policy BN.12: Noise

Development proposals should contribute towards minimising the effects of noise on amenity of the occupiers and users of existing and planned new development within the Legacy Corporation Area. New development should be constructed to:

1. Minimise exposure to the adverse impacts of noise
2. Demonstrate compliance with policies in this Local plan and the London Plan that contribute to minimising the effects of noise
3. Have appropriate regard to the London Environment Strategy (May 2018)
4. Demonstrate compliance with the Agent of Change Principle by mitigating and managing noise impacts from new development and designing new development to minimise the effects on occupiers and users from existing noise sources.

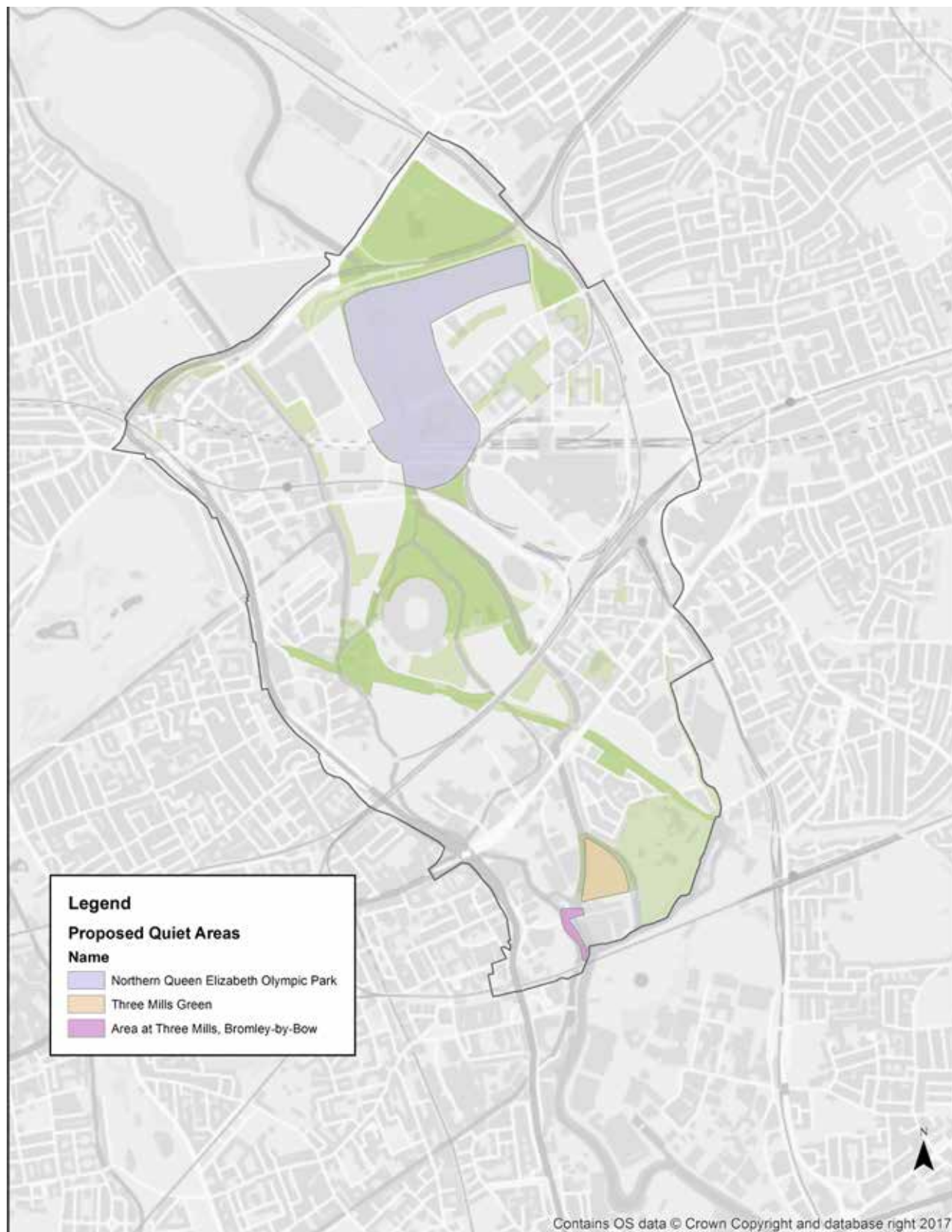
Quiet Areas

The draft New London Plan requires local planning authorities to identify and nominate new Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations. Within Defra's Noise Action Plan, Defra invites local authorities to nominate a number of their approved Local Open Spaces in local plans, for formal identification as Quiet Areas. It also clarifies that the draft New London Plan "*does not intend to set noise thresholds to steer the consideration of proposed quiet areas; determining the „quietness/or „relative quietness of these spaces and associated benefits is a matter for local discretion*". This implies that it does not mean that Quiet Areas are absent of sound, let alone noise, but that within a Quiet Area natural occurring sounds should be the dominant sound source.

To be nominated, the space will first need to be already designated as a MOL or LOS, with tranquillity being a factor in its designation, meaning that the NPPF requirements should already be met.

