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PHV.3.01	D1	<p><b>Policy D1 London's form, and characteristics character and capacity for growth</b></p> <p><i>(This policy now integrates Policy D2 parts A and B with Policy D6 parts AA and B</i></p> <p><i>Paragraphs are renumbered)</i></p>
PHV.3.02	D1 <del>D2A</del> A	<p><b>Defining an area's character to understand its capacity for growth</b></p> <p><del>A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, which covers the following elements. Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:</del></p> <p><b>A</b> To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, which covers the following elements. <b>Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:</b></p> <p>1) <b>demographic make-up and</b> socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)</p>

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		<p>2) housing types and tenure</p> <p>...</p> <p>4) <b>existing and planned</b> transport networks (particularly walking and cycling networks), and public transport connectivity (<del>existing and planned</del>)</p> <p>...</p> <p>10) existing and emerging Development Plan designations</p> <p><del>11) existing and future uses and demand for new development, including housing requirements and social infrastructure.</del></p> <p><b>12) land uses</b></p> <p><b>13) views and landmarks</b></p>
PHV.3.03	D1 <del>D6AA B</del>	<p><b>Planning for growth</b></p> <p><del>D6AA B In preparing Development Plans and area based strategies, boroughs should follow the approach set out in part A to determine the parameters of development that will optimise the capacity of allocated sites, taking account of</del> <b>plan to meet</b></p>

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		<p><b>borough-wide growth requirements, including their overall housing targets, by:</b></p> <p><b>1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and</b></p> <p><del>D6B</del> <b>2) The assessing the capacity of existing and planned physical, environmental and social infrastructure to support new development proposed by Development Plans should be assessed the required level of growth</b> and, where necessary, improvements to infrastructure capacity should be planned <b>in infrastructure delivery plans or programmes</b> to support growth; <b>and</b></p> <p><b>3) Following the design-led approach (set out in Policy D1B) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and where appropriate the amount of floorspace that should be provided for different land uses.</b></p>

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PHV.3.04	D1 Paragraph <del>3.1.1A</del> 3.1.1	<p><b>This Plan provides a policy framework for delivering good growth through good design. Policy D1 Part A sets out the requirements for assessing an area's characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.</b> <del>Policies D1 London's form and characteristics and D2 Delivering good design work together to embed good design principles from the outset of the design process and ensure these are carried through to the completion of a development. Policy D1 sets out the key characteristics that should be delivered through the design of London's buildings and spaces in terms of their form and layout, quality and character, and the user experience they provide. Throughout the period of assessment of planning applications, boroughs and applicants should cross reference between policies D1 and D2 to ensure these key design principles are addressed and carried through each stage of the planning and design process.</del></p>
PHV.3.05	D1 Paragraph <del>3.2.2</del> 3.1.2	<p><b>Understanding the existing character and context</b> of individual areas is essential in determining how different places may <b>best</b> develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help</p>

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		inform an understanding of an area's capacity for growth <b>and is crucial for ensuring that growth and development is inclusive.</b>
PHV.3.06	D1 Paragraph <b>3.1.3</b>	<b>It is important to understand how places are perceived, experienced and valued. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work.</b>
PHV.3.07	D1 Paragraph <del>3.2.3</del> <b>3.1.4</b>	<del>This evidence gathering and evaluation of alternative options, alongside an understanding of the requirements for growth,</del> <b>Area assessments should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements. This analysis</b> should form the foundation of <del>Local Plan</del> <b>Development Plan</b> preparation <del>or work on an</del> <b>and</b> area-based <del>strategy</del> <b>strategies</b> . This process will be fundamental to inform decision making on how places should develop, speeding up the Development Plan process and bringing about better-quality development. <b>It will also help speed up planning decision making by providing an easily accessible knowledge-base about an area that is integrated in Development Plan policies.</b>

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PHV.3.08	D1 Paragraph <b>3.1.5</b>	<b>When identifying the growth potential of areas and sites the sequential spatial approach to making the best use of land set out in GG2 parts A to BA should be followed.</b>
PHV.3.09	D1 Paragraph <b>3.1.6</b>	<b>The process, set out in Policy D1, of evidence gathering and establishing the location and scale of growth in an area provides the opportunity to engage and collaborate with the local community and other stakeholders as part of the plan making process, enabling them to help shape their surroundings. The requirements of Policy D1 Parts A and B help to inform the identification of locations that may be suitable for tall buildings, see Policy D8 Tall buildings.</b>
PHV.3.10	D1 Paragraph <b>3.1.2A 3.1.7</b>	<b>As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.</b>

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PHV.3.11	D1 Paragraph <b>3.1.8</b>	<b>The Mayor will provide supplementary planning guidance to provide additional support for boroughs when implementing the policy. <del>(3.2.2)</del> Figure 3.2 3.1 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.</b>
PHV.3.12	D1  <b>Figure 7.4</b> <del>3.2</del> <b>3.1</b>	<b>Outline Character Map of London (<del>MAP</del> AMENDED)</b>
PHV.3.13	D1A	<b>Policy D1A Infrastructure requirements for sustainable densities</b>  <i>(This policy contains the elements of the original Policy D6 relating to the assessment of existing and planned infrastructure capacity and how to ensure new development is responds to this – D6 parts A2, B1-3A)</i>
PHV.3.14	D1A	<del>D6B1)</del> <b>A</b> The density of development proposals should:

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	<del>D6B1-D6A2</del> <b>A</b>	<p>1) <del>be based on</del> <b>consider</b>, and <b>be</b> linked to, the provision of future planned levels of infrastructure rather than existing levels,</p> <p><del>D6A2</del> 2) <b>its be proportionate to the site's</b> connectivity and accessibility by walking, <del>and</del>-cycling, and public transport <b>to jobs and services</b> (including <b>both</b> PTAL <b>and access to local services</b> <sup>28A 22A</sup>)</p> <p><del>28A 22A</del> <b>PTAL and Time Mapping (TIM) catchment analysis is available on TfL's WebCAT webpage. TIM and provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see PTAL in glossary for more information on WebCAT and Time Mapping).</b></p>
PHV.3.15	D1A <del>D6B3</del> <b>B</b>	<b>B</b> 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

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		<p>capacity will exist at the appropriate time. This may mean, <del>in exceptional circumstances,</del> that <b>if the</b> development is contingent on the provision of <del>the necessary-new</del> infrastructure, <del>and including</del> public transport services, <del>and it will be appropriate</del> that the development is phased accordingly.</p>
PHV.3.16	<p>D1A <del>D6B3A)</del> C</p>	<p><b>C</b></p> <p><b>When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a local site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will should be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.</b></p>

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PHV.3.17	D1A Paragraph <del>3.6.2</del> 3.1A.1	<b>Infrastructure assessments provision</b> should be proportionate to the scale of <del>the</del> development. <b>The locations and scale of growth will be identified through boroughs' Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs' infrastructure delivery plans or programmes.</b> <del>3.6.3</del> Boroughs and infrastructure providers should also consider the cumulative impact of multiple development proposals in an area.
PHV.3.18	D1A Paragraph <del>3.6.2A</del> 3.1A.2	<b>If developments comes forward with capacities a capacity in excess of those allocated in the relevant Development Plan, and therefore in excess of that which could be supported by current or future planned infrastructure, a site-specific infrastructure assessment will be required. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.</b>
PHV.3.19	D1A Paragraph	<del>The surrounding infrastructure of all types is a key element in determining the optimum density of a site.</del> <b>The capacity of existing and future public transport services</b> , and the connections they provide, should be taken into consideration, as should the potential to increase this capacity through financial contributions and by joint working with Transport for

