

Adoption and Consultation Statement for the London Legacy Development Corporation Bromley-by-Bow Supplementary Planning Document (April 2017)

In accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the London Legacy Development Corporation in its role as Local Planning Authority for its administrative area gives notice that it has **adopted** its Bromley-by-Bow Supplementary Planning Document on **27th April 2017**.

Consultation

Public consultation was undertaken between 31st October and 12th December 2016 with all parties whose details are held on the planning policy consultation list being notified by letter and/or email. The list comprises a range of statutory bodies, other bodies and organisations, including local organisations, businesses and individuals that have requested that they are consulted on planning policy matters when responding to previous consultations.

The consultation document and information on how to respond to it was also placed on the Legacy Corporation website and a paper copy made available for inspection in person at the offices of the London Legacy Development Corporation.

Thirty four individual responses were received in writing as a result of the consultation and the responses received are summarised at Appendix 1 to this statement.

Modifications

A number of minor modifications have been made to the supplementary planning document as a consequence of the consultation undertaken and these are set out as part of Appendix 1 to this statement.

Judicial Review

Any person with sufficient interest in the decision to adopt this supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision. Any such application must be made promptly and in any event not later than three months after the date on which this supplementary planning document was adopted

Appendix 1: Bromley-by-Bow SPD Consultation Response Summaries and Responses

No.	Name & Organisation	SPD section/issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
001	William Knatchbull for Assistant Commissioner (Fire Safety)	Whole document	Pump appliance access and water supplies are not addressed in the documents, however are adequate. Proposals should conform to Part B5 of Approved Document B.	Noted.	No change.
002	Ken Lyle	Whole document	<p>Should include a library at Bromley-by-Bow.</p> <p>Housing appears to include flats only, should have houses as children need gardens.</p> <p>Landowner masterplan shows pentagonal blocks which would be less practical to live in. Approve the residential blocks looking like real street at ground level.</p>	<p>Site allocation SA4.1 sets out that community uses, including a library are appropriate within the site. This also requires a significant proportion of family housing.</p> <p>The Masterplan includes homes with private amenity space and podium-level gardens.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
003	Adrian McClouchlin	Whole document	No comments included.	No change.	No change.
005	Darryl Chamberlain	Whole document	<p>Pedestrian crossings are incompatible with the motorway standard A12. Proposals are likely to increase air pollution in an area which suffers very high pollution levels.</p> <p>The Silvertown Tunnel is unlikely to decrease traffic here, therefore the Blackwall Tunnel will remain the primary cross-river route. Should have a wider plan to calm traffic on the entire stretch of road from Hackney Wick to the tunnel. It would provide a more intimidating pedestrian environment than the</p>	As identified within the SPD the crossing improvements referenced, including the toucan crossing will be developed with Transport for London. Transport for London is also responsible for the strategic road network.	No change.

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006	David Curran		<p>current subways.</p> <p>The SPD is generally well- structured and should enable sustainable development. It mentions a riverside walk; a requirement of the site allocation however is inconsistency at the southern end of the site between the various documents.</p> <p>The plan acknowledges the need for a riverside access route, and makes reference to the existing 'dead end' riverside footpath. It also notes that provision of a link under the bridge itself is currently unfunded.</p> <p>The document states that development should be generally set back from the waterway however the building massings in Zone A run right up to the riverside without any path. There is no requirement that a path be created in this location so either no path is created, or privacy issues for ground floor occupiers if a path is created. It also makes it harder to complete the current path at Twelvetrees Crescent. Furthermore, the riverside setback is likely, but not a requirement of the proposed SPD.</p> <p>The SPD should be amended to include the following for Zone A Codes to ensure design does not create future difficulties:</p> <p><u>*A12 Code: The canal edge shall incorporate a sufficient setback to accommodate a public right of way leading along the full length of the canal side, to enable future links to be made with the existing riverside path to Twelvetrees Crescent, and shall be appropriately modelled to create a positive frontage to any future canalside walk while preserving privacy for residents. Duplex units with front doors</u></p>	<p>Noted.</p> <p>Noted. There is potential for a link, which requires further investigation.</p> <p>The drawing on page 24 of the consultation draft SPD and its revised version on page 22 of the final version of the SPD identify this route as "Potential kink, subject to funding and further investigation". Section 12 of the SPD 'Environmental Design Principles' in its Water Impact section (page 53 in the consultation draft SPD and page 53-54 in the final version makes it clear that any development along this waterway edge require consultation with the Environment Agency and the Canal and River Trust and identify the zone in which this will need to be taken into account. The treatment of this edge will need to take the potential for this route into account.</p>	<p>No change.</p> <p>No change.</p> <p>No specific change proposed to the Design Codes at A.</p> <p>Amended text is included in the water impact section of Chapter 12 <i>in relation to the waterway frontage in this location.</i></p> <p>Add text to Chapter 7 'Transport and connecting the SPD area' at the end of the required by 'planning policy' text: <u>"The Local Plan identifies a potential link to the south along the waterway frontage which would pass under the railway (also shown on</u></p>

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			<p><u>on to the canalside path are encouraged to achieve this.</u></p> <p><u>* Reason: To ensure a good quality of residential environment and maintain active frontages to the street, and ensure development is brought forward within a comprehensive development framework.</u></p>		<p><u>the map at page 22 in this SPD). Any development proposal will need to show that this has been considered in providing future links as part of the Lea River Park route (The Lea River Park Primer provides further information and can be found on the Legacy Corporation website). The relationship between any development frontage and any water front route will need to be carefully and positively considered and designed."</u></p>
007	Theresa Gonet, Highways England	Whole document	No comments in relation to the safe and efficient operation of the strategic road network.	Noted	No change
008	Helena Payne, Port of London Authority	Whole document	As the area lies outside the Port of London's policy area there are no specific observations to make, however will welcome aims at enhancing the role of the waterways for drainage, biodiversity, leisure and transport.	Noted.	No change.
009	Katherine Jones, Savills on behalf of Thames Water	Whole document	Thames Water are the statutory water and sewerage undertaker and "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.	Noted.	No change.
		Page 54	Thames Water support this section in principle as it	Policy S.5 of the Local Plan	Add the following to the

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			<p>mentions water demand and waste water generation however it should be improved to deal with both water supply and wastewater/sewerage infrastructure.</p> <p>Sustainability objective for Local and Neighbourhood Plans should be coordination with infrastructure, taking into account the capacity of existing infrastructure as required by Paragraphs 156 and 162 of the NPPF and the NPPG.</p> <p>Should consider the net increase in water supply and wastewater demand to serve the development and impact of development off site, further down the network.</p> <p>It is unclear what the net increase in demand on infrastructure will be as a result of the SPD therefore developers should demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site and that it would not lead to existing user problems. It may be necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree improvements to be delivered prior to occupation.</p>	<p>ensures that major developments demonstrate that there is capacity within the water and waste water system to meet the demands of the development. This policy will be a key consideration for development proposals within the site.</p> <p>In relation to the SPD the current section deals with flooding and surface water management. However, it is recognised that this section could benefit from reference to the need to address requirements for water supply and waste water infrastructure.</p>	<p>Water Impact section (page 54 of the consultation draft SPD):</p> <p><u>“Drainage provision, including SUDs measures), should be designed to reduce the amount of surface water entering the wastewater drainage system.</u></p> <p><u>As required by Local Plan Policy S.5, development proposals will need to demonstrate that there is sufficient existing or planned water supply and waste water disposal infrastructure capacity available to meet the demands of the development. Early engagement with Thames Water is recommended.”</u></p>
		Page 54	It is the developers' responsibility to make provision	Noted. This section highlights the	See changes and

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			<p>for drainage to ground, watercourses or surface water sewers. Should reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Thames Water recognise environmental and economic benefits of surface water source control, and encourage appropriate application, however, SUDS are not appropriate for use in all areas, such as areas with high ground water levels or clay soils which do not allow free drainage and require regular maintenance to ensure effectiveness.</p> <p>Thames Water have advocated an approach to SuDS that limit the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS play a role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SUDS also help to improve water quality, provide opportunities for water efficiency, provide enhanced landscape and visual features, support wildlife and provide amenity and recreational benefits.</p>	<p>key roles of SuDS and the responsibilities of developers. The text can be amended to highlight the role of SuDS in reducing surface water entrance into the wastewater and sewerage system.</p>	<p>additions proposed above to the Water Impact Section.</p>
		Page 54	<p>Water conservation and climate change is a vitally important in relation to availability of raw water for treatment but also demand for potable (drinking) water. The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects available water resources. Thames Water supports water conservation and the efficient use of water in particular the water consumption target of 110 litres per head per day as set out in the NPPG and welcome the reference</p>	<p>Noted.</p>	<p>No change.</p>

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			to this in the SPD.		
		Page 54	<p>Thames Water recommends that developers engage with them at the earliest opportunity to establish that demand for water supply and network infrastructure, sewage/Wastewater treatment and network infrastructure, surface water drainage requirements and flood risk of the development both on and off site and can it be met. Should add the following text: <u>Water Supply, Wastewater & Sewerage Infrastructure</u></p> <p><u>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows.</u></p> <p><u>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</u></p>	As above, it is recognised that this chapter will benefit from additional wording in relation to water supply and waste water.	See changes and additions proposed above to the Water Impact Section.
011	Samantha So	Page 15	Mentions 2 toucan crossings in close proximity which appear unnecessary so close together and close to the underpass at the station.	As identified within the SPD the crossing improvements referenced, including the toucan crossings will be developed with Transport for London.	No change.
		Page 36	Concern about building height of buildings C & D2 of 9 and 15 storeys in relation to sunlight, daylight, overshadowing, wind effects, glare, loss of skyline	The masterplan is accompanied by a series of environmental testing documents including	No change.