Taking this into consideration and other criteria set out in Appendix D of the Noise Action Plan for Agglomerations, the Legacy Corporation identified three sites for potential nomination as a Quiet Area, as shown on Figure 2. The proposal to include these areas in the Revised Local Plan was consulted on as a part of the Regulation 18 Consultation process.

Figure 2: Proposed Quiet Areas



The consultation was undertaken on the basis for the following proposed policy text:

Local Plan Authorities should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedures set in Defra's Noise Action Plan for Agglomeration.

The Policies Map and Figure X (please see Figure 2) identifies the following wider Quiet Areas:

A) Northern Queen Elizabeth Olympic Park

B) Three Mills Green

C) Area at Three Mills, Bromley-by-Bow.

Development proposals should contribute to maintain the relative tranquillity and amenity of these identified areas.

During the consultation process several comments were received objecting the necessity and appropriateness of Quiet Area designation. Some of those comments expressed concern that the designation may prevent these places to be used by the local community for social activities that potentially can benefit the area and its residents (see representation reference number R18.0326 of the Early Engagement Consultation Report, September 2018); while others also expressed their view that this would not be a strategic approach on tackling noise pollution. It was also pointed out that the proposed quiet areas are already protected from being affected by noise pollution by being designated as Metropolitan and/or Local Open Space.

Following the consultation, it was concluded that the proposed areas are not appropriate to be designated as proposed, instead a general tranquillity of these areas will be preserved through the Local Open Space Designations.

4.9 IMPROVING THE QUALITY OF LAND (POLICY BN.14, FORMERLY BN.13)

Much of the Legacy Corporation area has a history of industrial use with a range of manufacturing and other industries developing alongside significant corridors of transport infrastructure provided to serve it. In more recent times, a transition has begun to take place and many (but not all) former industrial uses have been replaced by new ones. These past uses have, in many cases, left a legacy of contamination within the ground that, if not dealt with appropriately, has the potential to affect human health and wildlife, including the water environment and groundwater.

In some cases, significant work has been undertaken to clean up contaminated land to remove or reduce that risk, or to make it suitable for any new use that is being proposed. As stated, the area of the Queen Elizabeth Olympic Park has been subjected to significant successful remediation work. However, many remaining sites that may become available for new development within the Legacy Corporation area are likely to require some form of testing and appropriate remediation work to make them suitable for developments, including appropriate proposals for end users, drainage and construction.

Given that hazardous substances are still present on some sites, and that there have not been any major relevant policy changes at the national or London level, it is considered that the Local Plan policy remains relevant and in compliance with the NPPF and the draft New London Plan. Therefore, no changes have been proposed through the Local Plan Review. Moreover, the Legacy Corporation's Remediation Strategy is still current and all aspects of the policy remain relevant and up-to-date. Minor amendments to Figure 20 of the adopted Local Plan have been proposed to reflect current general practice, as shown in Figure 3 overleaf.

Figure 3: Revised proposed planning approval process - ground contamination and remediation

Figure 20: Proposed planning approval process – ground contamination and remediation



