

LONDON BOROUGH OF WALTHAM FOREST

PLANNING COMMITTEE

UPDATE REPORT – THE MALL

DAY/DATE/TIME	VENUE:
Wednesday, 13 December 2017 7.00 pm	ASSEMBLY HALL, WALTHAM FOREST TOWN HALL COMPLEX Forest Road, E17 4JF
CONTACT:	TEL./E-MAIL:
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Dear Member,

The agenda for the meeting on Wednesday, 13 December 2017 was published on Monday, 4 December 2017. Attached is the update report and Draft London Plan (December 2017) Policy Analysis.

Martin Esom
CHIEF EXECUTIVE

MEMBERSHIP:

Chair: Councillor Jenny Gray

Vice-Chair: Councillor Keith Rayner

Councillors: Councillor Paul Douglas (substitute), Councillor Stuart Emmerson (substitute) and Councillor Alan Siggers

AGENDA

**3.1 THE MALL, 45 SELBORNE ROAD, WALTHAMSTOW,
LONDON E17**

(Pages 3 -
24)

Update Report and Draft London Plan (December 2017) Policy
Analysis

**PLEASE NOTE THAT THE AGENDA IS AVAILABLE IN ELECTRONIC FORMAT ON THE
COUNCIL'S WEBSITE VIA THE FOLLOWING LINK:**

<http://democracy.walthamforest.gov.uk>

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LONDON BOROUGH OF WALTHAM FOREST

Committee/Date:	13 th December 2017
Item no.	3.1
Application reference:	171355
Applicant:	Selborne One Limited and Selbourne Two Limited
Location:	The Mall, 45 Selborne Road, Walthamstow, London
Proposed development:	<p><u>Full Planning Permission is sought for:</u></p> <p>Part demolition of The Mall, and its replacement and extension by an additional 8,769sqm (Gross External Area) GEA to be used for Shops, food and drink and leisure (Classes A1, A3, D2); Creation of 42 residential units (Use Class C3) up to a maximum height of 49m (Above Ordnance Datum); Redesign of Town Square, including new children’s play space, landscaping (hard and soft) and lighting; Re-design of the access arrangements to The Mall; Creation of new entrance and associated works for residential buildings at ground floor level fronting onto the Town Square; Extension to the basement car parking area of The Mall by 318sqm and the creation of 33 car parking spaces; Re-design of the servicing arrangements for The Mall; Provision of new plant and renewable energy equipment; All associated and ancillary engineering works and operations.</p> <p>Outline Permission is sought for:</p> <p>Provision of residential dwellings (Use Class C3) in a collection of two low buildings and two tall buildings sitting above the podium created by the development the subject of the full planning permission, ranging in height up to 132.5m AOD; Provision of podium hard and soft landscaping areas, including play space (used by the proposed residential dwellings); Provision of associated services, including waste, refuse, cycle storage, and lighting; Creation of new entrance and servicing areas and associated works for residential buildings at ground floor.</p>

1 FURTHER REPRESENTATIONS RECEIVED:

- 1.1 Since the publication of the Committee Report, further representations in a standard format have been received by the Planning Department (16 in total)

raising further objections in relation to the proposed development. These are listed below:

- Reduction in public space;
- CABE Criticisms;
- Scale, massing, environmental detriment and need for an independent Environmental Impact Assessment;
- Impact on biodiversity and wellbeing;
- Impact on children within the children's playspace;
- Doubt that 'benefits' of scheme will materialise;
- Loss of light
- A development must offer real benefits

1.2 It should be noted that the comments raised above do not raise issues and have already been considered within the published Committee report.

1.3 A further comment has been raised regarding the rare Butterscotch flower on the existing Town Square. However, the applicant has submitted an ecology report as part of the Environmental Statement which states that no such plants have been surveyed on the site.