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			and monopolising the area around 1-2 miles of the site.	daylight and wind. Applicants will be required to consider these issues further as part of any planning application.	
		Whole document	<p>Understanding is that the SPD is guidelines for developers, however if this is not followed will it be rejected? Therefore could there be possibility that phases look different to present.</p> <p>Concern about the length of the development and the noise and disruption to local residents. Will utility infrastructure be increased with the development and who will pay for this?</p>	<p>The masterplan is considered illustrative showing how the principles within the SPD can be delivered within the site. There is potential for the masterplan to evolve through time but it would still need to be in accordance with the SPD principles.</p> <p>Utility infrastructure will be assumed as a cost of the development.</p>	<p>No change.</p> <p>No change.</p>
013	Mark Furnish, Sport England	Whole document	<p>Providing sports facilities of right quality, type and location is key to encouraging physical activity. There are no objections to the SPDs provided acknowledgement that the increased demand will be met.</p> <p>SPDs should protect existing and plan for new facilities to comply with NPPF paragraph 73. Should set out within the SPDs that the developments should contribute towards meeting increased demand through on-site facilities or additional capacity off-site. Level of provision should be informed by evidence such as Sports Facility Strategy, Playing Pitch Strategy or other.</p> <p>Sport England and Public Health England's Active Design Guidance should be reflected in the SPDs: http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-</p>	<p>There are no existing sports facilities on the site. Local Plan policies, particularly BN.8 and Cl.1 ensure that needs for community infrastructure, play and recreation are met. The SPD already specifies that needs for open space and playspace will be met, additional reference can be made within the document in relation to broader sports requirements, which would need to be provided in accordance with the Local Plan policies.</p> <p>Sport England design guidance will be considered when determining proposals containing new sports and play equipment.</p>	<p>Amend the open space and playspace section to include reference to sports provision as follows:</p> <p><u>“Facilities for sport: opportunities to include formal sport/playing pitch provision should be considered (e.g. as part of the school) and should take account of Sport England Design Guidance.”</u></p>

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			andguidance/active-design/ The new sports facilities referenced in the Pudding Mill SPD should be fit for purpose and designed in accordance Sport England design guidance: http://www.sportengland.org/facilities-planning/tools-guidance/design-and-costguidance/		
014	Eduardo Giraldez	Page 37	Block G3 compromises the principal connection identified within the SPD. This should give access to canalside. It is shown on page 16 of the Public Realm Design manual as a more generous space. No continuity between route within north part of site and block F. Should propose green barrier of trees along western edge of site.	The principal connection is shown adjacent to block G3 so is not considered compromised. The image on page 16 of the Public Realm strategy shows a previous iteration of the masterplan. Noted. The Public Realm strategy currently includes a green barrier along much of the western edge of the site.	No change. No change. No change.
022	Claire McLean, Canal & River Trust	Page 7	Welcome objectives 1 and 4 in particular: 1-A centre of gravity around the canal and Three Mills; and 4-An active canal edge.	Noted.	No change.
		Page 15	The Trust is in discussions with the developers in relation to the proposed pedestrian and bus and cycle bridges, which require Trust consent.	Noted.	No change.
		Page 16	The layout ignores the Bow Free Wharf facility where access must be maintained and proposals take this essential wharf into account. The Trust uses this for waste removal but is also available for loading and unloading from waterspace so mustn't be threatened by development. Wharf activities can be noisy and release odours therefore residential development at this location would not be	The map shows a continuous walkway along the edge of the River Lea at this northern edge of the site. The Bow Free Wharf has therefore been included within this. This part of the site already has outline planning permission.	No change.

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			<p>appropriate, which was not considered properly within the previous outline permission.</p> <p>Policy 7.26 A of the London Plan supports use of Blue Ribbon network to transport freight, protection of facilities for freight traffic and transport of bulk materials during construction. Policy 7.27 also requires decisions to protect and improve access to Blue Ribbon Network, seeking new access and support for infrastructure such as moorings on the network. The Trust regularly requests conditions that assess potential for waterborne freight and maximise movement of waste and construction materials by barge.</p> <p>The Local Plan's Policy BN.2 and TN.10 also expect protection of disruption to waterway movement and support of movement by transport. Therefore protection of Bow Free Wharf should be clarified and enhanced within the SPD.</p>	<p>Noted.</p> <p>Noted. The role of Bow Free Wharf can be highlighted and included within the SPD.</p>	<p>No change.</p> <p>Amend the Riverside Walk section on page 18 to reference the Bow Free Wharf.</p>
		Page 18	Treatment of the school's riverside elevation will be important to ensure there is no barrier and incorporation of the riverside into the site is not hindered.	Noted.	No change.
		Page 18	Note requirement for a riverside walk and a set-back but may not be possible due to railway bridge. Should ensure no 'dead' space created just because of this blanket requirement. Any walkway must be usable and have positive impact on riverside for leisure use including potential for moorings or facilities. Note text regarding the alternative route on the eastern side of the Leaway, as towpath already exists all along the Lea until Bow Locks, and then down the Limehouse Cut canal.	There remains potential for a continuous route and any proposals to facilitate this will need to consider the impact on the riverside.	No change.

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		Page 22	Footbridge on map by north part of site and Strand East has not been agreed by the Trust.	Canal and River Trust will be consulted on all proposals for new bridges across the waterways.	No change.
		Page 23	Transport objectives should include river transport for construction, waste and passengers, using the towpath side waterbus landing access point.	Local Plan Policy T.10 encourages the use of the waterways for transport. The Transport Objectives section can be amended to reflect this.	Amend Transport Objectives section to include reference to the use of the waterways for transport within Policy T.10.
		Page 25	Footbridge is not agreed with Trust.	Canal and River Trust will be consulted on all proposals for new bridges across the waterways.	No change.
		Page 32	Support lower building heights adjacent to the river.	Noted.	No change.
		Page 35	Trust does not support the vehicular route along edge of waterside open space as it will segregate people from the waterside amenity space. A vehicular road prevents spill out and activity from any adjacent commercial units.	It is noted that CRT do not support the route.	No change.
		Page 43	The aim of active ground floor frontages maximised onto canal side is hindered by servicing vehicular access between the development and riverside which should be reoriented to the rear of the development, away from the river.	It is not considered that an access route will hinder the ability to create an active frontage from zone A.	No change.
		Page 50	Support active uses spilling onto the riverside at Zone G subject to there being no conflict with existing towpath users.	Noted.	No change.
		Page 54	Should also include that development within 8m of the river wall should also consult Canal & River Trust. Query whether setbacks are the most appropriate method of ensuring access for maintenance. Regarding SuDs, should consider previous uses and potential contamination of ground water which	The section can be amended to reference need for consultation with CRT. It will also be amended to clarify that the setbacks are not only a requirement for access and maintenance. Agree that additional text in respect of potential contamination	Amend Water Impact section to include reference to consultation with CRT within the Environment Agency 16m consultation zone: "The Canal and River Trust should also be

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			may enter river so outfalls may need to be stopped up and new outfall consent obtained from Canal & River Trust.	of ground and surface waters.	<p><u>consulted on proposals for development within this zone.</u></p> <p>Add the following text to expand on guidance for SuDS;</p> <p><u>“SuDS design measure should also take account of any potential or identified risk to watercourses and groundwater as a result of ground or ground water contamination.”</u></p>
		Page 55	Should include consideration of overshadowing on amenity spaces and River Lea and potential wind impacts on navigation of boats on the river from tall buildings	<p>The sunlight, daylight and overshadowing references the impacts on amenity spaces and the River Lea.</p> <p>Proposals within the area will be required to conduct a wind assessment as part of their planning application.</p>	<p>No change.</p> <p>No change.</p>
		Page 60	If a new application comes forward for the northern part of the site will reiterate our comments about the essential facility of Bow Free Wharf.	Noted.	No change.
		Page 62	<p>The Trust is happy to discuss a management company ‘adopting’ at stretch of towpath, as they are likely to be able to have resources to manage this to a better standard than the Trust as has been agreed in other parts of our network.</p> <p>There is potential for use of the waterways for</p>	<p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>

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			<p>heating and cooling to support the district heat network.</p> <p>Should include moorings within the SPD as waterspaces provide opportunities to provide long term, or short stay visitor moorings activity and animation to the waterspace. The area is lacking appropriate waterside facilities for boats including water, power, and refuse facilities.</p> <p>Lighting close to the waterspace must not spill over it as this could disrupt their bat habitats, and fittings should be 'bat friendly'.</p> <p>Document should contain reference to the Olympic Legacy Waterways Strategy, given that the area connects with the waterways in the strategy, and should have similar aims for the waterspace.</p>	<p>Although the Local Plan does not identify any new moorings in this particular location, the provision of new moorings would be encouraged by Policy BN.2.</p> <p>Applications will be expected to consider habitat impacts when designing lighting schemes.</p>	<p>No change.</p> <p>No change.</p>
			<p>Should also refer to the Town and Country Planning Association's Policy Advice note: Inland Waterways (2009) in particular, see Appendix 1 – 'Water proofing of planning policy': https://www.thenbs.com/PublicationIndex/documents/details?Pub=TCPA&DocID=294166</p>	<p>Noted.</p>	<p>No change.</p>
023	Iain Sim, House Mill Trust		<p>In principle the Trust welcomes the SPD Masterplan and Public Realm Strategy and comprehensive approach. The historic and heritage value of the Listed Buildings in the Three Mills Conservation Area is recognised. New development should protect and enhance this.</p> <p>The SPD boundary could be strengthened by extending to include the Conservation Area rather than leaving it adjacent as an 'Area of Influence'. The focus of the new District Centre is composed by four key areas linked by canal crossings</p>	<p>Support welcomed.</p> <p>The SPD boundary is following that of the site allocation. The SPD considers the historic context.</p>	<p>No change.</p> <p>No change.</p>

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			<p>including a cluster of public uses and open spaces around the Southern Strand East, buildings and spaces within Three Mills complex, reinstated Three Mills Lane and its connection to the canal edge, anchored by the relocated food store and the new school and large open space at Three Mills Green. A large part of this centre of gravity is outside the SPD boundary, documents within the Public Realm Strategy confirm this is illogical e.g. pages 27,35,51,65. The SPD and documents often refer to 'Three Mills' which is not helpful in creating certainty of the future of locality.</p> <p>The Trust recognised that the House Mill/Miller's House would benefit from clearer better designed and consistent signage that raises profile and legibility to the cluster of heritage buildings, acknowledgement of this in the documents would be supported.</p> <p>A meeting with officers would have been useful prior to publication of the SPD would have been helpful to gain an understanding of the objectives for House Mill and Miller's House. The Trust is responsible for the Grade I Listed Building of national significance, the largest surviving Tide Mill in the world. Should have included paragraph numbering.</p>	<p>Additional wording is to be included within the SPD to cover signage. Coupled with other design considerations this will include consideration of the heritage context of the wider area.</p>	<p>Additional text included at Chapter 11, page 51 of the final version of the SPD within the Public Realm, landscape and streetscape section as follows:</p> <p><u>"Contribute to defining public routes and spaces, including contribute to improving the permeability of the site and wider area, where possible, including through appropriately designed signage."</u></p>
		Page 5,	Should extend boundary to include Three Mills	The SPD boundary has been set	No change.

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		Boundary Plan	Conservation Area to emphasise that development should respect the setting and listed buildings.	by the site allocation, however map on page 15 considers the wider context of the site including the House Mill.	
		Page 7	Support policy objectives as they highlight importance of history and heritage assets and the value of the active waterside frontage, permeability and a new District Centre.	Support welcomed.	No change.
		Page 8	Supports this section but could be strengthened by including the Three Mills Conservation area within its boundary to reference Policy 4.1.	As above the SPD boundary follows that of the site allocation but the document recognises the heritage context of the site.	No change.
		Page 11	SPD should be extended to include Three Mills Conservation Area, Three Mills Studios site and the southern part of the Strand East development.	Please see above.	No change.
		Page 14	House Mill and Millers House are in separate ownership to Three Mills Studios.	Noted.	No change.
		Page 16	House Mill and Miller's House are already destinations for community uses.	Noted.	No change.
		Page 17	Support for this section including reduction of impact of car by parking and access control. However parking and servicing is crucial for House Mill and Miller's House, including up to 12 spaces in Tesco car park secured by S106 agreement, and this should be allowed for in new District Centre. It is unreasonable to expect Miller's House to carry out its objectives without some parking provision.	Comment noted. A reference to the need to consider such existing obligations and agreements will be made.	Add following text to SPD Section 14, Delivery of Infrastructure: <u>“Existing obligations and agreements</u> <u>Where existing obligations or agreements are tied to existing development within the SPD area are in place, consideration</u>

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					<u>may need to be given to these. For example, the car parking spaces secured through S106 agreement for use in conjunction with the Millers House within the existing Tesco Car Park.”</u>
		Page 21	Southern pedestrian subway has high level of use given proximity to Bromley-by-Bow station, and hard to see how improvements to safety and use can be made. Has consideration been given to surface level Toucan crossing similar to proposed to replace northern subway which would be safer. If set to same traffic phasing as proposed crossing to the north there would be minimum disruption to traffic.	Transport for London has considered a number of crossing options in developing the proposals in this location.	No change.
		Page 25	Pedestrian and cycle access through the Three Mills Studios along the edge of the Channelsea River would improve permeability and public access to water frontage.	Noted.	No change.
		Page 26	Support recognition of need to protect House Mill and Miller’s House, meaning S106 contributions from developers. Trust requests involvement at an early stage. Should have reference to Grade II Listed Custom House as this is important element of the grouping of Mill-related buildings.	The text within the SPD refers to protecting and fully considering the conservation area in development proposals. However the Trust will be included within any relevant discussions.	No change.
		Page 31	The House Mill is five storeys and the Miller’s House four storeys. Guidance is supported but should have further thought to design and material	The SPD identifies that proposals within the area should not harm the Conservation Area in	No change.