4.10 PROTECTING KEY VIEWS (POLICY BN.10, FORMERLY BN.9)

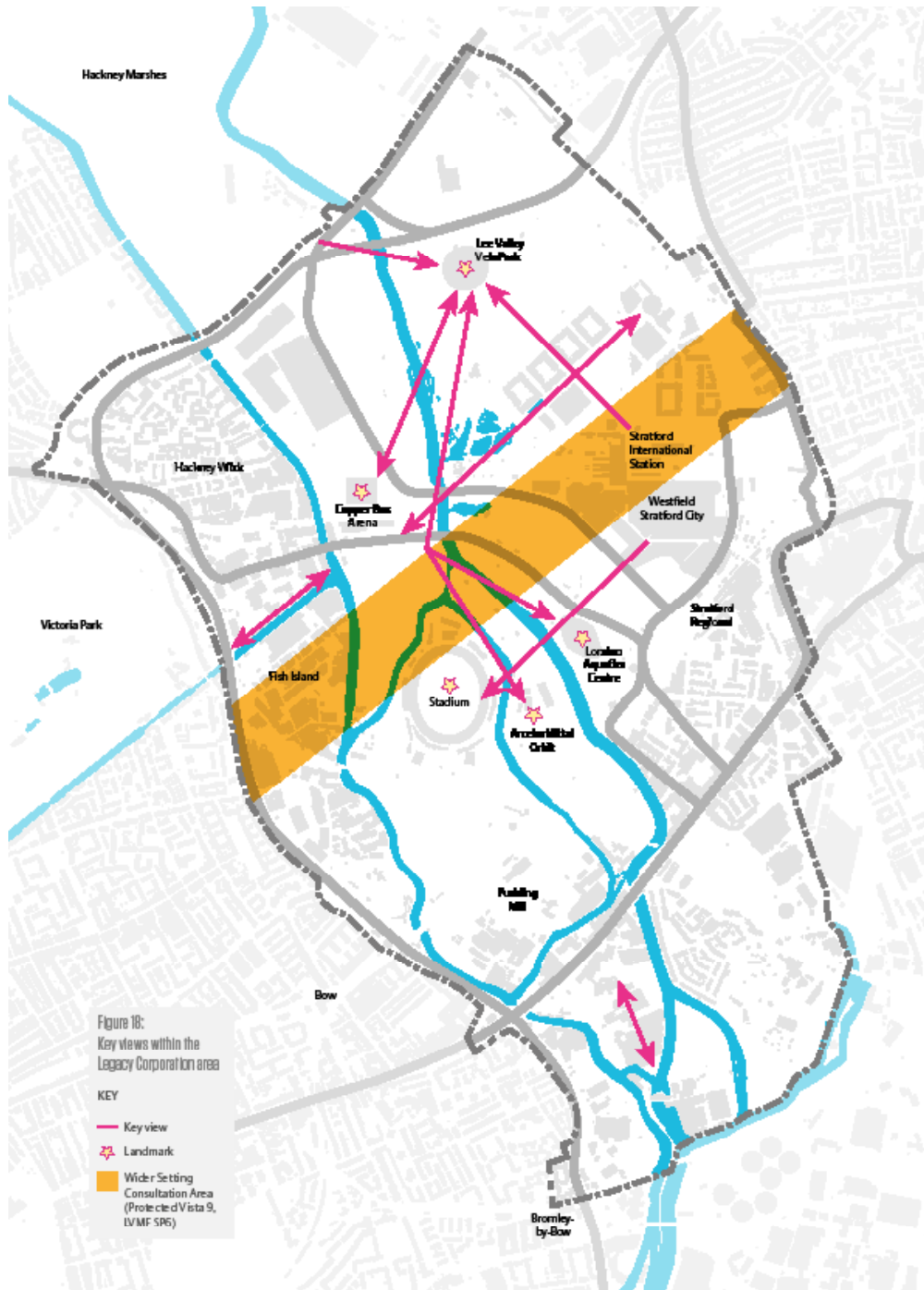
The draft New London Plan Policy HC3 (Strategic and Local Views) designates a list of Strategic Views’ as set in Table 7.1. The policy also requires local planning authorities to include all relevant designated views in their local plans, including the protected vistas. The Mayor has also prepared Supplementary Planning Guidance on the management of the designated views – the London View Management Framework Supplementary Planning Guidance (LVMF SPD).

Of relevance to the Legacy Corporation is the Background Wider Setting Consultation Area for view 9 identified within the LVMF SPD that extends to approximately Bethnal Green. The draft New London Plan has also identified a requirement to give due consideration beyond the quantifiable background consultation areas identified in the LVMF SPD. Moreover, there is an overriding requirement to consider the setting of the Grade I listed St Paul’s, in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

The LVMF view management guidance for the background assessment area of view 9 states: "Development that exceeds the threshold plane of the Wider Setting Consultation Area of the Protected Vista in the background should preserve or enhance the viewer's ability to recognise and appreciate the dome of the Cathedral. In determining applications, it is essential that development in the background of the view is subordinate to the Cathedral and that the clear sky background profile of the upper part of the dome remains".

Some high-raised developments within the Legacy Corporation areas may have an impact on the Wider Setting Consultation Area of Protected Vista 9, if this corridor were to be theoretically extended beyond Bethnal Green to Stratford. For this reason, revised policy BN.10 requires development proposals to take account of view 9 of the LVMF, where relevant. The view has also been identified in Figure 17 of the Revised Local Plan, as shown on Figure 4 below.

Figure 4: Revised Figure 18 (formerly Figure 17) Key views within the Legacy Corporation area



4.11 CONSERVATION AREAS AND HERITAGE ASSETS (POLICY BN.17, FORMERLY BN.16)

Policy BN.17 (Conserving or enhancing heritage assets) sets out the local tests for development proposals affecting heritage assets and/or conservation areas. In the Adopted Local Plan this is Policy BN.16. In reviewing the Local Plan, the opportunity to consolidate this policy with those in the sub area sections of the Local Plan was identified. Sub Area 1 contained Policy 1.4 (Preserving or enhancing heritage assets in Hackney Wick and Fish Island) and Sub Area 4 contained in Policy 4.4 (Protecting and enhancing heritage assets at Three Mills Island and Sugar House Lane). The latter policy has also been, in part replaced by the introduction of a new site allocation SA 4.4 'Three Mills'. This change is considered to be justified by the applicability of the criteria within those sub area policies to the area as a whole. The merging of these policies has also been accompanied by the introduction of a map and schedule identifying each heritage asset within the Legacy Corporation Area. The outcome of this review is therefore:

- The introduction of consolidated amendments to renumbered Policy BN.17 Conserving or enhancing heritage assets
- The deletion of sub area policies 1.4 and 4.4
- The introduction of new Figure 21, Heritage Assets
- The introduction of Appendix 3, Schedule of designated (nationally listed) and non-designated heritage assets.

Policy BN.17: Conserving or enhancing heritage assets

Proposals will be considered acceptable where they conserve or enhance heritage assets and their settings, and promote the significance of those assets by incorporating viable uses consistent with their conservation and heritage-led regeneration.