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	<del>3.6.3</del> 3.1A.3	London. In general, the higher the public transport access and connectivity of the site, and the closer it is to a town centre or station, the higher the density and the lower the car parking provision should be. <del>D6B2</del> The ability to support <del>proposed</del> <b>higher</b> densities through encouraging <b>increased levels of</b> active travel should be taken into account.
PHV.3.20	D1A Paragraph <del>3.6.3A</del> 3.1A.4	Minor developments will typically have incremental impacts on local infrastructure capacity. <del>7.</del> <b>The cumulative demands on infrastructure of minor development which</b> should be addressed in boroughs <del>h</del> infrastructure <del>D</del> delivery <del>P</del> plans <b>or programme.</b> ...
PHV.3.21	D1A Paragraph <del>3.</del> <del>6.4</del> 3.1A.5	... In many areas of London higher densities could be supported by maximising the potential of active travel. Those <del>exceptional</del> <b>limited</b> circumstances for which Part <del>B3</del> of the policy could apply include development being brought forward in areas where planned public transport schemes will significantly improve accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth Line, and the Bakerloo Line Extension. ...
PHV.3.22	D1B <del>D6</del> D1B	<b>Policy <del>D6</del> D1B Optimising housing density site capacity through the design-led approach</b>

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		<p><i>(This policy combines Policy D6 part A, AA, EA and the design outcomes from the original Policy D1. It also integrated Policy D6 parts D and E into the supporting text.</i></p> <p><i>Paragraphs are renumbered)</i></p>
PHV.3.23	D1B <del>D6A</del> A	<p><b>A</b>      <b>All development proposals must make the most efficient best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D1A), and that best delivers the requirements set out in Part B.</b></p> <p><del>and be developed designed at the optimum density. The optimum density processes required by parts A and B of a development should result from Policy D2 Delivering good design set out how a design-led approach to determine will inform the evaluation of a site’s context and help to identify its capacity of the site. for growth. Particular consideration should be given to the following evaluation criteria to determine optimal development density:</del></p> <p><del>1) the site context, including surrounding built form, uses and character;</del></p>

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		<p style="color: green;">2) Moved to D1A A2</p> <p style="color: green;">3) <del>the capacity of surrounding infrastructure (see Part B)</del></p>
PHV.3.24	<p>D1B</p> <p style="color: green;">D1A B</p>	<p style="color: green;"><del>A — Development Plans, area-based strategies and development proposals should ensure the design of places addresses the following requirements:</del></p> <p style="color: red;"><del>A — The form and layout of a place should:</del></p> <p style="color: red;"><del>B — Development design should</del></p> <p style="color: green;"><b>B          Development proposals should:</b></p> <p style="color: red;"><b><u>Form and layout</u></b></p> <p style="color: green;"><del>D1-B1)          use land efficiently by optimising density, connectivity and land use patterns</del></p> <p style="color: green;"><del>D1-B2)</del>    <b>1) respond enhance</b> local context by delivering buildings and spaces that <b>positively respond to local distinctiveness through their layout, orientation, are positioned and of a</b> scale, appearance and shape, <b>with due regard to</b> <del>that responds successfully to the identity and character of the</del></p>

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		<p><del>locality, including to</del> existing and emerging street hierarchy, building types, forms and proportions</p> <p><del>D1-B3)</del> 2)</p> <p><del>D1-B4)</del> 3)</p> <p><del>D1-B5)</del> 4)</p> <p><b><u>Experience</u></b></p> <p><del>D1-B6)</del> 5) achieve safe, <del>and</del> secure <b>and inclusive</b> environments</p> <p><del>D1-B7)</del> 6)</p> <p><del>D1-B8)</del> 7)</p> <p><del>D1-B9)</del> 8)</p> <p><del>D1-B10)</del> 9)</p> <p><del>D1-B11)</del> 10) achieve <b>indoor and outdoor environments that are</b> comfortable-and inviting <b>for people to use</b> environments <del>both inside and outside buildings.</del></p>

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		<p><b><u>Quality and character</u></b></p> <p><del>D1-B12)</del> <b>11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and</b> respect, enhance and utilise the heritage assets and architectural features that <del>make-up</del> <b>contribute towards</b> the local character</p> <p><del>D1-B13)</del> <b>12)</b></p> <p><del>D1-B14)</del> <b>13) aim for high sustainability standards (with reference to the policies within London Plan Chapter's 8 and 9) and take into account the principles of the circular economy</b></p> <p><del>D1-B15)</del> <b>14)</b></p>
PHV.3.25	D1B <del>D6AA</del> C	<p><b>C</b> Where <del>these optimised</del> development parameters for allocated sites have been set out in a <b>Development Plan</b>, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.</p>

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PHV.3.26	D1B <del>D6EA</del> D	<b>D</b> <b>Proposed development that does not demonstrably unjustifiably fails to optimise the density capacity of the site in accordance with this policy should be refused.</b>
PHV.3.27	D1B <del>D6-C</del>	<p><del>C</del> — The higher the density of a development, the greater the level of scrutiny that is required of its design. For residential development it is particularly important to scrutinise the qualitative aspects of the development design described in <u>Policy D4 Housing quality and standards</u>, and the <del>its</del> 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 <u>Policy D2 Delivering good design</u> and <del>those</del> with a residential component must submit a management plan if the proposed density is above:</p> <ul style="list-style-type: none"> <li><del>1)110 units per hectare in areas of PTAL 0 to 1; or</del></li> <li><del>2)240 units per hectare in areas of PTAL 2 to 3; or</del></li> <li><del>3)405 units per hectare in areas of PTAL 4 to 6.</del></li> </ul> <p><i>(This element of Policy D6 has been incorporated into Policy D2 part D1) and supporting text of Policy D2)</i></p>

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PHV.3.28	D1B <del>D6D-</del> <del>D6E</del> <del>D6EA</del>	<del>D6D-</del> moved to 3.1B.23  <del>D6E</del> moved to 3.1B.24  <del>D6EA</del> moved to D1B D above
PHV.3.29	D1B  Paragraph 3.6.1 <del>3.1B.1</del>	For London to accommodate <b>the</b> growth <b>identified in this Plan</b> in an inclusive and responsible way every new development needs to make the most efficient use of land. <del>This will mean developing at densities above those of the surrounding area on most sites.</del> The design of the development must <b>optimise housing density site capacity. Optimising site capacity means ensuring that it represents the development takes the most appropriate form of development for the site and that it is consistent with relevant planning objectives and policies. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as Gypsy and Traveller pitches – is the optimum development for the site.</b>
PHV.3.30	D1B	A design-led approach to optimising <b>density site capacity</b> should be based on an evaluation of the site's attributes, its surrounding context and <b>its</b> capacity for growth <b>to determine the appropriate form of development for that site.</b>

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	Paragraph <del>3.6.1A</del> 3.1B.2	
PHV.3.31	D1B Paragraph <del>3.6.1A</del> 3.1B.3	<p>The area assessment required by Policy D1A, coupled with an area's assessed capacity for growth as required by Policy D1B, will assist in understanding a site's context and determining what form of development is most appropriate for a site. Design options for the site should be assessed to ensure the proposed development best delivers the design outcomes of Policy D1B Part B. <del>and the most appropriate development form, which are determined by following the process set out in <u>Policy D2 Delivering good design</u>, <u>Policy H1 Increasing housing supply</u>, <u>Policy H2 Small sites</u> and <u>Policy H3 Monitoring housing targets</u> set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved.</del></p> <p><del>Policy D1 London's form and characteristic and Policy D2 Delivering good design support the application of the design-led approach to optimising density. Policy D1 sets out design principles and physical characteristics that new development should deliver. Policy D2 parts A and B require the evaluation of the current characteristics of an area, including its infrastructure, and using this evaluation of evidence to establish what the most appropriate form of development is for an area in terms of scale, height, density, layout and land use, to create places which meet the requirements of Policy D1.</del></p>