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			<p>guidance and impact on conservation and heritage objectives.</p> <p>Design, height and massing for the school are unclear and should be emphasised within the SPD to ensure not detrimental to Conservation Area.</p> <p>Support for primary school and potential for interaction with the heritage assets for educational purposes. Trust is looking to expand its well-developed educational programme.</p>	<p>particular for tall buildings.</p> <p>As above, proposals will need to fully consider the potential impacts on the Conservation Area.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>
		Page 36	<p>Objection to building heights in view of potential impact on House Mill, Miller's House and other historic buildings, and are not consistent with policy advice on p 31 and the heights map on p32 in relation to not affecting historic setting and being lower in scale by canal.</p> <p>Although it is not a Listed Building the façade of the Miller's House is a replica of the original so should be included in the schedule of buildings.</p>	<p>The impacts upon the Conservation have been a key consideration in relation to the guidance within the SPD on heights. It is considered that the heights map is consistent to the guidance elsewhere within the SPD.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>
		Page 43	<p>There is a partial view across to Three Mills from the Bromley by Bow station exit and it is not clear if will remain or, preferably, be improved upon in some way. This should be clarified.</p>	<p>As identified at pages 27-30 of the SPD a number of views have been identified and verified by historic England. This view mentioned has not been verified.</p>	<p>No change.</p>
025	Bromley-by-Bow Landowners	Whole document	<p>Comments prepared on behalf of the key private owners namely: British Land, Danescroft, Lindhill, Southern Housing and Vastint.</p>	<p>Noted.</p>	<p>No change.</p>
			<p>SPD states it has been prepared as guidance on implementation of Local Plan and to assist landowners achieve comprehensive development. It</p>	<p>Noted.</p>	<p>No change.</p>