In particular, proposals for development within the boundary or immediate setting of heritage assets (see Figure 21), will be considered acceptable where they:

1. Preserve or enhance the special architectural or historic interest that has been identified within the appraisals of those heritage assets, in particular historic buildings, structures, yards, waterways and the pre-war residential and industrial street patterns or other characteristics that give that area its unique character
2. Enhance and reveal the significance of heritage assets, including the waterways, such as the Lee Navigation and Hertford Union Canal
3. Restore and reuse heritage assets located within application boundaries as part of new development and are accessible to all.
4. Exhibit an understanding of and reference the architectural and historic interest of the area within their design
5. Retain street trees and/or provide these, where appropriate.

4.12 PROTECTING ARCHAEOLOGICAL INTEREST (POLICY BN.13, FORMERLY BN.12)

The NPPF states that planning authorities should have and maintain access to a historic environment record that contains most up-to-date evidence about the historic environment in their area and use the record to “*predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future*” (Paragraph 187b).

To conform to this requirement, as part of the Local Plan review process Figure 19 (Areas covered by Archaeological Protection area) has been updated to reflect the updates to relevant boroughs Archaeological Protection Area map.

4.13 DESIGN POLICIES (BN.4 AND BN.5, FORMERLY BN.10)

Two key design policies within the Plan have been reviewed and updated. In the Adopted Local Plan these are:

- Policy BN.4, Designing residential schemes
- Policy BN.10, Proposals for tall buildings

In the Revised Local Plan (Publication Draft) these are now:

- Policy BN.4, Designing development
- Policy BN.5, Proposals for tall buildings

While the Regulation 18 consultation and engagement stage of the Local Plan review process did not highlight particular concern about the design policies as they exist, one respondent was critical of what was seen as a restrictive approach to development heights in Hackney Wick and Fish Island, while another considered the approach not to be restrictive enough. However, an internal review of how the policies have worked in practice and also a focused review of the policies with the Legacy Corporation’s Quality Review Panel, highlighted the potential to improve the clarity of these two policies. This has concluded that the overall approach in the policies remains appropriate but concluded that the policies could be made more effective through improving their clarity. Account has also been taken of the approach set out in the draft New London Plan Policy D8 (Tall Buildings). The main changes are as follows:

- Ensuring that Policy BN.4 focuses on a full range of development types rather than only residential development, with a focus on mixed-use development, which forms the predominant approach to use-mix within the LLDC area
- Moving all more generic design requirements and principles into Policy BN.4 to ensure that these are read and applied to all appropriate development proposals
- Moving Policy BN.10 Tall Buildings to BN.5 to follow directly on from Policy BN.4
- Focusing the design tests in BN.5 on matters that are specific to tall buildings, so that BN.4 and BN.10 can be clearly read and considered together by those using them.
- The locations for tall buildings element of the policy has been moved to the start of Policy BN.5 and clarified.
- The quality standard for tall buildings has been redefined from needing to be ‘Outstanding’ to being ‘Exceptionally Good’ to reflect the approach defined in the CABE and English Heritage Tall Buildings Guidance
- Policy BN.5 continues to define tall buildings in the same way as the Adopted Local Plan, by reference to specific threshold heights in each Local Plan Sub Area above which the policy will be applied
- The role of design review has been emphasised in the policies and supporting text, particularly in evidencing the appropriateness of tall building design.

To support this established approach to design and to tall buildings within the Local Plan, a Characterisation Study has been prepared and published alongside the Revised Local Plan. This explores the different areas of character on the basis of the four Local Plan Sub Areas, providing context to the approach within the Local Plan, drawing together a range of existing contextual information, including for example conservation area appraisals and design codes from permitted schemes. This provides a baseline for existing area character and, given the significant areas of new development, the permitted and agreed future character.

Policy BN.4: Designing development

All residential development (including residential development within mixed-use development) should achieve the highest possible standards and quality in both design, construction and use. To achieve this:

1. To any elements of the Annex 1 Baseline Standards that are addressed by the Nationally Described Space Standards – Technical Requirements unless they are equivalent, and
2. All mixed-use and residential development should take account of the best practice guidance in the Legacy Corporation Design Quality Policy.

Proposals incorporating residential development must also demonstrate that a high standard of liveability will be achieved by:

3. Contributing towards the creation of distinctive, integrated, legible, connected and sustainable places
4. Exhibiting the principles of good design, by incorporating high-quality landscape and architectural design, including high-quality materials (that age well over-time), finishes and details
5. Minimising adverse impacts upon existing surrounding development and not resulting in an unacceptable loss of privacy or an unreasonable degree of overlooking towards habitable rooms and private amenity spaces within or around existing development
6. Demonstrating that the scheme will receive acceptable levels of daylight and sunlight, and that existing surrounding development will not experience an unacceptable loss of sunlight and daylight in accordance with Site Layout Planning for Daylight and Sunlight (Building Research Establishment, 2011), including any future revisions or superseding guidance, and
7. Ensuring surrounding open spaces receive adequate levels of daylight and sunlight.