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PHV.3.32	D1B Paragraph <del>3.6.1B</del> <b>3.1B.4</b>	<b>Designating appropriate development capacities through site allocations <del>allows</del> enables boroughs to proactively optimise the <del>density</del> capacity of strategic sites through a consultative design-led approach that allows for meaningful engagement and collaboration with <del>neighbourhoods,</del> local communities, organisations and businesses. <del>Boroughs should consider development options for strategic sites to determine the parameters of development that optimise the capacity of a site.</del></b>
PHV.3.33	D1B Paragraph <del>3.6.1C</del> <b>3.1B.5</b>	<b>Developers should have regard to designated development capacities in allocated sites and ensure that the design-led approach to optimising capacity on unallocated sites is carefully applied when formulating bids for development sites. The sum paid for a development site is not a relevant consideration in determining acceptable densities and any overpayments cannot be recouped through compromised design or reduced planning obligations.</b>
PHV.3.34	D1B Paragraph <del>3.1.1</del> <b>3.1B.6</b>	...The form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, <b>be inclusive</b> , and make the best use the city's finite supply of land, ...This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services. ( <del>see also</del> )

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		<del>Policy D6 Optimising housing density). Alternative building forms of appropriate density should be considered as part of the design process.</del>
PHV.3.35	D1B Paragraph <del>3.1.2</del> 3.1B.7	Developments that show a clear understanding of, and relationship with <b>the context of the site distinctive features of a place</b> are more likely to be successful. <b>These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value.</b> <del>(3.6.1A)</del> <b>The Mayor will provide further guidance on assessing and optimising site capacity</b> <del>and optimising density through a design led approach.</del>
PHV.3.36	D1B Paragraph <del>3.1.10</del> 3.1B.10	To minimise the use of new materials, the following circular economy principles (see also Figure <del>3.1</del> 3.2) should be taken into account at the start of the design process <b>and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement (see Policy SI7):</b>  ...  ...

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		<ul style="list-style-type: none"> <li>• <b>designing for longevity</b></li> <li>• designing for adaptability <b>or flexibility</b></li> <li>• ...</li> <li>• using <b>systems, elements or</b> materials that can be re-used and recycled.</li> </ul>
PHV.3.37	D1B Paragraph  <del>3.1.11</del> <b>3.1B.11</b>	<p>Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible. Further guidance on the application of these principles <b>through Circular Economy Statements will be</b> is provided <del>in the guidance on Circular Economy Statements and London's circular economy route map<sup>23</sup></del>.</p> <p><del>23 — London's circular economy route map, GLA &amp; London Waste and Recycling Board. 2017</del></p>

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PHV.3.38	D1B Paragraph  3.1.12 3.1B.12	Figure 3.1 3.2 shows a hierarchy for building approaches which maximises use of existing materials.
PHV.3.39	Figure 3.2	<b>Figure 3.1 3.2- Circular economy hierarchy for building approaches.</b>
PHV.3.40	D1B Paragraph3.1B.15	<b>Development should create inclusive places that meet the needs of all potential users.</b>
PHV.3.41	D1B Paragraph 3.6.9 3.1B.22	<b>Monitoring density and site capacity</b>  <del>Housing density has been measured and monitored in London over recent years in units per hectare (u/ha). Average density across London of new housing approvals in the monitoring year 2015/16 was 154 u/ha with the highest average density being recorded in Tower Hamlets at 488</del>

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		u/ha. <del>However, c</del> Comparing density between schemes using a single measure can be misleading as it is heavily dependent on the area included in the planning application site boundary as well as the size of residential units. ...
PHV.3.42	D1B Paragraph <del>3-6.10</del> <b>3.1B.23</b>	To help assess, monitor and compare development proposals several <b>measures of density</b> are required to be provided by the applicant. Density measures related to the residential population ( <del>part D of Policy D6 Optimising housing density</del> ) will be relevant for infrastructure provision, while measures of density related to the built form and massing ( <del>part E of Policy D6 Optimising housing density</del> ) will inform its integration with the surrounding context. <del>H6D</del> The following measurements of density should be provided for all planning applications that include new residential units: ...
PHV.3.43	D1B Paragraph <del>3-6.10</del> <b>3.1B.24</b>	Measures relating to height <b>and scale</b> should be the maximum height of each building or major component in the development. Boroughs should report each of the required density measures provided by the applicant when they submit details of the development to the London Development Database. <del>H6E</del> The following additional measurements should be provided for all major planning applications:  1) the Floor Area Ratio (total Gross External Area of all floors / site area) 2) the Site Coverage Ratio (Gross External Area of ground floors /site area)

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		<p>3) the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).</p> <p><del>These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.</del></p>
PHV.3.44	<p>D2</p> <p>A</p> <p>B</p>	<p><del>Initial evaluation</del></p> <p>A                    <i>moved to Policy D1 A</i></p> <p><del>Determining capacity for growth</del></p> <p>B                    <del>The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate forms of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.</del></p> <p><del>Design analysis and visualisation</del>                    <i>moved below to D2 B</i></p> <p><i>(The original parts A and B of Policy D2 have been relocated to the new Policy D1).</i></p>

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PHV.3.45	D2 <del>D2D</del> A	<b>Design quality analysis and development certainty</b>  <b>A</b> Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the <del>characteristic requirements</del> set out in <del>Policy D1 London's form, character and capacity for growth</del> <b>Policy D1B Part B Optimising site capacity through the design-led approach.</b>
PHV.3.46	D2 <del>D2C</del> B	<b>B</b> Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform <b>plan-making</b> and <b>decision-taking, and to</b> engage Londoners in the planning process.
PHV.3.47	D2 <del>D2E</del> C	<b>C</b> Design and access statements submitted with development proposals should <del>provide relevant information to</del> demonstrate the proposal meets the design requirements of the London Plan.
PHV.3.48	D2	<b>D</b> <b>The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the</b>

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	D2F D	<p><b>analytical tools set out in the policy in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. <del>Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice.</del> Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation, before a planning application is made, or demonstrate that it has undergone a local borough process of design scrutiny, based on the principles set out in Part G if they:</b></p> <ol style="list-style-type: none"> <li>1) <del>are above the applicable density indicated in Part C of Policy D6 Optimising housing density;</del> <b>include a residential component and exceeds 350 units per hectare;</b> or</li> <li>2) propose a building defined as a tall building by the borough (see <u>Policy D8 Tall buildings</u>), or that is more than 30m in height where there is no local <b>definition of a tall building</b><del>definition.</del></li> </ol>
PHV.3.49	D2	<i>(change of policy letter only)</i>

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	D2G E	
PHV.3.50	D2 D2H F	<p><b>F</b> The design quality of development should be retained through to completion by:</p> <ol style="list-style-type: none"> <li>1) <b>ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development</b> <del>having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments</del></li> <li>...</li> <li>...</li> <li>4) local planning authorities <b>considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion</b> <del>using architect retention clauses in legal agreements where appropriate.</del></li> </ol>

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PHV.3.51	D2 Paragraph 3.2.1	<del>Policy D1 London's form and, characteristics and Policy D2 Delivering good design should be read together. It is intended that</del> The processes and actions set out in <del>Policy D2 Delivering good design</del> <b>the Policy</b> will help ensure development delivers good design <del>as demonstrated by the principles and best practice outcomes set out in Policy D1.</del> The responsibility for undertaking a particular process or action will depend on the nature of the development or plan; however, the outcome of this process must ensure the most efficient use of land is made so that the development on all sites is optimised.
PHV.3.52	D2 Paragraph <del>3.2.4</del> <b>3.2.2</b>	These techniques can also be used as part of the plan-making process to assess growth options and forms of development, as described in <b>Policy D1</b> Part B.
PHV.3.53	D2 Paragraph <del>3.2.6</del> <b>3.2.4</b>	The <b>Mayor's Design Advocates (MDAs)</b> will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. <b>MDAs are also panel members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focuses on the review of Mayoral investments, but can provide design</b>