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			<p>focuses on Site Allocation 4.1 area in six ownerships: British Land, Danescroft, Lindhill, LLDC, Southern Housing and Vastint. It enhances a vision for this undeveloped land and deliver of associated infrastructure.</p> <p>Landowners are supportive of the ambitions of SPD and confirm intention to continue to work on aims and aspirations of SPD. The land is highly constrained and ability to unlock potential for comprehensive regeneration will require substantial investment by each landowner, at time of uncertainty in emerging market. Nature of the constraints means that delivery will take some time to realise. These factors point to a need for a flexible, adaptable policy framework.</p> <p>Progress to date has been significant with landowners working on a joint masterplan which demonstrates how the SPD guidance might be interpreted and comprehensive development achieved. Illustrative masterplan is underpinned by:</p> <ul style="list-style-type: none"> • Appropriate environmental testing of layout, massing and land use distribution • Identification of potential mitigation measures and further environmental testing as proposals move to more detailed design stages • Viability testing of development and infrastructure and affordable housing capabilities • Consultation with EA and Historic England • Scrutiny and input from QRP, Planning Committee and Board 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			Illustrative masterplan has helped inform SPD parameters and guidance, but is illustrative to demonstrate how comprehensive development might be achieved. SPD and illustrative masterplan provide overarching framework within which landowners can bring forward individual applications and provide basis for how these are developed.		
		Page 7	Text states that the SPD's purpose is to provide guidance on Local Plan policies applied to the site and also states that it provides guidance on land use consideration, transport needs, connectivity requirements, conservation and heritage, key views and broad guidance on height, scale and massing. This purpose is supported by the landowners. SPD also sets out parameter plans and design codes which have derived from illustrative masterplan which define footprint of development blocks, access, movement and route hierarchy, building heights, land use distribution, minimum dimensions and open space quantum and distribution.	Noted.	No change.
		Page 33	<p>SPD states that proposals should accord with the parameter plans and this adherence is repeated in the site wide design code. Concern about potential ambiguity exists in the SPD between guidance and the prescriptive masterplan parameters and design codes.</p> <p>It is inevitable that issues will be raised which will lead to amendments in parameters and design codes set by the SPD. For example more detailed testing of the school site location suggests it would be better located as a standalone building on zone G1 and G2 rather than E2. If appears officers share this emerging view and the benefits in relation to</p>	<p>Page 33 of the SPD explains the relationship between the SPD and the illustrative masterplan. Some further detail will be added to this page and page 4 and 7 in relation to this matter. This should ensure that there is no ambiguity.</p> <p>As above, the new wording to the SPD will ensure clarity in relation to the masterplan approach and how any variation will need to be dealt with. This should ensure that it does not compromise the aims of the site allocation as a whole.</p>	<p>Amend sections on pages 4, 7 and 33 relation to the masterplan approach (See Annex 1 for detailed wording).</p> <p>As above, wording to be amended on pages 4, 7 and 33.</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>construction, timing and operation. If proposals are expected to be in accordance with the parameter plans then this would prevent such relocation being explored and developed, and the enhancement lost. SPD should be amended to increase flexibility and acknowledge that deviations from parameters and design codes may be permitted if subject to robust environmental testing and retain compliance with Development Plan.</p> <p>Should acknowledge that illustrative masterplan is underpinned by viability assessment, critically appraised by LLDC advisors. This recognises that 35% affordable housing may not be feasible due to infrastructure requirements. Site specific applications will be accompanied by viability assessments which will adopt viability principles underpinning the Masterplan. This accords with the Mayor's Draft Affordable Housing and Viability SPG which requires a threshold approach to viability whereby schemes not achieving 35% affordable housing without public subsidy should be subject to viability assessment.</p>	<p>It is acknowledged that the illustrative masterplan has been underpinned by viability assessment, however site specific assessments would also be required when individual applications are submitted.</p>	<p>No change.</p>
		Page 4	<p>It also includes an illustrative masterplan that demonstrates how comprehensive development of the southern part of Bromley by Bow can be achieved. <u>the guidance contained in this SPD might be interpreted and how comprehensive redevelopment of the site achieved.</u></p>	<p>As above the wording on page 4 is to be amended in relation to the role of the illustrative masterplan.</p>	<p>Amend page 4 in relation to the role of the illustrative masterplan.</p>
		Page 7	<p>The SPD provides guidance on how relevant policies in the Local Plan will be applied to the site and the principles for how best development of the site can might be taken forward.</p>	<p>As above the wording on page 7 will be amended for clarity in relation to the role of the Local Plan policies.</p>	<p>Amend page 7 in relation to the role of the Local Plan policies.</p>
		Page 7	<p>Environmental design principles that an masterplan individual site specific proposal brought forward on</p>	<p>The text on page 4 is to be amended to relate to specific site</p>	<p>Amend page 4 in relation to requirements of site-</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			the site would need to address.	applications.	specific applications.
		Page 7	the SPD can could be applied and achieve an acceptable development solution.	The wording on page 4 is to be amended and this sentence removed.	Remove this sentence.
		Page 19	<u>In the context of the viability work that underpins the illustrative masterplan and in the context of future site-specific redevelopment proposals this target should be used as a minimum and will be used as a basis to commence discussion on individual schemes.</u>	Site specific applications will be expected to include viability testing, therefore it is not appropriate to amend this wording as suggested.	No change.
		Page 33	...form a framework against which individual applications are will be brought forward and assessed.	It is not considered necessary to amend this text as suggested.	No change.
		Page 33	This will help ensure that a comprehensive approach to development of the Bromley-by-Bow south area can be demonstrated. Redevelopment proposals will be expected to be in accordance with the parameter plans. <u>Where proposals depart from the parameter plans developers promoting such departures must provide a rationale for such departures and must demonstrate that they accord with the wider policies of the Development Plan and that any environmental impacts can be appropriately managed.</u>	As above it is proposed that the text be amended to provide further clarity on the role of the illustrative masterplan parameter plans and the circumstances where a variation to this approach are proposed.	Amend text in relation to the circumstances where a variation to the parameter plans is proposed.
		Page 39	Should clarify how this area has been measured and include in the key.	The map on page 39 is to be amended and updated.	Amend and update open space map.
		Page 42	Should include wording: <u>Where proposals depart from the parameter plans developers promoting such departures must provide a rationale for such departures and must demonstrate that they accord with the wider policies of the Development Plan and that any environmental impacts can be appropriately managed</u>	As above there is to be new wording inserted into page 33 relating to where an approach differs to that of the parameter plans. It is not considered necessary to also include this within this section.	No change.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
026	Tim Neale, Transport for London	Whole document	Views relate to planning officers and do not relate to Mayoral decisions. May not be GLA view and a separate response submitted on behalf of TfL as a landowner.	Noted.	No change.
		Whole document	TfL offer further advice on any responses received concerning transport and connectivity. Mapping work should show that it is largely indicative not always showing all potential vehicular movements. Masterplan parameter plans can be inconsistent with the other plans in the SPD. Text may need to be updated to reflect ongoing discussions about funding and delivery between LLDC and TfL for the highway proposals.	Noted. The mapping will be reviewed to ensure consistencies.	Mapping to be amended where necessary. Map amendments identified: <ul style="list-style-type: none"> • Page 16- open space, junction, routes. • Page 22- add routes on connecting. • combine maps on page 22 and 25. • Page 61- Open space, routes, junction
		Page 15	Northern “pedestrian bridge” should be shown as “pedestrian / cycle bridge”.	Map will be amended to reference the pedestrian/cycle bridge.	Amend map on page 15 to label as pedestrian/ cycle bridge.
		Page 16	Amend secondary route links through to Franklin Street.	Map will be amended to show a consistent link with Franklin Street	Amend key route within map.
		Page 21	Should amend text: A new all movement junction from the A118 into the Sugar House Lane site ... This junction <u>in future with minor changes</u> , would also enable connections into Pudding Mill Lane via a proposed bridge over the Bow Back River	Text to be amended to reflect comments.	Amend text as suggested.
		Page 21	Should amend description of the new junctions as two junctions or separate description of north and south junctions. Should amend text as: In order for development of the southern part of the site allocation for residential development led mixed	Text to be amended to reflect comments.	Amend text as suggested with reference to one junction with northern and southern parts.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>use development to be acceptable...</p> <p>Should form new paragraph starting with existing text "It is anticipated.."</p> <p>Amend text as:</p> <p><u>There will need to be better direct access to the southern subway from the east</u> The southern subway will be enhanced by providing better access to its eastern approach as part of redevelopment of the adjacent site. Discussion will need to take place between TfL and the adjacent landowners to agree how these improvements are best designed and implemented as some works may need to be carried out on TfL land or third party land. New crossings will <u>need to</u> be provided as part of the new junction in between the existing subways.</p>		
		Page 23	<p>These crossings would need to form part of new junctions which provide for better bus and private car <u>vehicular and servicing</u> access to the site</p>	Text to be amended to reflect comments.	Amend text as suggested.
		Page 23/Page 25	<p>Cycling objectives are not part of the Bow Vision as is a lack of width and funding. Could show on Transport Objectives map. Work on TfL assets will be required to address cycling requirements.</p> <p>Amend text as: The new junction and any improvement <u>to the access</u> to the southern subway</p> <p>Amend bus objectives as: which a bus routes can operate in <u>both directions at all times</u></p> <p>Amend Bromley-by-Bow as: ... better improved road access will be required into the site to ensure adequate accessibility for servicing <u>and buses and</u></p>	Text to be amended to reflect comments.	Amend text as suggested.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			private vehicles that need access.		
		Page 25	<p>Should amend the map to avoid conflicts with masterplan. Could include the masterplan layouts, or have a cross reference to the parameter plans. Should also be clear how links are shown beyond the SPD boundary (e.g. through Strand East or on Franklin Street) or at Bow Roundabout.</p> <p>Should amend map and key. Removing for “private cars and servicing” and split existing routes for improvement, and include a box by A12 southern junction for “enables bus only access across A12 junction”.</p> <p>Support cycle link along east side of A12 but should be extended southwards as a potential link.</p> <p>The primary route connection to Franklin Street should be a ‘green’ pedestrian / cycle connection.</p> <p>Include a west-east arrow at Bow Roundabout to show interim works.</p>	<p>As above the mapping will be reviewed to ensure consistency between SPD and illustrative masterplan.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the page 25 map as suggested.</p>	Amendments made to map as suggested and the map is now found on page 22 of the final SPD.
		Page 34	Parameter plans are not consistent with map on page 25	Mapping will be reviewed to ensure consistency.	No change.
		Page 35	Map is inconsistent with page 25 map as there is no on-street cycling either side of the A12, no connections between Three Mills Lane / St Leonards towards tube stop.	The mapping is consistent in relation to on-street cycling-both showing a route to the east of the A12 only. The map on page 35 only shows all the routes within the site boundary, page 25 is more comprehensive.	No change.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			The transition of the cycle access from on footway to on street at Three Mills Lane is unresolved and recommended to stay further on footway to a later transition point at Three Mills Lane.	This is what is referred to as a primary route with the map on page 25.	
		Page 40	Inconsistency with Page 25 map in relation to lack of footpath to the south of the site shown as a potential link and other potential routes shown within blocks.	Comment noted, however, the map on page 25 (now page 22 in the final SPD) does establish the principle of a potential link while the parameter plans continue to allow flexibility for delivery of this. Additional text is proposed in both chapters 7 and 12 to emphasise this.	See response to comment 006 in this table for detail of additional text in Chapters 7 and 12 of the SPD.
		Page 42	There are a number of potential constraints on the site situated close to railway infrastructure where there should be restrictions on opening windows or balconies. Oversailing of tall plant or use of air space will require prior approval from London Underground.	Noted.	No change.
		Page 43	New code should be included: <u>A6 Opening windows and balconies on railway facing facades must be designed in consultation with London Underground, and In the interests of railway infrastructure protection.</u>	Code A5 already deals with the interface with railway infrastructure therefore this will be amended to include references to open windows and balconies being designed in consultation with London Underground as requested rather than a new code inserted.	Amend design code A5 to insert: <u>Opening windows and balconies on railway facing facades must be designed in consultation with London Underground</u>
		Page 44	New code should be included: <u>B7 Opening windows and balconies on railway facing facades must be designed in consultation with London Underground, and In the interests of railway infrastructure protection</u>	Code B3 already deals with the interface with railway infrastructure therefore this will be amended to include references as requested rather than a new code inserted.	Amend design code B3 to insert: <u>Opening windows and balconies on railway facing facades must be designed in consultation</u>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
					with <u>London Underground</u>
		Page 52	Should be specific reference to Legible London such as included within the Pudding Mill SPD.	Details on Legible London signage can be included to be consistent with the Pudding Mill SPD.	Amend to include: including contribute to improving the permeability of the site and wider area, where possible, <u>including through appropriately designed signage.</u>
		Page 53	Should have stronger commitment for street trees as shown within the illustrative material.	Noted. Reference to a green edge to the western side of the site to be included.	Amend as: Retaining trees in critical locations, particularly a <u>green edge</u> along the A12 and river frontages.
		Page 56	Should consider a trigger/Grampian condition and the text should be updated to show who delivers the junction and how. It is likely TfL will carry out the works.	The text to Chapter 14 will be amended to include further information on delivery considerations.	Amend Chapter 14 in relation to the delivery of the junction and other infrastructure.
		Page 59	Section should be reviewed in light of discussions between LLDC and TfL relating to how a package of measures will be funded. Will need to agree how the junction are delivered by which legal mechanism and how external/third party funding is collected. Contributions will need to be pooled and at six plots this could be affected by pooling restrictions. Amend to: TfL may <u>will</u> need...	As above this section will be reviewed in relation to delivery of infrastructure. The text relating to the proposed change has been amended.	Amend Chapter 14 in relation to the delivery of the junction and other infrastructure.
		Public Realm Design Manual	Should clarify whether this is illustrative or proposed for adoption. Land within the TLRN boundary must be in line	The Design Manual is illustrative, in support of the Developers' Masterplan. This document has been produced by the Developers	Amend Section 11 to include further guidance on location of street trees and signage.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>with TfL Streetscape guidance (available at https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit)</p> <p>Should clarify if street trees along A12 are feasible given pavement widths and utility locations and who would fund and deliver these.</p> <p>Should clarify that designs and sections will accommodate swept paths for buses and the largest servicing vehicles.</p> <p>Green verges should be reviewed regarding desire lines, which will result in damaged greenery.</p> <p>Should be reference to Legible London alike Pudding Mill SPD.</p>	<p>and it is not in the Legacy Corporation's powers to amend it. However, the principles within the comments can be incorporated into the SPD itself, including incorporation of street trees and signage as included above.</p>	
		Landowner Masterplan	<p>It is assumed that the masterplan is illustrative and not for adoption. TfL pre-application discussions are strongly encouraged alongside arrangements for designing and delivering access points from the A12.</p> <p>Page 39- TfL expect Cycle Hire docking stations within the site, which would extend the network to the east of the A12 and complement the existing extensions through the LLDC area and Queen Elizabeth Olympic Park.</p> <p>Page 41 – Any amendments to the bus network would be subject to public consultation undertaken by TfL.</p> <p>Page 79 – Generally support the street sections but may be some inconsistencies or typos to clarify: Section 2 page 79 appears to be a typo (43.8m).</p>	<p>The Masterplan is illustrative. Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>As above, the consistency between the mapping will be addressed. Noted, comments to</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Amend mapping to remove inconsistencies between diagrams. See</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			P38 recommends 18.5, p80 suggests 17.5m.	be passed onto landowners.	above.
		General	Expect to keep working on proposals ensuring potential transport infrastructure projects and funding are aligned.	Noted.	No change.
027	John Lett, GLA	Whole document	All plan documents need to be in general conformity with the London Plan. GLA is content that SPDs promote growth and balance other policy considerations.	Noted.	No change
		Whole document	As SPDs propose release of industrial land LLDC needs to ensure the scale is in accordance with Local Plan and does not compromise retention of other industrial land within LLDC or boroughs.	Noted.	No change
		Whole document	Views relate to planning officers and do not relate to Mayoral decisions. May not be GLA view and a separate response submitted on behalf of TfL as a landowner.	Noted.	No change.
		Whole document	TfL offer further advice on any responses received concerning transport and connectivity. Mapping work should show that it is largely indicative not always showing all potential vehicular movements. Masterplan parameter plans can be inconsistent with the other plans in the SPD. Text may need to be updated to reflect ongoing discussions about funding and delivery between LLDC and TfL for the highway proposals.	Noted. The mapping will be reviewed to ensure consistencies.	Mapping to be amended where necessary. Map amendments identified: <ul style="list-style-type: none"> • Page 16- open space, junction, routes. • Page 22- add routes on connecting. • combine maps on page 22 and 25. • Page 61- Open space, routes, junction
		Page 15	Northern "pedestrian bridge" should be shown as "pedestrian / cycle bridge".	Map will be amended to reference the pedestrian/cycle bridge.	Amend map on page 15 to label as pedestrian/ cycle bridge.
		Page 16	Amend secondary route links through to Franklin Street.	Map will be amended to show a consistent link with Franklin Street	Amend key route within map.
		Page 21	Should amend text:	Text to be amended to reflect	Amend text as

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			A new all movement junction from the A118 into the Sugar House Lane site ... This junction <u>in future with minor changes</u> , would also enable connections into Pudding Mill Lane via a proposed bridge over the Bow Back River	comments.	suggested.
		Page 21	<p>Should amend description of the new junctions as two junctions or separate description of north and south junctions. Should amend text as:</p> <p>In order for development of the southern part of the site allocation for residential development led mixed use development to be acceptable...</p> <p>Should form new paragraph starting with existing text "It is anticipated.."</p> <p>Amend text as:</p> <p><u>There will need to be better direct access to the southern subway from the east</u> The southern subway will be enhanced by providing better access to its eastern approach as part of redevelopment of the adjacent site. Discussion will need to take place between TfL and the adjacent landowners to agree how these improvements are best designed and implemented as some works may need to be carried out on TfL land or third party land. New crossings will <u>need to</u> be provided as part of the new junction in between the existing subways.</p>	Text to be amended to reflect comments.	Amend text as suggested with reference to one junction with northern and southern parts.
		Page 23	These crossings would need to form part of new junctions which provide for better bus and private car <u>vehicular and servicing</u> access to the site	Text to be amended to reflect comments.	Amend text as suggested.
		Page	Cycling objectives are not part of the Bow Vision as	Text to be amended to reflect	Amend text as

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
		23/Page 25	<p>is a lack of width and funding. Could show on Transport Objectives map. Work on TfL assets will be required to address cycling requirements.</p> <p>Amend text as: The new junction and any improvement <u>to the access</u> to the southern subway</p> <p>Amend bus objectives as: which a bus routes can operate in <u>both directions at all times</u></p> <p>Amend Bromley-by-Bow as: ...better <u>improved</u> road access will be required into the site to ensure adequate accessibility for servicing <u>and</u> buses and private vehicles that need access.</p>	comments.	suggested.
		Page 25	<p>Should amend the map to avoid conflicts with masterplan. Could include the masterplan layouts, or have a cross reference to the parameter plans. Should also be clear how links are shown beyond the SPD boundary (e.g. through Strand East or on Franklin Street) or at Bow Roundabout.</p> <p>Should amend map and key. Removing for “private cars and servicing” and split existing routes for improvement, and include a box by A12 southern junction for “enables bus only access across A12 junction”.</p> <p>Support cycle link along east side of A12 but should be extended southwards as a potential link.</p> <p>The primary route connection to Franklin Street should be a ‘green’ pedestrian / cycle connection.</p> <p>Include a west-east arrow at Bow Roundabout to</p>	<p>As above the mapping will be reviewed to ensure consistency between SPD and illustrative masterplan.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the page 25 map as suggested.</p> <p>Amendments can be made to the</p>	Mapping amended as suggested (Map found at page 22 of final SPD).