2 AFFORDABLE HOUSING

Shared Ownership:

2.1 The application would offer 20% affordable housing, which would all be shared ownership in tenure.

2.2 The Mall development: the salary income for the Shared Ownership units would be capped at £90k, however, the final salary range has still to be agreed with the applicant under the s106 agreement, should the Committee be minded to approve the application.

2.3 However, the below table outlines the potential purchaser income ranges which have been secured in the Borough at Unity Works site, Sutherland Road:

Dwelling Size	Number in Scheme	OMV Price Range	Share Sold	Purchasers' Income Range	Live Borough	Work Borough
1-bed	11	£300k - £335k	10x35%, 1x65%*	£31k - £63k*	9 WF, 2 other	10 other, 1 retired*
2-bed	12	£380k - £470k	1x25%, 11x35%	£50k - £89k	7 WF, 5 other	5 WF, 7 other
3-bed	7	£440k - £460k	1x25%, 6x35%	£51k - £89k	2 WF, 5 other	3 WF, 4 other

2.4 In terms of the spread of residents who purchased these units:

- 18 of the purchasers were existing London Borough of Waltham Forest (LBWF) residents;
- 6 of the purchasers both lived and work in LBWF;

- 3 of the purchasers that work in LBWF previously lived in other London boroughs (Hackney, Islington, and Ealing).
- All purchasers work in London, all but one of the purchasers not previously a resident in LBWF lived in other London boroughs, one lived in Hertfordshire.

3 FIRE SAFETY

- 3.1 The applicant has provided the following statement:
- 3.2 Fire safety has been considered throughout the design process, including an initial fire safety design review to inform the scheme design. The design review confirmed that the detailed scheme has been designed in such a way to minimise the risk of fires spreading and incorporates appropriate features should a fire break out. Appropriate escape and evacuation provision has been allowed for as part of the scheme.
- 3.3 Similarly, these matters will be incorporated within the design of the residential towers when the detailed proposals are prepared for reserved matters approval in due course. Access by fire appliances is available both from Selborne Road and the Town Square. The above details will also be subject to scrutiny when Building Regulation Approval is sought before the development commences.

4 CHANGES TO THE LONDON PLAN

- 4.1 The Draft London Plan (December 2017) was published on 29th November 2017 for consultation. The Draft London Plan sets out the strategic policies that guide development in London. The Draft Plan sets out new and amended policies that will form a blueprint for future development and sustainable, inclusive growth of the capital.
- 4.2 As noted in the report as this is published as a first consultation draft of the new London Plan, it is an emerging policy document and therefore the draft plan currently has little weight as the policies within it may change. The Mall application has been assessed against adopted policies in the current development plan. Nevertheless, a high level analysis of revised policies against policies in the current plan has not shown any fundamental change of approach in dealing with applications such as this.
- 5.1 **Officer recommendation remains unchanged.**

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The Mall

Draft London Plan (December 2017) Policy Analysis

The Mayor has published a new Draft London Plan (December 2017). Some of the newly drafted policies are different from the current adopted London Plan - Consolidated with Alterations Since 2011 (2016). Officers have reviewed policies relevant to The Mall application, as set out in the Committee Report, in both the Draft and Adopted London Plans. The Draft London Plan policies in the table below are ones which differ from existing London Plan policies.

It should be noted that the Draft London Plan has limited weight as it is a consultation document but is still a material consideration when deciding on planning applications. The Draft London Plan gains more weight as its goes through the plan-making process. The GLA has stated on the website that weight given to the Draft London Plan lies with the decision maker.