In meeting the above, all mixed use and residential developments should:

8. Respect the scale and grain of their context
9. Relate well to street widths and make a positive contribution to the streetscape
10. Generate an active street frontage
11. Incorporate sufficient, well designed and appropriately located communal and private amenity space
12. Contribute to defining any existing or identified new public routes and spaces

13. Promote legibility of the site; and

14. Where relevant, preserve or enhance heritage assets and the views to/from these, and contribute positively to the setting of heritage assets, including conservation areas.

Development not incorporating residential use should also take account of the Legacy Corporation Design Quality Policy and meet the relevant principles in this policy (3-14 above) to demonstrate that it achieves an acceptably high quality and contributes positively to its context. Alterations and extensions to non-residential buildings should respect the scale, proportions and materials used in the existing building. All Major development schemes should demonstrate an acceptably high quality, through independent design review undertaken by a panel appointed by the Local Planning Authority.

Policy BN.5: Proposals for tall buildings

Tall buildings should be located within the Centre boundaries outlined within this Local Plan. In order of hierarchy, these are:

- Stratford Metropolitan Centre (parts within the Legacy Corporation Area)
- Bromley-by-Bow District Centre
- Hackney Wick Neighbourhood Centre
- Pudding Mill Local Centre
- East Village Local Centre. Tall buildings are defined by the Legacy Corporation as those that are higher than a Sub Area's prevailing or generally expected height as set out in this Plan at tables 9, 10, 11, 12. Proposals for tall buildings both inside and outside the Centre boundaries will be assessed against the criteria in this policy and Policies BN.1 and BN.4. Outside of the Centre boundaries, unless a location for tall buildings is identified within a site allocation within this Plan, more than minor exceedance of the prevailing or generally expected height identified in tables 9, 10, 11, 12 will need to demonstrate that, in addition to meeting the criteria in this policy and policies BN.1 and BN.4, the proposal would achieve significant additional public benefit. Subject to the above Proposals for tall buildings will be considered acceptable where they exhibit exceptionally good design, demonstrating this through independent design review undertaken by a panel appointed by the Local Planning Authority. To achieve this, they must, in addition to meeting requirements of Policies BN.1 and Policy BN.4, demonstrate:
 1. An appropriate proportion, form, massing, height and scale in context with the character of its surroundings;
 2. Use of material appropriate to the height of the building;
 3. Acceptable access and servicing arrangements;
 4. A positive contribution to the public realm at ground level;
 5. A positive contribution to the surrounding townscape; and
 6. Creation of new or an enhancement to existing views, vistas and sightlines where there is an opportunity to do so.

Proposals for groups of tall buildings will need to demonstrate an appropriate relationship with each other and to the wider surrounding area, including the value of the group of buildings to longer distance views in addition to the immediate context.

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, coordinated with parameter plans, with these secured as part of any planning permission.

Proposals for tall buildings that are likely to have a significant adverse impact on one or more of the following will be considered unacceptable:

7. Micro-climatic conditions (specifically down-draughts and lateral winds over public or other amenity spaces)
8. Amenity of the surrounding area (including open spaces and other buildings and waterways) that relate to: overlooking, daylight, overshadowing, light spill/reflection and wider amenity impacts on existing views of landmarks, parkland, heritage assets, waterways, and views along street corridors (in accordance with Policy BN.9 Protecting Key Views).

APPENDIX 1 - KEY AREA OF CHANGES

Policy	Reason for change
Policy BN.1: Responding to place	<ul style="list-style-type: none"> Minor change made to reflect Environment Agency comments (Representation Reference Number R18.0045 and R18.0046).
Policy BN.3: Maximising biodiversity	<ul style="list-style-type: none"> Minor changes to reflect the Lee Valley Regional Park comments (R18.0012) Natural England response for example strongly supports retention in current form.
Policy BN.4: Designing residential schemes	<ul style="list-style-type: none"> To reflect the 2016 revision of the Mayors Housing SPG that now does not include Annex 1 or the 'Baseline Quality Standards'. Consideration was given to a direct reference to the Legacy Corporation Design Quality Policy, which although intended primarily to set an approach and standards for the Legacy Corporation development can also be applied to non-Legacy Corporation development in many circumstances. Wider consideration of this policy, in particular in relation to Policy BN:5 (formerly BN:10) was required following the Quality Review Panel review meeting on Local Plan design policies.
Policy BN.5: Requiring inclusive design	<ul style="list-style-type: none"> Proposed amendment is to change the policy number to BN:6 Additional text was introduced to refer to the design of non-residential elements of development.
Policy BN:6: Protecting Metropolitan open Land	<ul style="list-style-type: none"> Proposed amendment is to change the policy number to BN.7
Policy BN.7: Improving Local Open Space	<ul style="list-style-type: none"> Proposed amendment is to change the policy number to BN.8 To reflect the Open Space and Play Space Assessment (2018) To reflect the above Assessment, a new Figure 11 showing Local Open Spaces within the Area and Annex 4 listing each open space and its identified function(s) has been added.
Policy BN.8: Maximising opportunities for play	<ul style="list-style-type: none"> Proposed amendment is to change the policy number to BN.9 To reflect references to Mayor's Shaping Neighbourhood Plan and Recreation SPG To reflect comments received during the consultation with the youth groups during the Regulation 18 consultation.
Policy BN.9: Protecting key views	<ul style="list-style-type: none"> Proposed amendment is to change the policy number to BN.9 To take account of the London View Management Framework SPD (2012).