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		<b>review sessions for development proposals referred to the Mayor, where they have not previously been subject to review, or for schemes of particular significance.</b>
PHV.3.54	D2 Paragraph <del>3.2.7</del> <b>3.2.5</b>	All development proposals should <del>follow this guidance, and</del> be subject to a level of scrutiny appropriate to the scale <b>and/or impact</b> of the <b>project site</b> . This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design <b>officers and conservation</b> officers. <del>as well as formal design review.</del> <b>Development proposals required to undergo design review as set out under Part FD will form a small portion of overall planning applications in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.</b>
PHV.3.55	D2 Paragraph <del>3.2.7A</del> <b>3.2.6</b>	<b>The Mayor has published a London Quality Review Charter, with accompanying guidance. The Charter promotes a consistent approach across London's design review sector and promotes transparency of process. The Charter builds on the established 2013 guidance<sup>23A</sup> (from the Design Council / Commission for Architecture and the Built Environment (CABE), Landscape Institute (LI), Royal Town Planning Institute (RTPI) and the Royal Institute of British Architects (RIBA)), which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available.</b> <del>The Charter Mayor has produced guidance on design reviews,</del> <b>including guidance on</b> how panels and processes should be managed

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		<p><b>and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor's Good Growth by Design Programme, is developing a support offer to London's boroughs and London's review sector, for example, offering advice to boroughs wishing to put in place a design review function.</b></p> <p><b>23A From the Design Council / Commission for Architecture and the Built Environment (CABE), Landscape Institute (LI), Royal Town Planning Institute (RTPI) and the Royal Institute of British Architects (RIBA available at <a href="https://www.designcouncil.org.uk/sites/default/files/asset/document/DC%20Cabe%20Design%20Review%2013_W_0.pdf">https://www.designcouncil.org.uk/sites/default/files/asset/document/DC%20Cabe%20Design%20Review%2013_W_0.pdf</a>)</b></p>
PHV.3.56	D2 Paragraph <del>3.2.8</del> 3.2.7	The <b>scrutiny</b> of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues <del>and be used to consider if a scheme meets the requirements of <u>Policy D1 London's form characteristics</u></del> (see also requirements of <u>Policy D3 Inclusive design</u> ).

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PHV.3.57	D2 Paragraph <del>D6C</del> 3.2.8	<p><b>For residential development it is</b> particularly <b>important to scrutinise</b> the qualitative aspects of the development design described in <u>Policy D4 Housing quality and standards</u>. <del>3.6.7 The proposed design and management of the developments should be thoroughly scrutinised during the planning process. Residential portions should be scrutinised in line with part C of Policy D6 Optimising housing density.</del> The higher the density of a development the greater this <b>scrutiny</b> should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in <u>Policy D4 Housing quality and standards</u> help ensure that as densities increase, <b>the</b> quality of internal residential units is maintained.</p>
PHV.3.58	D2 Paragraph <del>3.6.8</del> 3.2.9	<p><del>To ensure servicing and day-to-day management of</del> <b>Higher density residential developments<sup>23B</sup> should demonstrate their on-going sustainability in terms of servicing, maintenance and management.</b> <del>have been considered in designing higher density development the</del> <del>management plans</del> <del>required to be submitted with higher density development proposal by part C of this policy, must include</del> <b>Specifically,</b> details <b>should be provided</b> of day-to-day servicing and deliveries, <del>and</del> longer-term maintenance implications. <del>Management plans should provide details on</del> <b>and the long-term</b> affordability of running costs and service charges (by different types of occupiers). <del>Costed plans should set out</del></p>

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		<p><del>how management arrangements will work in mixed-tenure schemes and the way in which residents' views will be taken into account in delivering affordable services.</del></p> <p><b>23B Higher density residential developments are those with a density of at least 350 units per hectare</b></p>
PHV.3.59	D2 Paragraph <del>3.2.9</del> <b>3.2.10</b>	<p>It is important that <b>design quality is maintained throughout the development process</b> from the granting of planning permission to completion of a development. What happens to a design after planning consent can be instrumental to the success of a project and subsequent quality of a place. Changes to designs after the initial planning permission has been granted are often allowable as minor amendments, <b>or in the case of outline applications in the form of additional necessary detail.</b></p>
PHV.3.60	D2 Paragraph <del>3.2.9</del> <b>3.2.11</b>	<p><b>Design codes submitted with outline planning applications for large developments can be one such way to ensure that design quality is upheld throughout the planning process. Their main purpose is to describe the key design principles of a development proposal in a simple, concise and mainly graphical format, and they should draw on the proposal's layout, massing and heights approach to define the principal features that make up the overall design integrity of the scheme.</b></p> <p>Assessment of the design of large elements of a development, such as landscaping or</p>

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		building façades, should be undertaken as part of assessing the whole development and not deferred for consideration after planning permission has been granted.
PHV.3.61	D2 Paragraph  3.2.10 3.2.12	<p><b>Having a sufficient level of design information, including key construction details provided as part of the application, can help to ensure that the quality of design will be maintained if the permitted scheme is subject to subsequent minor amendments. However,</b> it is <b>also</b> generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish<sup>24</sup>.</p> <p><del>Consideration should be given to</del> <b>Securing the design team’s ongoing involvement can be achieved in a number of ways, such as through</b> a condition of planning permission, <del>or</del> <b>as a design reviewer, or through an architect retention clause in a legal agreement. where this is not possible.</b></p>
PHV.3.62	D3 AA	<p><b>AA Boroughs, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.</b></p>
PHV.3.63	D3 A	<p><b>A Development proposal should</b> <del>To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to</del> achieve the highest standards of accessible and inclusive design. <b>They should</b> <del>ensuring they:</del></p>

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		<p><b>1A) be designed taking into account London's diverse population</b></p> <p><b>1B) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion</b></p> <p>4) <i>moved to 2A.</i></p> <p>2) <del>be are</del> convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment</p> <p><b>2A) can be able to be</b> entered, <del>and</del> used <b>and exited</b> safety, easily and with dignity for all</p> <p>3) <del>are be</del> designed to incorporate safe and dignified emergency evacuation for all building users. In <b>all</b> developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a <b>suitably sized</b> fire evacuation lift suitable to be used to evacuate people who require level access from the building.</p>
PHV.3.64	D3 B	<p>B <del>The</del> Design and Access Statements, submitted as part of <del>planning applications</del> <b>development proposals</b>, should include an inclusive design statement.</p>

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PHV.3.65	D3 Paragraph 3.3.1	<p><b>The built environment includes the internal and external parts of buildings, as well as the spaces in between them.</b> Despite recent progress in building a more accessible city, too many Londoners still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or how it is managed. An <b>inclusive design approach</b> helps to ensure the diverse needs of all Londoners are integrated into <b>Ddevelopment Plans and</b> proposals from the outset. This is essential to ensuring that the built environment is safe, accessible and convenient, and enables everyone to access the opportunities London has to offer. <del>regardless of their age, disability, ethnicity, gender, gender expression, faith, economic circumstance or whether they are travelling with children, or are carrying shopping or luggage. Inclusive design is fundamental to improving the quality of life for disabled and older people in particular.</del></p>
PHV.3.66	D3 Paragraph <b>3.3.1A</b>	<p><b>Inclusive design is indivisible from good design. It is therefore essential to consider inclusive design and the development's contribution to the creation of inclusive neighbourhoods at the earliest possible stage in the development process.</b> <del>a scheme's development and inclusive design should be embedded into a project</del> <b>from initial conception through to completion, and where relevant the occupation and in-on-going management and maintenance of the development.</b> <del>Master plans and design codes should therefore embed and document the highest standards of inclusive design, for this approach to be carried forward throughout the development of projects.</del></p>