Existing London Plan Policy	Draft London Plan Policy
3.3 Increasing Housing Supply	<p>Policy H1 Increasing housing supply</p> <p>The policy sets out housing targets for boroughs in Table 4.1 for a 10 year period. Waltham Forest 10 year housing target is 1,794.</p> <p>It states:</p> <p>B To ensure that ten-year housing targets are achieved:</p> <p>2) boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through planning decisions, especially the following sources of capacity:</p> <p>a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary</p> <p>c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses</p>
3.4 Optimising Housing Potential	<p>Policy D6 Optimising housing density</p> <p>Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare) has not been carried forward in the Draft London Plan.</p> <p>Optimising housing density is now expected to be decided upon the in Policy D6 Optimising housing density.</p> <p>A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:</p> <p>1) the site context</p> <p>2) its connectivity and accessibility by walking and cycling, and existing and planned</p>

Existing London Plan Policy	Draft London Plan Policy
	<p>public transport (including PTAL)</p> <p>3) the capacity of surrounding infrastructure. Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.</p> <p>B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.</p> <p>1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.</p> <p>2) The ability to support proposed densities through encouraging active travel should be taken into account.</p> <p>3) Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.</p> <p>C The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:</p> <p>3) 405 units per hectare in areas of PTAL 4 to 6.</p> <p>D The following measures of density should be provided for all planning applications that include new residential units:</p> <p>1) number of units per hectare</p> <p>2) number of habitable rooms per hectare</p> <p>3) number of bedrooms per hectare</p> <p>4) number of bedspaces per hectare.</p> <p>E The following additional measures should be provided for all major planning applications :</p> <p>1) the Floor Area Ratio (total Gross External Area of all floors / site area)</p>

Existing London Plan Policy	Draft London Plan Policy
	<p>2) the Site Coverage Ratio (Gross External Area of ground floors /site area)</p> <p>3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).</p> <p>These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.</p>
3.5 Quality and Design of Housing Developments	<p>Policy D4 Housing quality and standards</p> <p>Minimum space standards have been retained.</p>
<p>3.6 Children and Young People’s Play and Informal Recreation Facilities</p> <p>Play and Informal Recreation SPG</p> <p>SPG Play Space Requirement Calculator</p>	<p>Policy S4 Play and informal recreation</p> <p>GLA benchmark is still 10 sqm of dedicated play space per child.</p> <p>New policy states that:</p> <p>B Development proposals for schemes that are likely to be used by children and young people should:</p> <p>2) for residential developments, incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that:</p> <p>a) provides a stimulating environment</p> <p>b) can be accessed safely from the street by children and young people independently</p> <p>c) forms an integral part of the surrounding neighbourhood</p> <p>d) incorporates trees and/or other forms of greenery.</p> <p>3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently</p>
3.11 Affordable Housing Targets	<p>Policy H5 Delivering affordable housing</p> <p>The policy has introduced a strategic affordable housing target as set out below.</p> <p>A The strategic target is for 50 per cent of all new homes delivered across London to be affordable.</p> <p>B Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners.</p>

<p>Existing London Plan Policy</p>	<p>Draft London Plan Policy</p>
	<p>The type of affordable housing expected is set out in policy H7:</p> <p>Policy H7 Affordable housing tenure</p> <p>A The Mayor is committed to delivering genuinely affordable housing.</p> <p>The following split of affordable products should be applied to development:</p> <ol style="list-style-type: none"> 1) a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent) 2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership 3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.
<p>3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes</p>	<p>Policy H6 Threshold approach to applications</p> <p>Through this policy and the Affordable Housing and Viability SPG (adopted August 2017) has introduced a new approach to viability and affordable housing delivery.</p> <p>The policy states that:</p> <p>A The threshold approach applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm (see paragraph 4.6.14 for exclusions to the threshold approach and 4.6.15 for scheme types with bespoke approaches).</p> <p>B The threshold level of affordable housing is initially set at: 1) a minimum of 35 per cent</p> <p>Part E of the policy states that where an applications does not meet the 35% threshold, like the Mall which has 20% affordable housing, it must follow the Viability Tested Route.</p> <p>Part E of the policy outlines the Viability Tested Route as</p> <p>This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:</p> <ol style="list-style-type: none"> 1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG 2) viability tested schemes will be subject to: <ol style="list-style-type: none"> a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the