Policy BN.10: Proposals for tall buildings	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.5 • The role of design review has been emphasised in the policies and supporting text, particularly in evidencing the appropriateness of tall building design • Moving Policy BN.10 Tall Buildings to BN.5 to follow directly on from to sit next to Policy BN.4 • Focusing its the design tests in BN.5 on matters that are specific to tall buildings, so that the two policies BN.4 and BN.5 can be clearly read and considered together by those using them. As a result this is now Policy BN.5 in the Revised Local Plan (Publication Draft) • The locations for tall buildings element of the policy has been moved to the start of the policy Policy BN.5 and clarified • The quality standard for tall buildings has been redefined from needing to be 'Outstanding' to being 'Exceptionally Good' to reflect the approach defined in the CABE and English Heritage Tall Buildings Guidance • The policy continues to define tall buildings in the same way as the Adopted Local Plan (2015), by reference to specific threshold heights in each Local Plan Sub Area above which the policy will be applied.
Policy BN.11 Reducing noise and improving air quality	<ul style="list-style-type: none"> • Minor change/split of policy to separate air quality and noise policies • To reflect LES approach and the raft New London Plan requirements.
New Policy BN.12: Noise	<ul style="list-style-type: none"> • Split of policy BN:11 (Reducing noise and improving air quality) to separate air quality and noise policies • To reflect LES approach and the draft New London Plan requirements • To reflect the Agent of Change Principle.
Policy BN.12: Protecting archaeological interest	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.13 • The policy text remains unchanged, Figure 19 as been updated to reflect the updates to borough • Archaeological Protection Area map.
Policy BN.13 Improving the quality of land	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.14 • Technical updated to the policy text to ensure that the policy reflect the current practice.
Policy BN.14: Designing residential extensions	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.15.
Policy BN.15: Designing advertisement	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.16.
Policy BN.16: Preserving or enhancing heritage assets	<ul style="list-style-type: none"> • Proposed amendment is to change the policy number to BN.17 • The introduction of consolidated amendments to renumbered Policy BN.17 Conserving or enhancing heritage assets • The deletion of sub area policies 1.4 and 4.4 • The introduction of new Figure 21, Heritage Assets • The introduction of Appendix 3, Schedule of designated (nationally listed) and non-designated heritage assets.

APPENDIX 2: SCHEDULE AND MAP OF DESIGNATED OPEN SPACES AND THEIR FUNCTION(S)

Reference Number	Primary and Secondary Typology	Functions
1	Amenity Open Space/Pocket Park	The site provides a variety of amenity open space, including water features, a bandstand/events area for weekly events and grassed areas. The space opportunities opportunity for informal activities and education close to home or work or enhancement of the appearance of residential or other areas.
2	Local Park/ Outdoor Sports Facilities	A large multi-functional open space, which is a constituent park of the Lea River Park. The park contains play space, a cricket pitch, interactive art installations and seminatural open space.
3	Outdoor Sports Facilities	Formalised outdoor areas for the playing of sport, including Multi Use Game Areas. Including play area for children and young People (5 - 11 years)
4	Pocket Park/ Linear Open Space	Providing for informal play and passive recreation and nature conservation area Biodiversity and wildlife corridor. The area contains a sundial and information on native plant species as part of the 'Great British Garden'
5	Natural/Semi-Natural Open Space	Wildlife biodiversity and environment conservation
6	Natural/Semi-Natural Open Space	Wildlife biodiversity and environment conservation
7	Linear Open Space/ Green Corridors	Green corridors, opportunity for wildlife migration and leisure purpose or travel
8	Linear Open Space/ Green Corridors	Green corridors, opportunity for wildlife migration
9	Green Corridor	Green corridors, opportunity for wildlife migration
10	Green Corridor	A green corridor and visual mitigation to the highway
11	Outdoor Sports Facilities and Natural/ Semi-Natural Open Space	Wildlife conservation, biodiversity and environmental education. The Lee Valley Tennis and Hockey Centre situated on this area provides play areas for active sport recreation and leisure