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PHV.3.67	D3 Paragraph <del>3.3.7</del> <b>3.3.1AB</b>	<p>Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the original design concept. To demonstrate this, <b>and to inform decision making, speed up the process and bring about better-quality development</b>, an <b>inclusive design statement</b> is required as part of the Design and Access Statement. The inclusive design statement should:</p> <ul style="list-style-type: none"> <li>• explain the design concept and illustrate how an inclusive design approach has been incorporated into this</li> <li>• <b>detail what best practice standards and design guidance documents have been applied in terms of inclusive design</b></li> <li>• show that the potential impacts of the proposal on people and communities who share a protected characteristic <b>and who will be affected by it</b> have been <del>identified and assessed</del> <b>considered</b></li> <li>• <del>highlight any historical contextual considerations</del></li> <li>• set out how <b>access and</b> inclusion will be maintained and managed, including fire evacuation procedures</li> </ul>

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		<ul style="list-style-type: none"> <li>• <del>detail how relevant best practice standards and design guidance have been applied, and highlight how relevant planning policy and legal requirements (including, where relevant, the Public Sector Equality Duty of the Equality Act 2010) have been responded to</del></li> <li>• detail engagement with relevant user groups, such as disabled or older people's organisations, <b>or other equality groups.</b></li> </ul>
PHV.3.68	D3 Paragraph <del>3.3.7A</del> <b>3.3.1AC</b>	<p><b>The detail contained in the Design and Access Statements, including the inclusive design statement, should be proportionate of the scale and type of development.</b> <del>The planning of inclusive design elements of development proposals and the drafting of inclusive design statements should be undertaken by or have input from a suitably qualified specialist with relevant experience in inclusive design, such as a member of the National Register of Access Consultants. Local authority access officers or inclusive design advisors should assist in the evaluation of development proposals and inclusive design statements in terms of inclusive design.</del></p>
PHV.3.69	D3	<p><b>The social factors that influence inclusion have a direct impact on well-being and are an important component in achieving more inclusive communities. Many factors that influence</b></p>

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	Paragraph 3.3.1AD	<b>potential barriers to inclusion can be mitigated by ensuring the involvement of local communities in the planning policies and decisions that will affect them.</b>
PHV.3.70	D3 Paragraph 3.3.2	Inclusive design creates spaces and places <b>that can facilitate social integration, enabling where people to can lead more interconnected lives, creating more inclusive communities. Development proposals should help to create inclusive neighbourhoods that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment. An inclusive neighbourhood approach will ensure that people are able to easily access services, facilities and amenities that are relevant to them and enable them to safely and easily move around by active travel modes through high-quality, people-focused spaces, while enjoying barrier-free access to surrounding areas and the wider city.</b>
PHV.3.71	D3 Paragraph 3.3.2A	Links to the wider neighbourhood <del>for all pedestrians</del> should be carefully considered, including networks of <b>legible, logical, safe and</b> navigable <del>safe</del> pedestrian routes, dropped kerbs and crossing points with associated tactile paving. <del>Links into the neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving.</del>
PHV.3.72	D3	Buildings should be designed and built to accommodate robust <b>emergency evacuation</b> procedures for all building users, including those who require level access. All building users

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	Paragraph 3.3.5	<p>should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up <b>mechanical devices or similar interventions that rely on manual handling</b> are not considered to be appropriate, for reasons of user dignity and independence. The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. <del>Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance.</del> <b>The fire evacuation lifts and associated provisions should be appropriately designed, constructed and include the necessary controls suitable for the purposes intended. See also D11 Fire safety.</b></p>
PHV.3.73	D3 Paragraph 3.3.6	<p>When dealing with <b>historic buildings and heritage assets</b>, careful consideration should be given to inclusive design, <del>in conjunction with their heritage value</del>, at an early stage. This is essential to securing successful schemes that will enable as many people as possible to access and enjoy the <b>historic environment assets</b> now and in the future, <del>whilst retaining their heritage value.</del></p>
PHV.3.74	D3 Paragraph <del>3.3.7</del>	<i>moved to 3.3.1AB</i>

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PHV.3.75	D3 Paragraph 3.3.8	<p>The Mayor will assist boroughs and other agencies in implementing an inclusive design approach <del>in all development proposals</del> by providing further guidance where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the <b>following</b> British Standards <del>documents BS8300 Volumes 1 and 2.:</del></p> <ul style="list-style-type: none"> <li>• <b>BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.</b></li> <li>• <b>BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.</b></li> </ul>
PHV.3.76	D4 <del>A</del>	<p><del>A — To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.</del></p>
PHV.3.77	D4 B	<p>B <del>Housing development</del> <del>New homes</del> should be of high quality design, and provide <del>have</del> adequately-sized rooms (see Table 3.1), with comfortable and functional <del>convenient</del></p>

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		<del>and efficient room</del> layouts, which are <del>functional</del> , fit for purpose and meet the <del>changing</del> needs of Londoners, <del>without differentiating between tenures. over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.</del>
PHV.3.78	D4 C	C Qualitative aspects of a development are key to ensuring successful sustainable housing <del>and should be fully considered in the design of any housing developments.</del> <b>Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.</b>
PHV.3.79	D4 <del>D</del>	<del>D</del> <i>Moved. See below.</i>
PHV.3.80	D4 E	E <del>Residential Housing</del> development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of <u>Policy D1B Part B London's form and characteristics</u> than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

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PHV.3.81	D4 G	G <del>Dwellings-Housing</del> should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) food <b>waste as well as residual waste.</b>
PHV.3.82	D4 <del>D</del> GA	<p><b>GA</b> Housing developments are required to meet the minimum standards below – <b>which <del>These standards</del></b> apply to all tenures and all residential accommodation that is self-contained.</p> <p>...</p> <p><b>Private outside space</b></p> <p>9) <del>A-Where there are no higher local standards in the borough development plan documents, a</del> minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, <b>and it must achieve a minimum depth and width of 1.5m.</b> This does not count towards the minimum Gross Internal Area space standards required in Table 3.1</p> <p><del>10)The minimum depth and width for all balconies and other private external spaces should be 1.5m.</del></p>

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PHV.3.83	D4  Table 3.1	<p><b>Table 3.1 - Minimum internal space standards for new dwellings<sup>25</sup></b></p> <p><b>Notes to Table 3.1</b></p> <p><b>Key</b></p> <p>b: bedrooms</p> <p>p: persons</p> <p>* Where a studio / one <b>single</b> bedroom one person <del>one bedspace (i.e. one single bedroom)</del> dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm, as shown bracketed.</p> <p>...</p> <p><b>GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included</b></p>

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		<b>without increasing the GIA, provided that all aspects of the space standard have been met.</b>
PHV.3.84	D4 Paragraph 3.4.2	The space standards are minimums which applicants are encouraged to exceed. <del>However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an efficient use of land.</del> The standards apply to all new self-contained dwellings of any tenure, <b>and consideration should be given to the elements that enable a home to become a comfortable place of retreat.</b> The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards. <b>Boroughs are, however, encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.</b>
PHV.3.85	D4 Paragraph 3.4.3	To address the impacts of the urban heat island effect and the fact that the majority of <del>residential housing</del> developments in London are <b>made up of</b> flats, a <b>minimum ceiling height</b> of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space.