Existing London Plan Policy	Draft London Plan Policy
	<p>borough)</p> <p>b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)</p> <p>c) Mid Term Reviews prior to implementation of phases for larger phased schemes.</p> <p>Part F states:</p> <p>F Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor’s Affordable Housing and Viability SPG.</p>
3.13 Affordable Housing Thresholds	<p>Policy H6 Threshold approach to applications</p> <p>See above part A.</p>
5.1 Climate Change Mitigation	<p>Policy GG6 Increasing efficiency and resilience</p> <p>There is new requirement around supporting the circular economy as outlined below:</p> <p>To help London become a more efficient and resilient city, those involved in planning and development must:</p> <p>A Seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.</p> <p>B Ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, and avoiding contributing to the urban heat island effect.</p>
5.2 Minimising Carbon Dioxide Emissions	<p>Policy SI2 Minimising greenhouse gas emissions</p> <p>New requirement set out below:</p> <p>C In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:</p> <p>1) through a cash in lieu contribution to the relevant borough’s carbon offset fund, and/or</p> <p>2) off-site provided that an alternative proposal is identified and delivery is certain.</p>
5.10 Urban Greening	<p>Policy G5 Urban greening</p> <p>Part A has not changed but Part B adds in a new requirement for Urban Green Factor.</p>

<p>Existing London Plan Policy</p>	<p>Draft London Plan Policy</p>																																		
	<p>A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.</p> <p>B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.</p> <p>Table 8.2 - Urban Greening Factors</p> <table border="1"> <thead> <tr> <th>Surface Cover Type</th> <th>Factor</th> </tr> </thead> <tbody> <tr> <td>Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site.</td> <td>1</td> </tr> <tr> <td>Wetland or open water (semi-natural; not chlorinated) created on site.</td> <td>1</td> </tr> <tr> <td>Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions^A.</td> <td>0.8</td> </tr> <tr> <td>Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree – see Trees in Hard Landscapes for overview^B.</td> <td>0.8</td> </tr> <tr> <td>Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014^C.</td> <td>0.7</td> </tr> <tr> <td>Flower-rich perennial planting – see Centre for Designed Ecology for case-studies^D.</td> <td>0.7</td> </tr> <tr> <td>Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case-studies^E.</td> <td>0.7</td> </tr> <tr> <td>Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance^F.</td> <td>0.6</td> </tr> <tr> <td>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</td> <td>0.6</td> </tr> <tr> <td>Green wall –modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview^G.</td> <td>0.6</td> </tr> <tr> <td>Groundcover planting – see RHS Groundcover Plants for overview^H.</td> <td>0.5</td> </tr> <tr> <td>Amenity grassland (species-poor, regularly mown lawn).</td> <td>0.4</td> </tr> <tr> <td>Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014^I.</td> <td>0.3</td> </tr> <tr> <td>Water features (chlorinated) or unplanted detention basins.</td> <td>0.2</td> </tr> <tr> <td>Permeable paving - see CIRIA for overview^J.</td> <td>0.1</td> </tr> <tr> <td>Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).</td> <td>0</td> </tr> </tbody> </table>	Surface Cover Type	Factor	Semi-natural vegetation (e.g. woodland, flower-rich grassland) created on site.	1	Wetland or open water (semi-natural; not chlorinated) created on site.	1	Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions ^A .	0.8	Standard trees planted in natural soils or in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree – see Trees in Hard Landscapes for overview ^B .	0.8	Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014 ^C .	0.7	Flower-rich perennial planting – see Centre for Designed Ecology for case-studies ^D .	0.7	Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case-studies ^E .	0.7	Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance ^F .	0.6	Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	Green wall –modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview ^G .	0.6	Groundcover planting – see RHS Groundcover Plants for overview ^H .	0.5	Amenity grassland (species-poor, regularly mown lawn).	0.4	Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014 ^I .	0.3	Water features (chlorinated) or unplanted detention basins.	0.2	Permeable paving - see CIRIA for overview ^J .	0.1	Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0
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<p>5.17 Waste Capacity</p>	<p>Policy SI7 Reducing waste and supporting the circular economy</p> <p>There is new requirement around supporting the circular economy and requires a Circular Economy Statement to be submitted for applications referable to the Mayor, as stated below:</p> <p>B Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:</p> <p>1) how all materials arising from demolition and remediation works will be re-used and/or recycled</p>																																		