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			show interim works.	page 25 map as suggested.	
		Page 34	Parameter plans are not consistent with map on page 25	Mapping will be reviewed to ensure consistency.	No change.
		Page 35	Map is inconsistent with page 25 map as there is no on-street cycling either side of the A12, no connections between Three Mills Lane / St Leonards towards tube stop. The transition of the cycle access from on footway to on street at Three Mills Lane is unresolved and recommended to stay further on footway to a later transition point at Three Mills Lane.	The mapping is consistent in relation to on-street cycling-both showing a route to the east of the A12 only. The map on page 35 only shows all the routes within the site boundary, page 25 is more comprehensive. This is what is referred to as a primary route with the map on page 25.	No change.
		Page 40	Inconsistency with Page 25 map in relation to lack of footpath to the south of the site shown as a potential link and other potential routes shown within blocks.	Comment noted, however, the map on page 25 (now page 22 in the final SPD) does establish the principle of a potential link while the parameter plans continue to allow flexibility for delivery of this.	No change
		Page 42	There are a number of potential constraints on the site situated close to railway infrastructure where there should be restrictions on opening windows or balconies. Oversailing of tall plant or use of air space will require prior approval from London Underground.	Noted.	No change.
		Page 43	New code should be included: <u>A6 Opening windows and balconies on railway facing facades must be designed in consultation with London Underground, and In the interests of railway infrastructure protection.</u>	Code A5 already deals with the interface with railway infrastructure therefore this will be amended to include references to open windows and balconies being designed in consultation with London Underground as	Amend design code A5 to insert: <u>Opening windows and balconies on railway facing facades must be designed in consultation</u>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
				requested rather than a new code inserted.	<u>with London Underground</u>
		Page 44	New code should be included: <u>B7 Opening windows and balconies on railway facing facades must be designed in consultation with London Underground, and In the interests of railway infrastructure protection</u>	Code B3 already deals with the interface with railway infrastructure therefore this will be amended to include references as requested rather than a new code inserted.	Amend design code B3 to insert: <u>Opening windows and balconies on railway facing facades must be designed in consultation with London Underground</u>
		Page 52	Should be specific reference to Legible London such as included within the Pudding Mill SPD.	Details on Legible London signage can be included to be consistent with the Pudding Mill SPD.	Amend to include: including contribute to improving the permeability of the site and wider area, where possible, <u>including through appropriately designed signage.</u>
		Page 53	Should have stronger commitment for street trees as shown within the illustrative material.	Noted. Reference to a green edge to the western side of the site to be included.	Amend as: Retaining trees in critical locations, particularly <u>a green edge</u> along the A12 and river frontages.
		Page 56	Should consider a trigger/Grampian condition and the text should be updated to show who delivers the junction and how. It is likely TfL will carry out the works.	The text to Chapter 14 will be amended to include further information on delivery considerations.	Amend Chapter 14 in relation to the delivery of the junction and other infrastructure. (Amendments to the text for this section are indicated within Annex 1 to this consultation summary)

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
		Page 59	<p>Section should be reviewed in light of discussions between LLDC and TfL relating to how a package of measures will be funded. Will need to agree how the junction are delivered by which legal mechanism and how external/third party funding is collected. Contributions will need to be pooled and at six plots this could be affected by pooling restrictions.</p> <p>Amend to: TfL may <u>will</u> need...</p>	As above this section will be reviewed in relation to delivery of infrastructure. The text relating to the proposed change has been amended.	Amend Chapter 14 in relation to the delivery of the junction and other infrastructure. (Amendments to the text for this section are indicated within Annex 1 to this consultation summary)
		Public Realm Design Manual	<p>Should clarify whether this is illustrative or proposed for adoption.</p> <p>Land within the TLRN boundary must be in line with TfL Streetscape guidance (available at https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit)</p> <p>Should clarify if street trees along A12 are feasible given pavement widths and utility locations and who would fund and deliver these.</p> <p>Should clarify that designs and sections will accommodate swept paths for buses and the largest servicing vehicles.</p> <p>Green verges should be reviewed regarding desire lines, which will result in damaged greenery.</p> <p>Should be reference to Legible London alike Pudding Mill SPD.</p>	The Design Manual is illustrative, in support of the Developers' Masterplan. This document has been produced by the Developers and it is not in the Legacy Corporation's powers to amend it. However, the principles within the comments can be incorporated into the SPD itself, including incorporation of street trees and signage as included above.	Amend Section 11 to include further guidance on location of street trees and signage.
		Landowner Masterplan	It is assumed that the masterplan is illustrative and not for adoption. TfL pre-application discussions are strongly encouraged alongside arrangements for designing and delivering access points from the	The Masterplan is illustrative. Noted.	No change.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>A12.</p> <p>Page 39- TfL expect Cycle Hire docking stations within the site, which would extend the network to the east of the A12 and complement the existing extensions through the LLDC area and Queen Elizabeth Olympic Park.</p> <p>Page 41 – Any amendments to the bus network would be subject to public consultation undertaken by TfL.</p> <p>Page 79 – Generally support the street sections but may be some inconsistencies or typos to clarify: Section 2 page 79 appears to be a typo (43.8m). P38 recommends 18.5, p80 suggests 17.5m.</p>	<p>Noted.</p> <p>Noted.</p> <p>As above, the consistency between the mapping will be addressed. Noted, comments to be passed onto landowners.</p>	<p>No change.</p> <p>No change.</p> <p>Amend mapping to remove inconsistencies between diagrams. See above.</p>
		General	Expect to keep working on proposals ensuring potential transport infrastructure projects and funding are aligned.	Noted.	No change.
031	Terunesh McKoy, LB Tower Hamlets	Whole document	<p>LBTH officers are keen to cooperate with LLDC and stakeholders to ensure that the site integrates with adjoining communities.</p> <p>The SPD is welcomed and principles guiding development of new homes, jobs and a district centre are supported. Should ensure that development is of a high quality and provides necessary infrastructure, such as transport connections, schools, community facilities and open space.</p>	Noted.	No change.
		Whole document	Reduction of retail vehicle parking and underground location welcomed. Choice of access/egress points will impact local highways and potentially the A12 so SPD should consider the most appropriate parking locations. Supermarket deliveries on site	The Public Realm team at Tower Hamlets will be consulted upon applications within the area in relation to parking and loading requirements.	No change.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>are welcomed and should engage with Public Realm team to agree the most appropriate on street parking and loading facilities.</p> <p>Very low residential parking is welcomed. Parking standards should be referenced within the document. LBTH resists policy of relying on local highways to provide blue badge parking which should be located within development plots.</p> <p>Highway Authority is party to the design of the A12 junction and is examining improvement to LBTH roads to the west of the A12 where provision of additional bus services are intended. CIL should take account of the cost of delivering all elements of this essential piece of infrastructure. The junction should be in place prior to operation of the supermarket, the school and initial phases of residential development.</p> <p>The SPD should identify highways to be stopped up/diverted and new roads to be adopted or designed to adoptable standards. Should engage with Highway Authority to be designed to standards which may influence site layout and design codes. The Highway Authority will need to agree s38 agreements on new highways for adoption as well as commuted maintenance payments for any newly created highway within the SPD area.</p>	<p>Support welcomed. LBTH's policy on location of blue badge parking noted.</p> <p>The SPD sets out how essential items of infrastructure such as the junction are to be funded. Section 14 has been amended to provide further clarity in this respect.</p> <p>The Highways Authority will be consulted upon applications within the area in relation to road layouts and S38 agreements.</p>	<p>No change.</p> <p>No change.</p>
		Whole document	<p>Wording for proposed community use is flexible and welcomed amid uncertain budget position of libraries and Ideas Stores. However Ideas Stores should be directed to town centres rather than on edge or co-located with schools.</p>	<p>Support for flexible wording welcomed. It is noted that Ideas Stores are directed towards town centres. All the potential locations for community uses within the illustrative masterplan are within the area to become the District</p>	<p>No change.</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>The reference to 200sqm on the ground floor with the remainder above recognises that town centre space is at a premium. This option therefore provides the retail frontage whilst minimising impact on other ground floor retail uses. Should engage the Council as early as possible about the potential end user. The SPD states an Ideas Store of 1200sqm, however the infrastructure project list identifies 1315sqm.</p>	<p>Centre.</p> <p>The SPD sets out that the precise floorspace of the community use would be determined at the planning application stage. The reference to 1,200sqm refers to the previously permitted scheme.</p>	<p>No change.</p>
		Whole document	<p>Provision of 2FE school aligns with the infrastructure requirements for the site. The location is acceptable, noting that it is situated away from the main road. Need flexibility about timing of school to ensure needs of residential community are met, but new road crossings need to be in place before school opens. Benefit of temporary school needs further consideration.</p>	<p>There is flexibility in the wording in relation to the delivery of the school to ensure that the needs are met within the area as they are generated. One of these options includes provision of a temporary school.</p>	<p>No change.</p>
		Whole document	<p>Borough has open space deficiency and the site could help address this through provision of 1ha of active recreation. Proposed layout is unacceptable due to fragmented and linear format which fails to be active recreation.</p> <p>The Council's Open Space Strategy identified that Bromley-by -Bow is outside the 400m catchment area for access to a park of 2ha and above. It also acknowledges that spaces of 1 ha+ can meet some of these needs provided they are designed for active recreation. Although new residents will have access to open space at Three Mills Green this will not reach areas to the west of the A12 which will benefit from improved provision should a large park be provided within the site. Therefore LBTH object to layout of open space and encourage discussion</p>	<p>It is anticipated that the open space provision within the site will provide for the needs within a variety of functions. The SPD wording will be amended to clarify the role of the open space across the whole of the site, including ensuring it provides a variety of functions. An additional map will also be inserted to provide the open space strategy in relation to the locations for active and equipped play which will meet the demands of the development and the wider area. A meeting has taken place to discuss this issue and agreement reached.</p>	<p>Amend the SPD to include a new open space section and insert map showing open space strategy. See Annex 1 to this consultation summary.</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			so these issues can be resolved.		
		Whole document	The funding for the school is set out within a calculation but there are no similar calculations for community facilities and open space. SPD should give direction on long term future of the infrastructure required on site, certainty of timely delivery, ownership and how infrastructure will be maintained to not place pressure on existing services.	The funding for a school has been included to ensure the flexibility in relation to the provision of a school. The particular circumstances may require funding to be sought from developers, whereas community facilities and open space are expected to be provided on site.	No change.
		Whole document	Maps should have clear numbering and a title. Should make distinction between design parameter and an illustrative scheme.	Maps will be numbered and titled.	Add map numbers and titles.
		Page 15	No mention of the constraints the sewer network places on the plot, such as on plot configuration and massing.	The constraints of the sewer network will be added to the diagram.	Amend map to include box showing that sewers may place constraints on development.
		Page 34	Plans show developable areas and other spaces show routes. Proposed open space should be illustrated clearly and separated from access routes where appropriate. Plots D, E and F are considerably larger than what has been built in recent years. Retention of supermarket rationale for one, but others raise legibility concerns. Podium approach makes more problematic in defining street frontage.	The open space is shown within the map on page 39. The map on page 35 shows potential for routes through these larger blocks.	No change. No change.
		Page 35	East-west cycle connections are shown through blocks D, E and F. These blocks need to be broken down to facilitate better movement and opportunities for public realm realised. These routes should become a requirement, rather than potential. Podium blocks with cycle access raise concerns about legibility of the routes and use.	Some further detail can be added to the connectivity section in relation to the potential for east-west routes across site.	The following text will be added to the Transport objectives section on page 23 of the consultation draft SPD: "Pedestrian and cycling connections should also