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PHV.3.86	D4  Paragraphs 3.4.6 - 3.2.10	<p><i>(Reordering of paragraphs)</i></p> <p><b>3.4.5A</b> <del>3.4.10</del></p> <p><b>3.4.5B</b> <del>3.4.8</del></p> <p><b>3.4.5C</b> <del>3.4.9</del></p> <p><b>3.4.5D</b> <del>3.4.6</del></p> <p><b>3.4.5E</b> <del>3.4.7</del></p> <p><del>3.4.8</del> <i>Moved</i></p> <p><del>3.4.9</del> <i>Moved</i></p> <p><del>3.4.10</del> <i>Moved</i></p>
PHV.3.87	D4	Development should help create a more socially inclusive London. <b>Gated forms of development</b> that could realistically be provided as a public street are unacceptable and

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	Paragraph <del>3.4.9</del> <b>3.4.5C</b>	alternative means of security should be achieved through utilising the principles of good urban design <b>and inclusive design (see D3 Inclusive design).</b>
PHV.3.88	D4 Paragraph <del>3.4.6</del> <b>3.4.5D</b>	<b>Private <del>open-outside</del> space</b> should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared <b>outside amenity or garden</b> space is encouraged.
PHV.3.89	D4 Paragraph <del>3.4.7</del> <b>3.4.5E</b>	<b>Communal play space</b> <del>for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement</del> <b>should meet the requirements</b> of <u>Policy S4 Play and informal recreation</u> .
PHV.3.90	D4 Paragraph <del>3.4.11</del>	<i>(Paragraph 3.4.11 deleted and replace with new table 3.2)</i>  <del>The following qualitative aspects should be addressed in the design of residential</del>

Post Hearing Version: Change ref no	Policy/para/table/map	Minor / Further / Post session suggested change
		<p>developments:</p> <ul style="list-style-type: none"> <li>• <del>the built form, massing and height of the development is appropriate for the surrounding context, and alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in D6.E), particularly where a proposal is above the applicable density indicated in part C of <u>Policy D6 Optimising housing density</u></del></li> </ul>

Post Hearing Version: Change ref no	Policy/para/table/map	Minor / Further / Post session suggested change
		<ul style="list-style-type: none"> <li>• <del>the urban layout, including spaces between and around buildings forms a coherent pattern of streets and blocks</del></li> <li>• <del>public, communal and private open spaces relate well to each other and the wider neighbourhood</del></li> <li>• <del>the layout of the scheme maximises the extent of active frontages onto public facing sides and, where appropriate, surrounds uses that have inactive frontages with uses that have active frontages to engender street-based activity and provide a sense of safety</del></li> <li>• <del>the experience of arrival, via footpaths,</del></li> </ul>

<b>Post Hearing Version: Change ref no</b>	<b>Policy/para/table/map</b>	<b>Minor / Further / Post session suggested change</b>
		<p><del>entrances and shared circulation spaces is comfortable, accessible and fit for purpose</del></p> <ul style="list-style-type: none"> <li><del>• communal open spaces provide sufficient space, are easily accessed from all related dwellings and are designed to support an appropriate balance of informal social activity and play opportunities for various age groups</del></li> <li><del>• the private amenity space for each dwelling is usable and has a balance of openness and protection, appropriate for its outlook and orientation</del></li> <li><del>• outdoor spaces are located to be appreciated from inside, and internal spaces are able to take advantage of good weather and</del></li> </ul>

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		<p><del>designed to achieve ease of access to external spaces</del></p> <ul style="list-style-type: none"> <li><del>• blocks and floorplans are orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage</del></li> <li><del>• the dwellings and outside spaces are fit for purpose and comfortable</del></li> <li><del>• the dwellings and outside spaces are able to be easily adapted to meet the changing and diverse needs of different occupiers over their lifetimes</del></li> </ul>

<b>Post Hearing Version: Change ref no</b>	<b>Policy/para/table/map</b>	<b>Minor / Further / Post session suggested change</b>
		<ul style="list-style-type: none"> <li>• <del>window cleaning and other basic cleaning and maintenance activities can be carried out by residents easily</del></li> <li>• <del>the site layout, common parts, design of individual units and buildings, and orientation of rooms and windows provide privacy and adequate daylight for all residents, as well as clear and convenient routes with a feeling of safety</del></li> <li>• <del>the design or the layout and orientation helps reduce noise from common areas to individual dwellings</del></li> </ul>

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		<p><del>• the design of developments, and orientation and layout of individual dwellings and common spaces helps meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters</del></p> <p><del>• sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items</del></p> <p><del>• recycling and waste disposal facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services<sup>26</sup>.</del></p> <p><del><sup>26</sup> See also the London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties 2014. <a href="http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/">http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/</a></del></p>
PHV.3.91	D4	<b>Table 3.2 Qualitative design aspects to be addressed in housing developments</b>

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	<b>Table 3.2</b>	<i>(Inserted new Table 3.2)</i>
PHV.3.92	D4  <b>Table 3.2 i</b>	<b>The built form, massing and height of the development should be appropriate for the surrounding context, and it should be shown that alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in <del>D6-E 3.1B.24</del>), particularly where a proposal is above the applicable density indicated in part <del>C F</del> of <u>Policy <del>D6 Optimising density</del> D2 Delivering good design</u></b>
PHV.3.93	D4  <b>Table 3.2 ii</b>	<b>The layout of the scheme (including spaces between and around buildings) should:</b> <ul style="list-style-type: none"> <li>- <b>form a coherent, legible and navigable pattern of streets and blocks</b></li> <li>- <b>engender street based activity and provide a sense of safety</b></li> <li>- <b>maximise active frontages onto public facing sides of a development, where appropriate wrapping around inactive frontages</b></li> </ul>

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PHV.3.94	D4  Table 3.2 iii	<p><b>The site layout, orientation and design of individual dwellings and where applicable common spaces should:</b></p> <ul style="list-style-type: none"> <li>- provide privacy and adequate daylight for residents</li> <li>- be orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage</li> <li>- provide clear and convenient routes with a feeling of safety</li> <li>- help reduce noise from common areas to individual dwellings</li> <li>- help meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters</li> </ul>
PHV.3.95	D4  Table 3.2 iv	<p><b>Outside space</b></p> <p><b>Communal <del>open</del> outside amenity spaces</b></p> <ul style="list-style-type: none"> <li>• should: provide sufficient space to meet the requirements of the number of residents</li> <li>• be designed to be easily accessed from all related dwellings</li> </ul>

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		<ul style="list-style-type: none"> <li>• be located to be appreciated from the inside</li> <li>• be positioned to allow overlooking</li> <li>• be designed to support an appropriate balance of informal social activity and play opportunities for various age groups</li> </ul> <p>meet the changing and diverse needs of different occupiers</p>
PHV.3.96	D4 Table 3.2 v	Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation
PHV.3.97	D4 Table 3.2 vi	<p>The development should ensure that:</p> <ul style="list-style-type: none"> <li>-the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose</li> <li>- features are designed to allow maintenance activities such as window cleaning, to be undertaken with ease</li> <li>- sufficient levels of secure, covered and conveniently located externally accessible storage is provided for deliveries and other bulky items</li> </ul>

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		<p><b>- recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services.*</b></p> <p>* See also the London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties 2014. <a href="http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/">http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/</a></p>
PHV.3.98	D4 3.4.12	<p>Other components of housing design are also important to improving the attractiveness of new homes as well as the Mayor's wider objectives to improve the quality of Londoners' environment. The Mayor intends to produce a single guidance document that clearly sets out the standards which need to be met in order to implement Policy D4 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. <b>This will include guidance on daylight and sunlight standards.</b> The guidance will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.</p>
PHV.3.99	D5 A	<p>A To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:</p>