Existing London Plan Policy	Draft London Plan Policy
	<p>2) how the proposal's design and construction will enable building materials, components and products to be disassembled and re-used at the end of their useful life</p> <p>3) opportunities for managing as much waste as possible on site</p> <p>4) adequate and easily accessible storage space to support recycling and re-use</p> <p>5) how much waste the proposal is expected to generate, and how and where the waste will be handled.</p>
6.3 Assessing Effects of Development on Transport Capacity	<p>Policy T4 Assessing and mitigating transport impacts</p> <p>Requirement that</p> <p>A development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.</p> <p>B Transport assessments should be submitted with development proposals to ensure that any impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel plans, parking design and management plans, construction logistics plans and delivery and servicing plans will be required in accordance with relevant Transport for London guidance.</p>
6.9 Cycling	<p>Policy T5 Cycling</p> <p>The policy sets out a new requirement:</p> <p>C Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.</p> <p>In Table 10.2 'Minimum cycle parking standards' also has increased the cycle parking requirement from 1 to 1.5 cycle spaces expected per 1 bedroom unit as set out below:</p> <p>Long-stay (e.g. for residents or employees)</p> <ul style="list-style-type: none"> • Dwellings (all) - 1 space per studio 1.5 spaces per 1 bedroom unit 2 spaces per all other dwellings <p>Short-stay (e.g. for visitors or customers)</p> <ul style="list-style-type: none"> • Dwellings (all) - 1 space per 40 units
6.13 Parking	<p>Policy T6 Car parking</p> <p>Policy for car parking is more restrictive as outlined below:</p>

Existing London Plan Policy	Draft London Plan Policy
	<p>A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.</p> <p>B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').</p> <p>D Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6.1 Residential parking to Policy T6.5 Nonresidential disabled persons parking.</p> <p>New requirement for the following:</p> <p>G A Car Park Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on car parking management and car parking design.</p> <p>Policy T6.1 Residential parking</p> <p>The follow part of policy T6.1 for disabled persons is new:</p> <p>G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:</p> <ol style="list-style-type: none"> 1) ensure that at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset 2) demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future <p>H All disabled persons parking bays associated with residential development must:</p> <ol style="list-style-type: none"> 1) be for residents' use only (whether M4(2) or M4(3) dwellings) 2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling 3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure) 4) count towards the maximum parking provision for the development 5) be designed in accordance with the design guidance in BS8300 vol. 1 6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably

<p>Existing London Plan Policy</p>	<p>Draft London Plan Policy</p>
	<p>level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.</p> <p>Table 10.3 - Maximum residential parking standards states that maximum car park provision in all areas of PTAL 5-6 is car free.</p> <p>Policy T6.3 Retail parking</p> <p>Table 10.5 - Maximum retail parking standards states the maximum parking provision for retail in all areas of PTAL 5-6 is car free.</p> <p>Policy T6.5 Non-residential disabled persons parking</p> <p>Policy T6.5 puts a requirement for disabled persons parking for non residential</p> <p>A All non-residential elements of a development should provide at least one on or off-street disabled persons parking bay</p> <p>B Disabled persons parking should be provided in accordance with the levels set out in Table 10.6.</p> <p>C Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.</p> <p>D Designated bays should be marked up as disabled persons parking bays from the outset.</p> <p>E Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate.</p> <p>F Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1.</p> <p>Table 10.6 - Non-residential disabled persons parking standards states</p> <p>Designated bays (Per cent of total parking provision)</p> <ul style="list-style-type: none"> • Workplace - 5% • Retail, recreation and leisure - 6% <p>Enlarged bays (Per cent of total parking provision)</p> <ul style="list-style-type: none"> • Workplace - 5% • Retail, recreation and leisure - 4%
<p>7.4 Local Character</p>	<p>Policy D1 London's form and characteristics</p> <p>Policy D1 has new section on efficient use of land and optimising density and</p>