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
					be integrated as part of east-west routes through larger development blocks.”
		Page 36	<p>Building heights plan rationale has not been clearly set out. Storey heights very prescriptive and concerns about environmental impacts of massing and quality of space proposed.</p> <p>Although principles set out buildings over 6 storeys subject to BN.10, it is in conflict with the prescriptive approach of building heights plan and footprints of buildings. The ‘max height’ plan shows buildings up to 26 storeys. The SPD is not correct place to indicate this in absence of environmental assessment to establish the impacts. This should be at application stage where BN.10 can also be applied alongside material planning considerations. Should remove specific building heights from parameter plan with caveat that above 6 storeys should meet BN.10.</p> <p>Concerns regarding open space quality and usability impacted by building heights. E.g. urban plaza to west by blocks B, C and D is overlooked by 26 storeys, 15 and 12 & 15 respectively. These raise sunlight/daylight, wind issues that could compromise use of space, and parameter plan of D6 does not address this concern.</p> <p>Block C fronts main traffic route with little set back, raises concerns about residential quality. There is not a sufficient buffer or easement between Block A</p>	<p>Environmental testing took place alongside the development of the Masterplan which are made available. Analysis has also been provided against the criteria for BN.10.</p> <p>There is a note to the diagram on page 36 confirming that buildings over 6 storeys are subject to BN.10. Proposals over the height threshold of 18 metres will be tested against BN.10 at the application stage.</p> <p>The environmental testing included daylight and sunlight and wind analysis. There are a number of codes dealing with these issues at this location (i.e. D5- D6, B8-12; C8-C11). Further testing will be expected to take place at the application stage.</p> <p>Some amendments will be made to the treatment of the railway line within the design codes to take</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Amend the design codes to insert the wording: <u>Opening windows and</u></p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>& B and railway line. Podium blocks have very small setbacks, others none, raising residential quality concerns. Masterplan should address all these issues through triple mitigation measures such as triple glazing or high level windows, suitable setbacks and other measures.</p>	<p>account of comments made by TfL. Design codes C4 & C5, already address these issues. The detailed designs will be expected to address these issues further.</p>	<p><u>balconies on railway facing facades must be designed in consultation with London Underground</u></p>
		Page 38	<p>Minimum Dimensions Plan should identify open space and clear information for setbacks to establish quantum of open space and design parameters for blocks with relationship to open space. This will establish nature and character of open space across site, e.g. urban plaza being distinct from waterside open space and how distinction enabled by design parameters and relationship to urban blocks, not just building heights.</p> <p>Plots A and B should clearly identify setbacks, particularly on upper levels from railway line to ensure communal amenity space is not compromised. These will further identify specific design parameters crucial for blocks A & B due to proximity to railway line.</p>	<p>As above further detail is to be inserted into the SPD in relation to the open space. This will provide clarity on character and function of these spaces.</p> <p>As above the design codes for blocks A and B are to be amended to ensure the railway infrastructure is suitably protected. The diagram does include a setback of 2m from the railway.</p>	<p>Amend the SPD to include further detail in relation to open space and insert map showing open space strategy.</p> <p>Amend the design codes to ensure the railway-fronting blocks are designed to protect infrastructure.</p>
		Page 39	<p>Open Space Plan should identify quantum, nature and boundary of open space proposed. Currently only minimum open space proposed. Blocks should be clearly defined and rationale for minimum dimensions explained to manage development parcel around open space. Should have clear logic to location of open space and how they contribute to district centre. Spaces appear sporadic and require clarification in design codes and parameter plans.</p>	<p>The SPD wording will be amended to clarify the role of the open space across the whole of the site, including ensuring it provides a variety of functions. An additional map will also be inserted to provide the open space strategy in relation to the locations for active and equipped play which will meet the demands of the development and the wider area. A meeting has taken place</p>	<p>Amend the SPD to include further detail in relation to open space and insert map showing open space strategy.</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
				to discuss this issue and agreement reached.	
		Page 41	Vehicular Access plan requires clarity regarding east-west route which is required to break up the urban blocks and provide better connections across the site. Vehicles access through urban plaza to west needs clarification regarding whether it is open all hours. Parking measures should be illustrated in the parameter plan e.g. key access areas for parking/how parking will be accommodation within blocks, particularly in Block F if supermarket included. Separate parameter plan is required to show how parking and basements accommodated and implications for open space and underground services such as sewers.	The detailed layout arrangements will be determined at the application stage, including any limitations to hours. The Landowner Masterplan sets out how parking provision is to be accommodated. The inclusion of this level of detail is considered too detailed for the SPD itself however further information can be provided in relation to parking provision more generally within section 11.	<p>Add the following text to the Private Car Objectives section of page 23 in the consultation draft SPD:</p> <p><u>“Proposed parking provision will be assessed in this context using the parking standards identified in the Local Plan and London Plan.”</u></p> <p>Add the following text at the end of the Private car objectives section:</p> <p><u>“London Borough of Tower Hamlets is the Highways Authority in this location and should be consulted on the approach to parking and highways design.”</u></p>
		Page 43	Zone A Codes should have more clarity for block and relationship with railway line, blocks over podium are too close to railway line and need setbacks to mitigate impacts from noise, vibration and easement etc.	As above, the blocks include a 2m set back from the railway line. The design codes are to be amended to protect railway infrastructure.	Amend the design codes to ensure the railway-fronting blocks are designed to protect infrastructure by

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
					inserting: <u>Opening windows and balconies on railway facing facades must be designed in consultation with London Underground</u>
		Page 44	Zone B Codes should have more clarity for block and relationship with railway line, blocks over podium are too close to railway line and need setbacks to mitigate impacts from noise, vibration and easement etc.	As above, the blocks include a 2m set back from the railway line. The design codes are to be amended to protect railway infrastructure.	Amend the design codes to ensure the railway-fronting blocks are designed to protect infrastructure by inserting: <u>Opening windows and balconies on railway facing facades must be designed in consultation with London Underground.</u>
		Page 45	Zone C Codes have poor relationship to A12 with too narrow setback, raising noise and air quality issues. Amenity space at level 2 is compromised by block rising above the podium resulting in very narrow setbacks from the block edge.	The illustrative masterplan sets out a 3.5m setback from the A12 at block C. Noise and air quality testing was also undertaken in support of the Masterplan and addressed within the SPD.	No change.
		Page 46	Zone D Codes. The large footprint is a concern and podium and blocks make this monolithic. Should be more certain about east-west route, rather than 'potential'.	As above, some further detail will be added to the connectivity section in relation to the potential for east-west routes across site.	The following text will be added to the Transport objectives section on page 23 of the consultation draft SPD: <u>"Pedestrian and cycling connections should also be integrated as part of</u>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
					<u>east-west routes through larger development blocks.</u> "
		Page 47	<p>Zone E Codes. More clarity required about how open space for school will be accommodated in Block E alongside residential proposed at podium level. This remains an issue in E7. Should have some specific dimensions in parameter plan. SPD should have clarity on setback and maximum and minimum dimensions for play areas as this is a schools requirement. E6 mentions the school as a standalone building but block and parameters do not give confidence that this would be achieved.</p> <p>Concern about scale of block and need for east-west link. This should be made more certain in Block E, creating a better relationship along the waterfront, relating to more fine grained approach taken in Block G.</p>	<p>The delivery of the school will also need to be in accordance with the relevant educational design standards. These will determine the final format of the building and the relationships with the open space.</p> <p>The final format of the school will determine the form of Block E. Some additional wording will be added to the connectivity section in relation to the east-west route.</p>	<p>No change.</p> <p>No change.</p>
		Page 49	<p>Zone F Codes. F4 incorporates poor setback from A12 raising concerns about noise and air quality. F5 should provide potential to break the monolithic nature. F2 needs to establish the nature of the uses ie supermarket and requirement to accommodate parking and basement.</p>	<p>The illustrative masterplan sets out a 10m setback from the A12 at Block F. Noise and air quality testing was also undertaken in support of the Masterplan and addressed within the SPD.</p>	No change.
		Page 50	<p>Zone G Code. Concern about 16 storey building and SPD should not be so prescriptive about building heights.</p>	<p>As above the illustrative masterplan has been tested against BN.10. All proposals will be tested at application stage.</p>	No change.
		Environmental Design Principles	<p>Concerns about proposed scale and bulk despite Pg. 55 making reference to the illustrative masterplan testing for sunlight, daylight and overshadowing, wind effects etc.</p>	<p>Site specific proposals would also be tested against Local Plan policy BN.10 alongside more detailed environmental testing.</p>	No change.