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		<p>1) at least 10 per cent of <del>new-build</del> dwellings <b>(which are created via works to which Part M volume 1 of the Building Regulations applies)</b> meet Building Regulation requirement M4(3) 'wheelchair user dwellings', <del>i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users</del></p> <p>2) all other <del>new-build</del> dwellings <b>(which are created via works to which Part M volume 1 of the Building Regulations applies)</b> meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.</p>
PHV.3.100	D5 3.5.1	<p>Many households in London <del>already</del> require <b>accessible or adapted housing</b> to lead dignified and independent lives<sup>27</sup>. <b>In addition, More</b> Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, <u>Policy D5 Accessible housing</u> should apply to all <del>new-build</del> dwellings <b>which are created via works to which Part M volume 1 of the Building Regulations applies<sup>27A</sup>, which, at the time of publication of this Plan generally limits the application of this policy to new build dwellings.</b></p> <p><del>27</del> <del>Source - English Housing Survey</del></p>

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		<p><b>27A</b> This is governed by the statutory instruments; No. 2214 Building and Buildings, England and Wales, and The Building Regulations 2010, <a href="http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf">http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf</a></p> <p>and No. 767 Building and Buildings, England and Wales The Building Regulations &amp;c. (Amendment) Regulations 2015 <a href="http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf">http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf</a>.</p>
PHV.3.101	D5 3.5.2	<p>Where any part of an <b>approach route</b> including the vertical circulation in the common parts of a block of flats is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of dwelling served should be applied, to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. <b>For residential disabled persons parking requirements- see Policy T6.1 Residential parking.</b></p>
PHV.3.102	D5 3.5.6	<p>In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and <b>only</b> in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy:</p>

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		<ul style="list-style-type: none"> <li>• Specific small-scale infill developments (see <a href="#">Policy H2A Small sites housing developments</a>)</li> <li>• Flats above existing shops or garages <del>stacked maisonettes where the potential for decked access to the lift is restricted</del></li> <li>• <b>Stacked maisonettes where the potential for decked access to lifts is restricted</b></li> <li>• <del>Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.</del></li> </ul>
PHV.3.103	D5 3.5.8	<p>M4(2) and M4(3) dwellings should be <b>secured via planning condition</b> to allow the Building Control body to check compliance of a development against the optional Building Regulations standards. Planning conditions should specify:</p> <ul style="list-style-type: none"> <li>• Number of dwellings per size typology (i.e. x no. of y bed units) which <del>required to meet M4(2)</del> <b>must comply with Part M4(2)</b></li> <li>• Number of dwellings per size typology (i.e. x no. of y bed units) which <del>are required to meet M4(3) wheelchair accessible standards</del> <b>must comply with Part M4(3)(2)(a) wheelchair adaptable standards.</b></li> </ul>

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		<ul style="list-style-type: none"> <li>Number of dwellings per size typology (i.e. x no. of y bed units) which <del>are required to meet M4(3) wheelchair adaptable standards</del> <b>must comply with Part M4(3)(2)(b) wheelchair accessible standards.</b></li> </ul>
PHV.3.104	D6	<p><del>Policy D6 Optimising housing density</del></p> <p><i>Moved and integrated into D1, D1A, D1B, and D2</i></p>
PHV.3.105	D7 AA	<p>Development Plans and development proposals should:</p> <p><b>AA Opportunities to create new public realm should be encouraged and explored where appropriate.</b></p>
PHV.3.106	D7 A	<p>A <del>E</del>nsure the public realm is <b>well-designed</b>, safe, accessible, inclusive, attractive, well-connected, <b>related to the local and historic context, and</b> easy to understand, <b>service</b> and maintain. <del>Landscape treatment, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting,</del></p>

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		street furniture and surfaces <b>materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.</b>
PHV.3.107	D7 B	B <b>M</b> aximise 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.
PHV.3.108	D7 C	C <b>B</b> e 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 <b>how people use the public realm, and</b> 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.

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PHV.3.109	D7 D	D <del>E</del> ensure both the movement function of ..... Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, <b>which should be regular, convenient and accessible.</b>
PHV.3.110	D7 E - G	E <del>E</del> ensure there is a mutually ... F <del>E</del> ensure buildings are ... G <del>E</del> ensure appropriate management ...
PHV.3.111	D7 H	H <del>H</del> incorporate green infrastructure <b>such as street trees and other vegetation</b> into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, <b>moderate surface and air temperature manage heat</b> and increase biodiversity.
PHV.3.112	D7 I	I <del>E</del> ensure that <b>appropriate</b> shade, <del>and</del> shelter, <del>and</del> <b>seating and where possible areas of direct sunlight</b> are provided, <b>with other microclimatic considerations, including temperature and wind, taken into account in order</b> <del>with appropriate types and amounts of seating</del> to encourage people to spend time in a place, <del>where appropriate.</del>

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PHV.3.113	D7 IA	<p><b>IA</b> <del>This should be done in conjunction with the removal of any unnecessary or dysfunctional</del> <b>Street</b> clutter, <b>including</b> <del>or</del> street furniture <b>that is poorly located, unsightly, in poor condition or without a clear function should be removed,</b> to ensure <del>that the function of the space and</del> pedestrian amenity is improved. <b>Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space.</b> Applications which seek to introduce unnecessary street furniture should <del>normally</del> be refused.</p>
PHV.3.114	D7 J	<p><b>J</b> <del>E</del> explore opportunities for innovative approaches to improving the public realm such as open street events <b>and Play Streets.</b></p>
PHV.3.115	D7 K	<p><b>K</b> <del>C</del> create an engaging public realm for people of all ages, with opportunities for <b>social activities,</b> formal and informal play and social <b>interaction activities</b> during the daytime, evening and at night.</p>
PHV.3.116	D7 L	<p><b>L</b> <del>E</del> ensure that <b>any</b> 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. <b>Parking should not obstruct pedestrian lines</b> <del>Pedestrian crossings should be regular, convenient and accessible.</del></p>

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PHV.3.117	D7 M	M <b>E</b> ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.
PHV.3.118	D7 Paragraph 3.7.1	The <b>public realm</b> includes all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London's waterways. Some internal or elevated spaces can also be considered as part of the public realm, such as <b>markets</b> , shopping malls, sky gardens, viewing platforms, museums or station concourses. Such forms of public realm are particularly relevant in areas of higher density.
PHV.3.119	D7 Paragraph 3.7.2	The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, the public realm, and the buildings that frame those spaces, should be <b>designed for people multi-functional</b> , attractive, accessible and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement. <b>Higher levels of comfort should be sought in places where people will wish to sit, play, relax, meet, and dwell outside compared to other parts of the public realm that are primarily used for movement.</b>

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PHV.3.120	D7 Paragraph 3.7.3	...A small proportion (less than eight per cent) of these have the primary purpose of moving large numbers of vehicles through them, while most are intended to be quiet residential streets used for play, recreation and local access. The remaining streets are places which function as key centres for leisure, shopping, <b>culture, social interaction</b> and accessing services and employment, such as high streets or public squares.
PHV.3.121	D7 Paragraph 3.7.4	The specific balance between the different functions of any one space, such as its place-based activities, <del>and</del> its function to facilitate movement <b>and its ability to accommodate different uses of the kerbside</b> , should be at the heart of how the space is designed and managed.
PHV.3.122	D7 Paragraph 3.7.6	...Public realm is <b>valuable for London's cultural activity</b> , providing a stage for informal and everyday culture and for organised cultural activity. The opportunity to incorporate these uses should be identified and facilitated through <b>community engagement</b> , careful design and good acoustic design. <b>Careful consideration is needed of the benefits of using the public realm for particular events and the impact of the events on the use and enjoyment of the space by the public.</b>