12	Natural/Semi-Natural Open Space and Children and Young People play space (5 - 11 years)	This site comprises the entirety of the Queen Elizabeth Olympic Park, which is divided into six distinct subareas. The park is of sub-regional importance and contains a variety of high quality landscaped spaces, riverside walks and children's playgrounds. There is a wide range of cultural, educational and heritage features in the Queen Elizabeth Olympic Park, with a focus on legacy, sport and the Games. This site is an overarching site covering all of the sub-parcels of Queen Elizabeth Olympic Park. The park is a Regional Park, however all of the sub-parcels have been classified according to their functionality. A neighbourhood equipped area of play for specifically designated and equipped for older children but with an opportunity for younger children as well
13	Natural/Semi-Natural Open Space	LThis site comprises the entirety of the Queen Elizabeth Olympic Park. The park is of sub-regional importance and contains a variety of high quality landscaped spaces and riverside walks. The site contains a seated grassed amenity area, surrounded by riverside walkway.
14	Green Corridor	Green corridor, semi-natural open space, provides visual mitigation to the highway.
15	Amenity Open Space including Children and Young People (5 - 11 years) play space	This site comprises the entirety of the Queen Elizabeth Olympic Park. A neighbourhood equipped area of play for specifically designated and equipped for older children but with an opportunity for younger children as well. The site abuts a well landscaped verge
16	Linear Open Space/ Natural/Semi-Natural Open Space	This site forms part of the Greenway, which runs under the railway viaduct from Stratford High Street into the Olympic Park
17	Linear Open Space	Green corridors, opportunity for wildlife migration and informal activities. This site forms part of the Greenway. The site comprises natural/semi natural landscaping, a cycle path and dispersed seating.
18	Amenity Open Space	This site lies to the north of Three Mills Lane, adjacent to the House
19	Linear Open Space	The site comprised of a linear grass area running adjacent to the canal, with intermittent features, including benches, signage and canal boats.

20	Outdoor Sports Facilities - Mountain Bike Trail / Natural/Semi-Natural Open Space	The site comprises open amenity space and a mountain biking trail, which is landscaped with semi-natural woodland flowers and trees. Uses include heritage and educational features associated with the Olympics, particularly cycling. There are areas of seminatural open space with benches.
21	Children and Young People (5 - 11 years)/ Pocket Park	A park and playground set in a square, surrounded by mid-rise residential buildings
22	Amenity Open Space	Opportunity for informal activities or enhancement of the appearance of residential or the area
23	Linear Open Space/ Children and Young People (5 - 11 years)	A linear canal side park, used by both pedestrians and cyclists to travel from Hackney to the Olympic Park. The park contains moorings, children's' play space and seating, and benefits from the vibrant street scene generated by the ground-level cafe/ restaurant units at Here East
24	Natural/Semi-Natural Open Space/ Amenity Open Space	A semi-natural open green amenity space. It functions as a walkway between different sporting venues on the Olympic Park. The site includes a 9/11 memorial installation
25	Allotments	This site comprises allotment plots, bounded by the Waterworks River and the City Mill River
26	Natural/Semi-Natural Open Space	Amenity green space with paved walkways and benches, interspersed with wetland habitats. Uses include informative displays on wetland habitats, including educational signage on water glades
27	Amenity Open Space	Opportunities for informal activities close to home or enhancement of the appearance of residential or other areas
28	Amenity Open Space	Small grassed open amenity space, providing opportunities for informal activities close to home or enhancement of the appearance of residential or other areas
29	Amenity Open Space	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas.
30	Children and Young People (5 - 11 years)	This site comprises a high quality children's' playground and small open amenity space
31	Children and Young People (5 - 11 years)	This site comprises a children's' playground
32	Amenity Open Space	This site comprises a small open amenity space, which is centred upon The View Tube community hub and associated retail and cafe unit providing opportunity for leisure

33	Linear Open Space	This site comprises part of the Jubilee Greenway, which has a shared surface for both cyclists and pedestrians. The pathway is lined with greenery
34	Semi-Natural Open Space	Semi-natural open green space around the Abbey Mills Pumping Station
35	Allotments	This site comprises allotment plots
36	Outdoor Sports Facilities	This site comprises of an athletics track with a multifunctional pitch space in the field area of the track; it is located directly beside the Olympic Stadium and acts as ancillary facilities during events
37	Linear Open Space/ Amenity Open Space/	This is partially paved and partially a grassed open space located adjacent to the London Stadium providing for event Space for Olympic Stadium, and amenity
38	Children and Young People (>11 years)/ Amenity Open Space and Outdoor Gym	A neighbourhood equipped area of play, specifically designated and equipped for older children and young people
39	Amenity Open Space	A semi-natural open green amenity space
40	Chobham Academy Sports Ground	Multi Use Games Areas and cricket nets with associated parking. This site is connected to the Chobham Academy school site via a footbridge.
41	Carpenters Primary School Sports Ground	Multi Use Games Areas
42	Amenity Open Space	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas
43	Local Park including Children and Young People play space	The site provides will provide variety of amenity open spaces creating opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas