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			Phasing plan is not convincing and needs more clarity in way they are marked on site and how it will work with existing uses. Should show drawings for each phase, existing uses remaining and how managed to avoid disruption. This will provide clarity to stakeholders regarding their roles and responsibilities, and identification of issues arising. For example, managing a functioning existing supermarket alongside delivering blocks A and B in phase 1.	The phasing plan is to be amended to include the phasing for the northern part of the wider site allocation. The delivery section is also to be amended to deal with the delivery of infrastructure. This will assist in providing further clarity.	Amend the phasing map to include the northern scheme.
033	Keira Murphy, Environment Agency	Whole document	<p>The SPDs include positive key principles to reduce and mitigate flood risk, improve open space and biodiversity. However lacks emphasis on creation of new habitats for wildlife in design principles, and balance between access for people and wildlife.</p> <p>The SPDs do not recognise that the River Lea or Lee Navigation is classified under the Water Framework Directive as a heavily modified waterbody (also in Thames River Basin Management Plan).</p>	<p>Noted.</p> <p>The water impact section to be amended to reference that the River Lea is classified under the Water Framework Directive as a heavily modified waterbody.</p>	<p>No change.</p> <p>Add following text to the start of the Water Impact section of page 55 of the consultation draft SPD:</p> <p><u>“The River Lea is classified under the Water Framework Directive and Thames River Basin Management Plan as a heavily modified waterbody.”</u></p>
		Page 18	Reference to 1.2ha park and a riverside walk welcomed providing these uses allow space for flood water, river access and spaces for wildlife. Should explore opportunities to improve and enhance the River Lea Navigation within these schemes (in line with Thames River Basin Management Plan. Should amend wording as:	Support welcomed.	<p>Insert changes as recommended:</p> <p>“The Environment Agency will require that development is generally set back from the</p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>The Environment Agency will require that development is generally set back from the edge for flooding <u>and biodiversity</u> reasons..... This setback could be used to accommodate the riverside walk <u>when this is balanced with the creation of riverside habitat areas and appropriate native planting.</u></p>	<p>Wording will be amended as suggested.</p>	<p>edge for flooding <u>and biodiversity</u> reasons..... This setback could be used to accommodate the riverside walk <u>with this balanced by the creation of riverside habitat areas and appropriate native planting.</u>"</p>
		Page 54	<p>First paragraph references River Lea Metropolitan SINC and potential to enhance the environment, contributing to BAP habitats. Should recognise that River Lea is designated as a Water Framework Directive waterbody in the Thames River Basin Management Plan. This was classified as bad in 2015 and should reach good or potential by 2027. Reasons for failing are receiving polluted discharges from drainage misconnections, sewerage outfalls and urban runoff. River Lea is heavily modified as a navigable river, flood defence structures and urbanisation. Non-native species, particularly floating pennywort is problem. Should include wording to take account of aim to improve waterbody with reference to Thames River Basin Management Plan and attach a summary report for River Lee (Tottenham Locks to Bow Locks). Actions rely on tackling problems of misconnections and improving urban runoff from highways. There is a specific action for Lea Navigation to replace hard bank reinforcements with soft engineering solution near Gillender Street.</p> <p>Some actions listed in SPD will help improve ecology of river by planting along edge, avoiding overshadowing and light spill, providing bird and bat</p>	<p>The section will be amended to reflect that the River Lea has been identified as a Water Framework Directive waterbody in the Thames River Basin Management Plan, including aim to improve through specific actions.</p> <p>Noted. The section will be with similar wording as suggested.</p>	<p>Include following amendments to Ecology section on page 54 of the consultation draft SPD:</p> <ul style="list-style-type: none"> • "Provide open spaces <u>that link with other green spaces</u>, particularly along River Lea edge with planting that contributes to Biodiversity Action Plan increase in priority species and habitat. • <u>Introduce native planting along artificial channel banks to bring back marginal aquatic habitat including the creation of reedbeds</u> • <u>Setting new development back</u>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			<p>boxes and removing non-native invasive species. Support these but would like more actions that relate to improving river ecology in line with Thames River Basin Management Plan. Should include these amendments:</p> <ul style="list-style-type: none"> • Provide open spaces <u>that link with other green spaces</u>, particularly along River Lea edge with planting that contributes to Biodiversity Action Plan increase in priority species and habitat. • <u>Introduce native planting along artificial channel banks to bring back marginal aquatic habitat including the creation of reedbeds</u> • <u>Setting new development back from the waterway edge/tow path aiming for a minimum of an eight metre green buffer strip</u> • <u>Re-naturalise the river where appropriate by removal of hard banking replacing with softer engineered solutions and removal of obsolete structures to allow passage for fish</u> • <u>Concentrating green roofs and sustainable drainage systems within new development along the river corridors</u> • Avoid overshadowing from buildings and excessive light spill from development onto the river channel to protect river ecology. <u>In terms of light levels the Environment Agency recommends a Lux level of 0-2.</u> • Provide quiet 'unmown' areas for wildlife and <u>include bird and bat boxes/nesting or roosting opportunities within the design of Development</u> 		<p><u>from the waterway edge/tow path aiming for a minimum of an eight metre green buffer strip, where practical</u></p> <ul style="list-style-type: none"> • <u>Re-naturalise the river where appropriate by removal of hard banking replacing with softer engineered solutions and removal of obsolete structures to allow passage for fish</u> • <u>Concentrating green roofs and sustainable drainage systems within new development along the river corridors</u> • Avoid overshadowing from buildings and excessive light spill from development onto the river channel to protect river ecology. (In terms of light levels the Environment Agency recommends a Lux level of 0-2.) <p><u>Provide quiet 'unmown' areas for wildlife and include bird and bat</u></p>

No.	Name & Organisation	SPD section/ issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
					boxes/nesting or roosting opportunities within the design of Development <u>where achievable.</u> "
		Page 54	<p>First bullet should be amended to state that development within 16 metres of the river wall will require consultation with EA because flood defence has statutory defence, essentially being a tidal flood defence. Should amend as:</p> <p>Any development within <u>16m</u> of the River Wall will require consultation with the Environment Agency as this is a tidal flood defence.</p>	Amendment to be made as requested.	Amend text to refer to 16 m.
		Page 54	<p>Should amend second bullet as river wall is deteriorating and replacement may be required:</p> <p>Ensure flood defences are <u>repaired or replaced so that they have a lifetime commensurate with the development (100 years). It should also be demonstrated that the current height of the defence meets the statutory defence level and that defences can be raised in the future in line with the Thames Estuary 2100 plan.</u></p>	Amendment to be made as requested.	Amend the water impact section to reflect comments made.
	Bromley -by-Bow Landowner Masterplan (page 29)		<p>Welcome generous canal side park to south of Three Mills crossing. Whilst also welcome emphasis on active and vibrant canal frontage with public uses and upgraded footpath there is little emphasis on promoting opportunities for habitat enhancements. This is excellent opportunity to encourage biodiversity and assist in River Lea Navigation improvements in Water Framework Directive status. Should also emphasis opportunities of canalside area in reducing flood</p>	The text within the Ecology section on page 54 of the consultation draft SPD, particularly references to BAP priority species and habitat.	No change.

No.	Name & Organisation	SPD section/issue	Summary of consultation comment/issue	Response to comment	Changes proposed to SPD
			risk and climate change by flood storage.		
		Bromley -by-Bow Landowner Masterplan (page 33)	Welcome canal side park but concerned that most southerly building is right against the canal, cutting off access and connectivity. Policies BN.2 and BN.3 are supportive of creation of green infrastructure networks. Normally require an 8m set back from main river to edge of development for access, flood storage/attenuation and biodiversity buffer strip. There should be a continuation of the canal side park to the south and there is more chance of implementation of WFD actions along this stretch with continuous access. Ecological value of park would be reduced if cut off by building and should be linked at both ends for a continuous wildlife corridor. Should amend the masterplan map so buildings are set back by a minimum of 8 metres from canal edge.	Noted. The Masterplan was developed by the landowners therefore the Legacy Corporation is unable to amend this document. However the wording within Section 12 of the SPD itself is to be amended in relation to the setback and the route along the southern part of the site.	No change.

Annex 1 – Sections with more detailed text amendments identified within main consultation summary table

1. Introduction
2. Background, purpose and structure
10. Following a masterplan approach
12. Environmental design principles – open space
14. Delivery of Infrastructure

1. INTRODUCTION

This Supplementary Planning Document (SPD) has been prepared to provide further guidance on the implementation of policies within the Legacy Corporation Local Plan (July 2015) and particularly to help landowners to develop proposals that achieve comprehensive development at Bromley by Bow. It focuses on the area of Local Plan Site Allocation 4.1. The SPD boundary is shown on the adjacent plan. Bromley by Bow is located in the Lower Lea Valley, near the new neighbourhoods that are being created at Sugar House Lane, Pudding Mill and Stratford.

The London Legacy Development Corporation is the local planning authority for the area and is a Mayoral Development Corporation. As a Mayoral Development Corporation it has wider regeneration focused powers which together aim to help achieve its established purpose.

Formed in April 2012, the London Legacy Development Corporation's purpose is 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.

The Legacy Corporation is responsible for delivering one of the most important Olympic legacy promises made in the original London 2012 Games bid. This pledge concerns the physical legacy of the Games – the long-term planning, development, management and maintenance of the Park and its impact on the surrounding area after the London 2012 Games.

At Bromley-by-Bow the Local Plan sets out the aim to achieve this by transforming this location into a new District Centre with new retail, services and businesses along with community facilities, a new primary school

and open space alongside new homes.

As one of several landowners within the area, the Legacy Corporation aims to work with the other landowners at Bromley by Bow to bring forward this transformation. This SPD sets out a detailed vision for this change and guidance that will help development to achieve this. ~~It also includes a~~ An illustrative masterplan has also been prepared by the landowners to help that demonstrates how comprehensive development of the southern part of Bromley-by-Bow can be achieved.

The masterplan has been subjected to a range of environmental testing and both the illustrative masterplan and environmental testing reports have been published alongside this SPD.

It is expected that planning applications for development within the SPD area comply with the policy requirements set out in the Local Plan, including Site Allocation SA4.1 and follow the guidance and framework set by this SPD. Any variation in approach taken by individual planning applications to this framework will need to be justified by demonstrating that this does not compromise delivery of the development and infrastructure components that the Site Allocation and SPD identify for the Bromley-by-Bow South part of the site allocation as a whole.

The environmental testing reports will also set an environmental baseline for environmental impact assessment of individual development schemes. Individual scheme proposals will need to demonstrate that they are cumulatively acceptable when considered against any development with planning permission in the masterplan and SPD area, or where none is approved, against the development assumptions in the illustrative masterplan.

PART A: SETTING THE SCENE

2. BACKGROUND, PURPOSE AND STRUCTURE OF THIS SPD

Background

The Local Plan sets an ambition for development of the site allocation area and explains how important the site allocation is for ensuring the vision for Sub Area 4 of the Local Plan is realised. The development context section of this SPD explains how the Local Plan's ambitions are already being delivered on a number of sites around the SPD area, however the key southern part of the site allocation (Bromley by Bow South) remains undeveloped.

Attempts have been made to bring forward piecemeal and comprehensive development at Bromley by Bow south. A planning application to redevelop the Trad Scaffolding Yard independently was refused on appeal in 2007. Part of the reason for refusal was prematurity and lack of comprehensive development.

Planning permission was granted for a comprehensive mixed use development – led by Tesco - of Bromley by Bow South in 2010. This scheme would have seen the existing supermarket increase significantly in size and required the compulsory purchase of the landholdings on the southern part of the site which were not in Tesco's ownership. However, the CPO decision was not confirmed by the Secretary of State in 2011. This meant the Tesco scheme could not be implemented. The Legacy Corporation and other landowners are now keen to bring forward development of their individual parcels of land.

The site is constrained by the urban motorway of the A12 to the west and railway line to the south which makes it a difficult site for pedestrians and vehicles to access. Nevertheless with the River Lea, Three Mills Conservation Area and the future Sugar House

Lane development area to the east, Bromley-by-Bow presents a significant opportunity to achieve high quality new development that meets a range of needs and provide opportunities that will benefit the surrounding communities and East London more widely. This is reflected in the Local Plan and its ~~the~~ Bromley-by-Bow site allocation policy.

To this end, in a similar manner to earlier development plans for this location, the Local Plan site allocation seeks the range of development described in the Site Allocation and set out in ~~the next part of this~~ document. The key to unlocking this potential, and a significant focus for the guidance in this document, is to provide a way in which individual landowners can bring forward development on their land that meets the Local Plan requirements and ambition for the site overall and to do this in a coherent and complimentary way. This is particularly important for achieving implementation of specific requirements that include the delivery of a primary school, public open space, the new junction and an internal street network which is necessary to achieve acceptable access and egress to and from the A12. Without an approach such as that outlined in this document it would be difficult for individual development proposals to successfully meet the Local Plan requirements.

The Local Plan clearly sets out in site allocation SA4.1 what land uses and infrastructure are required and what applications for planning permission will need to demonstrate, including how they contribute to comprehensive development. The site allocation policy also requires that individual applications demonstrate that a

masterplan approach is followed.

In addition to developing this document, the Legacy Corporation as landowner has been working with the other Bromley-by-Bow south landowners to develop an overall masterplan approach to development of the site allocation area and a delivery strategy to ensure that the required infrastructure can be brought forward alongside development. The illustrative masterplan prepared by the landowners has been developed around the following objectives:

- 1 A centre of gravity around the canal and Three Mills
- 2 Reinstating Three Mills Lane 3
- Normalisation of the A12
- 4 An active canal edge 5 A great place to live
- 6 Responds to the heritage.