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	<p>connectivity as set out below:</p> <p>Development Plans, area-based strategies and development proposals should address the following:</p> <p>A The form and layout of a place should:</p> <ol style="list-style-type: none"> 1) use land efficiently by optimising density, connectivity and land use patterns 2) facilitate an inclusive environment 3) be street-based with clearly defined public and private environments 4) deliver appropriate outlook, privacy and amenity 5) achieve safe and secure environments 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest 7) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity 8) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area 9) help prevent or mitigate the impacts of noise and poor air quality 10) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users. <p>B Development design should:</p> <ol style="list-style-type: none"> 1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions 2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well 3) aim for high sustainability standards 4) respect, enhance and utilise the heritage assets and architectural features that make up the local character 5) provide spaces and buildings that maximise opportunities for urban greening to create

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	attractive resilient places that can also help the management of surface water 6) achieve comfortable and inviting environments both inside and outside buildings.
7.5 Public Realm	<p>Policy D7 Public Realm</p> <p>The draft policy set out below is more prescriptive. There is emphasis on safety and natural surveillance, with a new requirement in Part G ensure management and maintenance arrangements are in place in accordance with the Public London Charter (awaiting further details on what the PLC will include or require). Requirement for drinking water fountains has been retained (Policy 7.5 Part C) but with further emphasis and requirement for future management to be considered.</p> <p>Development Plans and development proposals should:</p> <p>A Ensure the public realm is safe, accessible, inclusive, attractive, well-connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces.</p> <p>B Maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people’s safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds.</p> <p>C Be based on an understanding of how the public realm in an area functions and creates a sense of place, during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists.</p> <p>D Ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings.</p> <p>E Ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm.</p> <p>F Ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm.</p> <p>G Ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to</p>

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	<p>those required for its safe management in accordance with the Public London Charter.</p> <p>H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.</p> <p>I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.</p> <p>J Explore opportunities for innovative approaches to improving the public realm such as open street events.</p> <p>K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm.</p> <p>L Ensure that on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Pedestrian crossings should be regular, convenient and accessible.</p> <p>M Ensure the provision and future management of free drinking water at appropriate locations in new or redeveloped public realm.</p>
7.6 Architecture	<p>Policy D1 London's form and characteristics</p> <p>B Development design should:</p> <p>2) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan, through appropriate construction methods and the use of attractive, robust materials which weather and mature well</p>
Policy 7.7 Location and Design of Tall and Large Buildings	<p>Policy D8 Tall buildings</p> <p>The policy sets out the role of tall buildings in accommodating growth as long as they meet the required design quality. Part B (2) says to take account of contributions to new homes, economic growth and regeneration. Part C (1) (g) highlights no adverse reflected glare.</p> <p>Part C (2) sets out the function of tall buildings. Part C 2 (b) outlines how buildings should be serviced, maintained and managed, highlighting safety. There are requirements around access routes in Part C 2 (c) and (d) states it must be demonstrated that the capacity of the area and its transport network is capable of</p>

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	<p>accommodating the quantum of development.</p> <p>There is more detail on environmental impacts in Part C (3), particularly around wind, air and noise.</p> <p>Also new requirement that in Part D Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.</p> <p>Policy set out in full below:</p> <p>Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:</p> <p>Definition</p> <p>A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.</p> <p>Tall building locations</p> <p>B Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:</p> <ol style="list-style-type: none"> 1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below) 2) their potential contribution to new homes, economic growth and regeneration 3) the public transport connectivity of different locations. <p>Impacts</p> <p>C The impacts of a tall building can be visual, functional or environmental.</p> <p>All three elements should be considered within plan-making and in deciding development proposals:</p> <ol style="list-style-type: none"> 1) Visual impacts <ol style="list-style-type: none"> a) The views of buildings from different distances need to be considered, including: <ol style="list-style-type: none"> i Long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views ii Mid-range views from the surrounding neighbourhood – particular attention should be