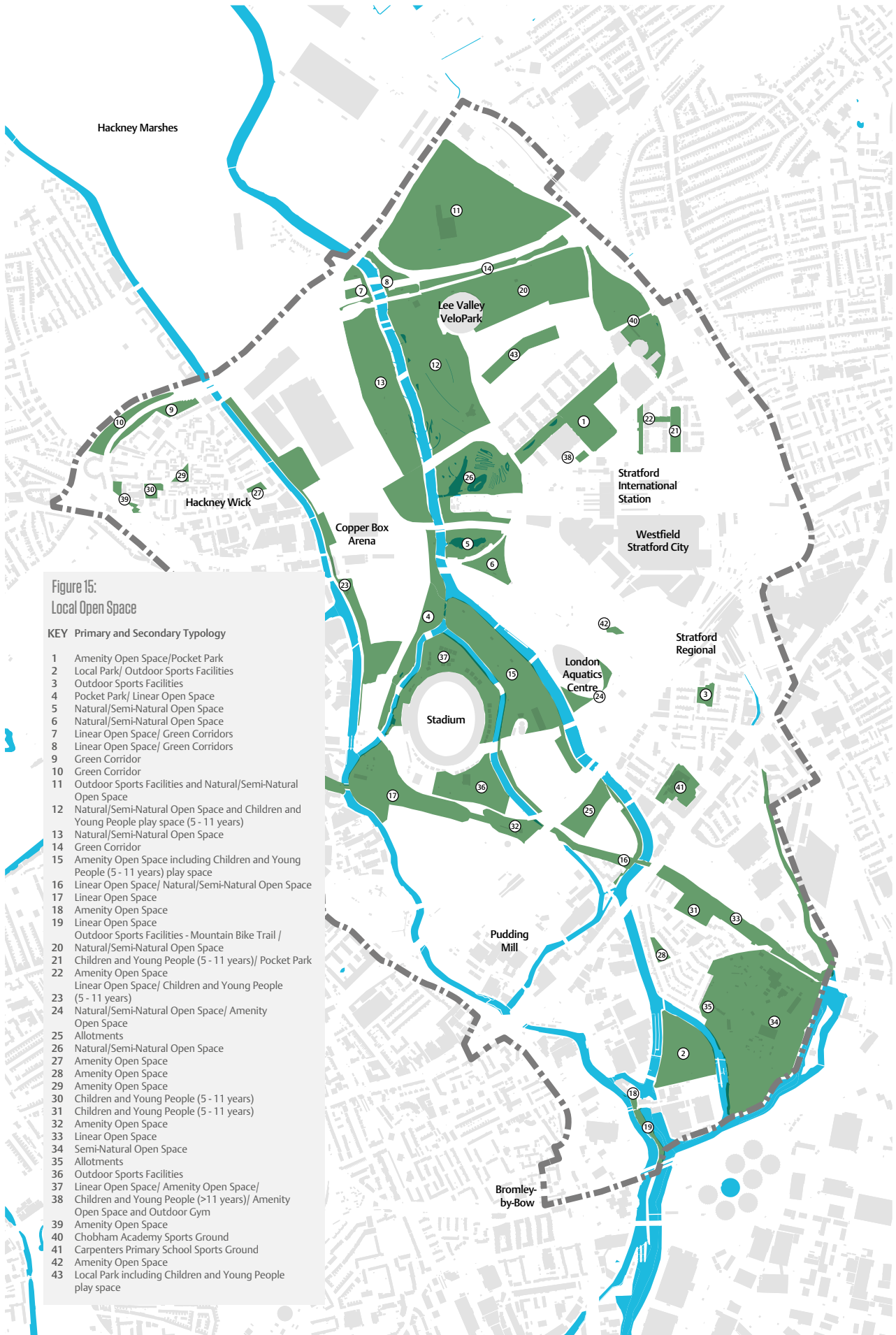


Figure 15:
Local Open Space

KEY Primary and Secondary Typology

- 1 Amenity Open Space/Pocket Park
- 2 Local Park/ Outdoor Sports Facilities
- 3 Outdoor Sports Facilities
- 4 Pocket Park/ Linear Open Space
- 5 Natural/Semi-Natural Open Space
- 6 Natural/Semi-Natural Open Space
- 7 Linear Open Space/ Green Corridors
- 8 Linear Open Space/ Green Corridors
- 9 Green Corridor
- 10 Green Corridor
- 11 Outdoor Sports Facilities and Natural/Semi-Natural Open Space
- 12 Natural/Semi-Natural Open Space and Children and Young People play space (5 - 11 years)
- 13 Natural/Semi-Natural Open Space
- 14 Green Corridor
- 15 Amenity Open Space including Children and Young People (5 - 11 years) play space
- 16 Linear Open Space/ Natural/Semi-Natural Open Space
- 17 Linear Open Space
- 18 Amenity Open Space
- 19 Linear Open Space
- 20 Outdoor Sports Facilities - Mountain Bike Trail / Natural/Semi-Natural Open Space
- 21 Children and Young People (5 - 11 years)/ Pocket Park
- 22 Amenity Open Space
- 23 Linear Open Space/ Children and Young People (5 - 11 years)
- 24 Natural/Semi-Natural Open Space/ Amenity Open Space
- 25 Allotments
- 26 Natural/Semi-Natural Open Space
- 27 Amenity Open Space
- 28 Amenity Open Space
- 29 Amenity Open Space
- 30 Children and Young People (5 - 11 years)
- 31 Children and Young People (5 - 11 years)
- 32 Amenity Open Space
- 33 Linear Open Space
- 34 Semi-Natural Open Space
- 35 Allotments
- 36 Outdoor Sports Facilities
- 37 Linear Open Space/ Amenity Open Space/ Children and Young People (>11 years)/ Amenity Open Space and Outdoor Gym
- 39 Amenity Open Space
- 40 Chobham Academy Sports Ground
- 41 Carpenters Primary School Sports Ground
- 42 Amenity Open Space
- 43 Local Park including Children and Young People play space