~~The illustrative masterplan is presented as an appendix to this SPD.~~

Purpose and structure of this SPD

~~This SPD provides guidance on how relevant policies in the Local Plan will be applied to the site and the principles for how best development of the site can be taken forward. In particular the SPD sets out:~~

Part A: Background

- The planning policy framework
- Development context
- The SPD area

Part B: Policy Guidance

- Considerations for bringing forward the land uses that are required in the site allocation policy
- The transport needs and connectivity requirements for development
- Conservation and heritage issues including identifying key views that development will need to respect
- Broad guidance on height scale and massing

Part C: Delivery

~~The SPD provides guidance on achieving delivery of the development envisaged within the Local Plan site allocation, including the approach to delivery of the infrastructure that has been identified as necessary. It goes on to provide guidance on ~~then comments on~~ how an illustrative masterplan prepared by the landowners meets these policy requirements. Parameter plans and design codes are included at section 9 of this SPD. The illustrative masterplan is Appendix 1. The SPD then goes on to provide guidance on how development and associated infrastructure can be delivered.~~

- Detailed design and ensuring outstanding architecture in future planning applications
- Environmental design principles that development proposals a masterplan would need to address
- Phasing and future planning application boundaries
- Delivery of infrastructure, including delivery of a cohesive public realm.

Consultation and adoption

The Legacy Corporation undertook public consultation on a draft of this SPD between XXX and 12th December 2016. It was adopted on the XXXX 2017. The adoption notice and a consultation report setting out a summary of the comments made, responses to those comments and any changes made in consequence. In providing guidance on the relevant policies of the Local Plan, this SPD will have material weight as a consideration in determination of planning applications. ~~seeking views from local residents, businesses and other stakeholders on the guidance set out in this SPD, including the parameter plans. The masterplan included at Appendix 1 has been included as an illustration of how the Local plan policies and guidance within the SPD can be applied and achieve an acceptable development solution.~~

It is envisaged that the parameter plans included at section 10 of the SPD will provide a framework against which future individual planning applications can be assessed. The parameter plans have been developed from the illustrative masterplan and informed by the environmental testing of that masterplan ~~that has been undertaken~~. It is therefore considered that compliance with the parameter plans and wider policies and

guidance will provide a significant level of certainty to applicants for planning permission and to the Local Planning Authority, particularly in meeting the test of achieving comprehensive development.

Individual scheme proposals will need to demonstrate that they are cumulatively acceptable when considered against any development with planning permission in the masterplan and SPD area, or where none is approved, against the development assumptions in the illustrative masterplan.

~~Following consultation, all comments will be considered and incorporated into an updated SPD for adoption. Once adopted, the SPD will have weight as a material consideration in the determination of planning applications.~~

~~The consultation closes at 5pm on 12th December 2016.~~

~~Comments should be made in writing to:~~

~~Bromley By Bow SPD Consultation,
Planning Policy,~~

~~London Legacy
Development
Corporation,~~

~~10th Floor, 1 Stratford Place, London.
E20 1EJ~~

~~Email: planningpolicy@londonlegacy.co.uk
Telephone: 020 3288 1800~~

10. FOLLOWING A MASTERPLAN APPROACH

The site allocation policy requires future planning applications to demonstrate: “That a masterplan approach for the Site Allocation as a whole is followed”

As set out earlier in this SPD the northern part of the site already benefits from outline planning permission granted in 2012, part of which has been built and part of which has had details approved. Therefore development of the northern part of the site is already following a masterplan approach.

There is no current planning permission for development of the southern part. The landowners of the southern part of the site allocation have been working together on an illustrative masterplan which shows how the southern part of the SPD area could be developed and all the land uses and infrastructure identified in the site allocation provided. The illustrative masterplan is supported by environmental and viability testing. Which demonstrates that as a comprehensive development, it is broadly acceptable and deliverable.

The illustrative masterplan has been reviewed by the Legacy Corporation’s Quality Review Panel (QRP). ~~The illustrative masterplan~~ and has been amended to reflect the comments received.

The illustrative masterplan is considered to

be a solution that broadly meets the policies within the Local Plan and the guidance within this SPD. As individual applications for planning permission come forward, they will need to be considered against policies in the Local Plan and advice in this SPD.

It is intended that the ‘parameter plans’ in this section (which have been developed from the illustrative masterplan) form a framework against which individual applications are assessed. This will help ensure that a comprehensive approach to development of the Bromley-by-Bow south area can be demonstrated. ~~Redevelopment proposals will be expected to be in accordance with the parameter plans.~~

~~The parameter plans are shown on the following pages and accompanying :~~ Design codes are set out on the following pages have been proposed by the landowners to indicate principles which will be incorporated into their developments. Any variation in approach taken by individual planning applications to this framework will need to be justified by demonstrating that this does not compromise delivery of the development and infrastructure components that the Site Allocation and this SPD identify for the Bromley-by-Bow South part of the site allocation as a whole.

New Section Added to Chapter 12

Environmental Design Principles

Open Space / Play space

Open space within the scheme will need to be provided in way that meets the requirements of the Bromley-by-Bow site allocation in the Local Plan and provides a landscape and wider public realm that is useable for leisure and recreation while also functioning as part of a biodiverse location.

Open Space amount: this needs to include a 1.2 hectare park in accordance with the Local Plan site allocation.

- While the park could be provided as more than one space, those spaces will need to be physically connected by paths, streets and other public realm and function in a coherent way.
- The open space will need to function separately from the general public realm and be separate from any private or communal amenity space serving development plots.

Open space function: the open space will need to be multifunctional, providing space and opportunities for outdoor relaxation and informal recreation, from sitting out to active play for all ages, and a biodiversity resource through a range of appropriate planting, including trees.

- Child playspace: a range of play opportunities and equipment should be integrated into the open space and be in accordance with Local Plan Policy BN.8 Maximising Opportunities for Play and the Mayor of London's Shaping Neighbourhoods Play and Informal Recreation SPG.

- Youth Playspace opportunities for Youth Play should be integrated into the open space and public realm (see LLDC Youth Playspace Guidelines publication)
- Use of school playspace: in addition to the 1.2 hectares of open space, the outdoor and indoor space within the school should be made available to the community out of hours for a range of activities including the use of any outdoor pitches and equipment

Interface with streets and wider public realm: where streets and the wider public realm meet the open space, the difference in role should generally be distinct and differentiate function. In any instance where streets and parkland provide a recreational/playable environment, priority should be provided to the leisure and recreational users over vehicles and cyclists both in design and management.

Part of a wider network of open space and waterways : the open space and public realm throughout Bromley-by-Bow will need to be integrated with clear routes and linkages. It should also be designed to function as a part of the wider network of local open spaces focused along the waterways and at Three Mills, including the Leeway and Three Mills Green.

Safe and inviting spaces: design of the open space and public realm linkages should result in open space that is safe, well observed and inviting for those living and working at Bromley-by-Bow and for the wider community.

14. DELIVERY OF INFRASTRUCTURE

The Local Plan Site Allocation (SA4.1) sets out the specific elements of infrastructure that are required to support the development of the site and meet the role that this policy identifies for it as a District Centre in addition to retail and commercial floorspace.

The key elements of SPD-wide infrastructure that are identified are:

- A two form entry primary school;
- A 1.2 hectare park
- A Riverside walk
- A community facility (e.g. library)
- New Junctions with the A12 and new A12 crossings.

It is expected that these will be delivered as part of the development within specific development plots which comprise a mixture of different landownerships (see Section 13, Phasing and Planning Application Boundaries). Delivery will be secured through the use of planning conditions and/or planning obligations, as appropriate.

It is expected that these infrastructure elements will be provided through making land or space available within the relevant development plots with options for direct delivery by the relevant landowner/developer or financial contributions, where appropriate, from one or more plots/developers to enable sufficient funds to be pooled for direct or third party delivery. In each case this would be secured through an appropriate S106 agreement.

Each landowner/developer within the SPD area will be reliant upon some or all of the key elements of infrastructure in order to adequately mitigate the impacts of their

particular development proposals. Where an individual landowner/developer is relying upon the delivery of infrastructure on land it does not control it and the LPA will require some certainty that the relevant elements of infrastructure will be delivered by the landowner/developer who controls the land on which that infrastructure has been identified to be located by this SPD.

The landowners have developed a framework for the delivery of infrastructure required by the whole SPD area. In order to aid demonstration of the comprehensive approach to redevelopment sought by the Local Plan site allocation, individual planning applications will need to be accompanied by a site-specific infrastructure delivery strategy to set out how the individual development will deliver its required infrastructure where that infrastructure is being provided both as part of the specific development and where reliance is being placed upon infrastructure delivery by a third party landowner. Each site-specific infrastructure delivery strategy will need to demonstrate how it contributes to the delivery of SPD-wide infrastructure taking into account the delivery framework

Delivery of the junction

Delivery of the junction will be secured through S106 agreements attached the relevant planning applications. ~~required prior to an agreed trigger point, such as occupation of a proportion of phase 1 of the development with the phase 1 developers being expected to provide contributions to the junction.~~ Any trigger point for delivery or associated financial contributions would need to be agreed at the time the relevant planning applications are determined and would need to take into account the potential reliance on third parties, such as Transport for London, for all or part of

the junction delivery.

~~Although the total cost of the junctions cannot be fully attributed to the first two plots, without the provision of the junctions and crossings, the large-scale mixed-use residential-led development of plots 1 and 2 would be unacceptable in principle (as would development of the rest of the site if it came forward before an agreed trigger point for junction delivery associated with plots 1 and 2).~~

~~Therefore, requiring~~ The financial contributions sought towards delivery of the junction would need to be in accordance with regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010. The LPA anticipates that these financial contributions will be secured via section 106 agreements. TfL may need to be a party to the section 106 agreements to ensure that all necessary parties are committed to providing the junction. The London Borough of Tower Hamlets would also need to be party to agreements where they are the highway authority, e.g. Hancock Road.

When the Bromley by Bow north scheme was granted planning permission, delivery of the southern site was delayed but there was a planning permission in place for the southern site which included a new junction and access arrangements to the site. The Bromley by Bow north planning permission was agreed with the view that the bridges across to Sugar House Lane would be in situ prior to the development being occupied. This would enable residents to cross to Sugar House Lane to access facilities in that development, as well as enabling pedestrian access along Stratford High Street to Stratford. It was however recognised that a new junction or junctions including at grade crossings would be provided when the southern site eventually came forward.

All of the junctions and connections are identified as being required within the Local Plan.

Delivery of the school site

Legacy Corporation planning policy has allocated land within SA4.1 for a two form

entry school (Local Plan policy CI.2). The site was allocated in order to meet background demand from the surrounding area and demand arising from development of the site allocation. For the assessment of scheme viability the area of land required for the school is considered to have only the value of the school use, no value as it cannot be used for any other commercial use. As with other SPD-wide infrastructure being delivered within single planning application boundaries, or landownerships, and where other SPD area development schemes will benefit from this, account will be taken of the impact on the individual scheme within which the infrastructure or land for that infrastructure is to be provided. This principle also applies where such infrastructure falls within more than one planning application boundary.

Funding for the school and temporary education provision

As set out earlier, it is unclear when phases 2 and 3 of the masterplan will come forward. ~~Without the school being capable of delivery~~ Until the school is delivered and made available for admission of pupils earlier phases of the development will need to be able to show that development addresses its impacts in terms of child yield and the need for education provision.