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	<p>paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality</p> <p>iii Immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.</p> <p>b) Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding</p> <p>c) Architectural quality and materials should be of an exemplary standard to ensure the appearance and architectural integrity of the building is maintained through its lifespan</p> <p>d) Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area</p> <p>e) Buildings in the setting of a World Heritage Site must preserve the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it</p> <p>f) Buildings near the River Thames, particularly in the Thames Policy Area, should not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river</p> <p>g) Buildings should not cause adverse reflected glare.</p> <p>2) Functional impact</p> <p>a) The internal and external design, including construction detailing, the building’s materials and its emergency exit routes must ensure the safety of all occupants</p> <p>b) Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process</p> <p>c) Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas</p> <p>d) It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working</p>

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	<p>in the building</p> <p>e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately</p> <p>f) Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area</p> <p>g) Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings.</p> <p>3) Environmental impact</p> <p>a) Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building</p> <p>b) Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street level conditions</p> <p>c) Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building.</p> <p>4) Cumulative impacts</p> <p>a) The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting. Public access</p> <p>D Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.</p>
7.14 Improving Air Quality	<p>Policy SI1 Improving air quality</p> <p>There is emphasis on significantly improving air quality. Many of the ways of doing this are the same as previous policy e.g. developments should be at least Air Quality Neutral. There is a new requirement for applicants to provide Air Quality Assessments (Part A (5)), previously only required where there was a biomass boiler</p> <p>A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:</p> <p>1) Development proposals should not:</p>

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	<p>a) lead to further deterioration of existing poor air quality</p> <p>b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits</p> <p>c) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality</p> <p>d) create unacceptable risk of high levels of exposure to poor air quality.</p> <p>2) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Particular care should be taken with developments that are in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people.</p> <p>3) The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.</p> <p>4) Development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.</p> <p>5) Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use</p> <p>6) Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.</p>
<p>7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes</p>	<p>D13 Noise</p> <p>The draft policy, set out below, has new emphasis on using the Agent of Change principle to ensure measures do not add unduly to the cost and administrative burdens on existing noise generating uses.</p> <p>A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:</p> <p>1) avoiding significant adverse noise impacts on health and quality of life</p> <p>2) reflecting the Agent of Change principle to ensure measures do not add unduly to the costs and administrative burdens on existing noise generating uses</p> <p>3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable</p>

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	<p>restrictions on development</p> <p>4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)</p> <p>5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation</p> <p>6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles</p> <p>7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.</p> <p>B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations.</p>
<p>8.2 Planning Obligations</p>	<p>Policy DF1 Delivery of the Plan and Planning Obligations</p> <p>More detail on what is expected on viability:</p> <p>A) applicants should take account of development plan policies when developing proposals. Viability testing should be undertaken on site-specific basis where there are clear circumstances creating barriers to delivery</p> <p>B) when making viability case should be site specific and clear evidence on specific issues that would prevent delivery</p> <p>C) Borough's to determine the weight given to a viability assessment alongside other material considerations.</p> <p>Priority contributions have remained the same as affordable housing and public transport.</p> <p>D) Priority to affordable housing contributions and public transport improvements.</p> <p>Next level of importance is:</p> <p>Health/ education on large sites</p> <p>Affordable workspace, culture/ leisure - specifically applied to good growth.</p>

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	There isn't the same mention as in previous policy around the " E Importance should also be given to tackling climate change and air quality, social infrastructure and the provision of small shops."
No equivalent policy	<p>Policy D11 Fire safety</p> <p>A In the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety and ensure that they:</p> <ol style="list-style-type: none"> 1) are designed to incorporate appropriate features which reduce the risk to life in the event of a fire 2) are constructed in an appropriate way to minimise the risk of fire spread 3) provide suitable and convenient means of escape for all building users 4) adopt a robust strategy for evacuation which all building users can have confidence in