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PHV.3.123	D7 Paragraph 3.7.11	The provision of <b>accessible free drinking water</b> fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles.
PHV.3.124	D8	<del>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:</del>
PHV.3.125	D8 A	<p><b>Definition</b></p> <p>A Based on local context, Development Plans should define what is considered a tall building <b>for specific localities</b>, the height of which <b>will</b> <del>may</del> vary <b>between and within</b> different parts of London.</p>
PHV.3.126	D8 B	<p><del>Tall building</del> <b>Locations</b></p> <p>B <b>1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other</b></p>

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		<p><b>requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</b></p> <p><b>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</b></p> <p><b>3) Tall buildings should <b>only</b> be <b>developed in sustainable locations that are identified in Development Plans.</b> <del>part of a plan-led approach to changing or developing an area.</del></b></p> <p><del>By following the processes required in parts A, B and C of Policy D2 Delivering good design bBoroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan</del></p> <p><del>bBoroughs should identify any such locations 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 in these locations, taking account of:</del></p>

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		<p><del>1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)</del></p> <p><del>2) their potential contribution to new homes, economic growth and regeneration.</del></p> <p><del>3) the public transport accessibility connectivity of different locations to ensure any future tall building development is focused in areas that are well connected by public transport.</del></p>
PHV.3.127	D8 C 1	<p><b>Impacts</b></p> <p><del>C The impacts of a tall building can be visual, functional or environmental. All the following impacts three elements should be considered addressed within plan-making and in deciding</del> <b>Development proposals should address the following impacts:</b></p> <p>1) <del>V</del><b>v</b>visual impacts</p> <p>a) <del>T</del><b>t</b>he views of buildings from different distances: <del>need to be considered, including</del></p> <p>i <del>L</del><b>L</b>ong-range views ...</p>

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		<ul style="list-style-type: none"> <li>ii <del>M</del>mid-range views ...</li> <li>iii <del>H</del>immediate views from ...</li> <li>b) <del>W</del>whether part of a group ...</li> <li>c) <del>A</del>architectural quality ...</li> <li>d) <del>P</del>roposals should take ...</li> <li>e) <del>B</del>uildings in the setting of a World Heritage Site must preserve, <b>and not harm</b>, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it</li> <li>f) <del>B</del>uildings near the River Thames, particularly in the Thames Policy Area, should <b>protect and enhance the open quality of the river and the riverside public realm, including views, and</b> not contribute to a canyon effect along the river <del>which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river</del></li> <li>g) <del>B</del>uildings should not cause adverse reflected glare.</li> </ul>

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		<b>h) Buildings should be designed to minimise light pollution from internal and external lighting.</b>
PHV.3.128	D8 C 2	<p>2) <del>F</del>functional impact</p> <p>a) <del>T</del>the internal ...</p> <p>b) <del>B</del>buildings should ...</p> <p>c) <del>E</del>entrances, access ...</p> <p>d) <del>H</del>it must be ...</p> <p><del>e) Infrastructure improvements required as a result of the development should be delivered and phased appropriately (see also Policy D6 Optimising density)</del></p> <p>f) <del>J</del>jobs, services, ...</p> <p>g) <del>B</del>buildings, including ...</p>
PHV.3.129	D8 C 3	3) <del>E</del> environmental impact

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		<ul style="list-style-type: none"> <li>a) <del>W</del>wind, daylight, ...</li> <li>b) <del>A</del>air movement ...</li> <li>c) <del>N</del>oise created ...</li> </ul>
PHV.3.130	D8 C 4	<ul style="list-style-type: none"> <li>4) <del>C</del>umulative impacts <ul style="list-style-type: none"> <li>a) <del>T</del>he cumulative visual ...</li> </ul> </li> </ul>
PHV.3.131	D8 D	<p><b>Public access</b></p> <p>D <b>Free to enter P</b>ublicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where <b>they should normally be located at the top of the building to afford wider views across London.</b></p>
PHV.3.132	D8 Paragraph 3.8.1	<p>Whilst high density does not need to imply high rise, <b>tall buildings</b> can form part of a <del>strategic-plan-led</del> approach to <b>facilitating regeneration opportunities and meeting managing future growth, contributing to new homes and economic growth,</b> <del>regeneration and economic development goals,</del> particularly in order to make optimal use of the capacity</p>

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		<p>of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, <b>in the right place</b>, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design. The processes set out <b>below in <u>Policy D2 Delivering good design</u></b> will enable boroughs to identify <b>locations-areas</b> where tall buildings <del>can</del> play a positive role in shaping the character of an area.</p>
PHV.3.133	D8 Paragraph 3.8.1A	<p><b>Boroughs should determine and identify locations where tall buildings may be an appropriate form of development by undertaking the steps below:</b></p> <ol style="list-style-type: none"> <li><b>1) Based on the areas identified for growth as part of Policy D1, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place</b></li> <li><b>2) In these locations, determine the maximum height that could be acceptable</b></li> <li><b>3) Identify these locations and heights on maps in Development Plans.</b></li> </ol>

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PHV.3.134	D8 Paragraph 3.8.2	<p>Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. <b>Boroughs should define what is a ‘tall building’ for specific localities.</b> In large areas of extensive change, such as Opportunity Areas, <b>the threshold for what constitutes a definitions of tall buildings</b> should relate to the evolving <b>(not just the existing)</b> context. <b>This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London. For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:</b></p> <ul style="list-style-type: none"> <li><del>• it falls within the Thames Policy Area and is more than 25m in height</del></li> <li><del>• it falls anywhere else within the City of London and is more than 150m in height</del></li> <li><del>• it is more than 30m in height elsewhere in London.</del></li> </ul>
PHV.3.135	D8 Paragraph 3.8.2A	<p><b>The higher the building the greater the level of scrutiny that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in Part FD of Policy D2 Delivering good design</b></p>

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PHV.3.136	D8 Paragraph 3.8.7	Any <b>external lighting</b> for tall buildings should be <b>minimal</b> , energy efficient, and designed to minimise glare, light trespass, and sky glow, and should not negatively impact on <b>protected views, designated heritage assets and their setting, or</b> the amenity of nearby residents.
PHV.3.137	D9 A	A Boroughs, <del>particularly in inner London,</del> should establish policies to address the negative impacts of large-scale basement development beneath existing buildings, <b>where this is identified as an issue locally.</b>
PHV.3.138	D9 Paragraph 3.9.2 -3.9.1	<del>3.9.2</del> Moved to end of section <del>3.9.3</del> Moved to end of section
PHV.3.139	D9 3.9.4	The construction of basements can, <del>however,</del> cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments.
PHV.3.140	D9	The Mayor supports boroughs in <b>restricting large-scale basement excavations</b> under existing properties where this type of development is likely to cause unacceptable harm.

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	Paragraph 3.9.5	Local authorities are advised to consider the following issues, <b>including any cumulative impacts</b> , alongside other relevant local circumstances when developing their own policies for basement developments: local ground conditions; flood risk and drainage impacts; land and structural stability; protection of trees, landscape, and biodiversity; archaeology and heritage assets; neighbour amenity; air and light pollution; and the impacts of noise, vibration, dust and site waste. Where <b>particular and cumulative flood risk issues exist there is a known risk of flooding</b> , boroughs <b>may should</b> consider restricting the use of basements for non-habitable uses.
PHV.3.141	D9 Paragraph 3.9.2 3.9.5A	Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable. <del>Where basement developments cause particular harm, boroughs can consider introducing Article 4 Directions to require smaller scale proposals to obtain planning permission.</del>
PHV.3.142	D9 Paragraph 3.9.5AA	<b>Basement development (small or large) can also cause significant noise and vibration disturbance, through the reflection/focusing of ground-borne vibration originating from existing infrastructure, such as London Underground infrastructure, if this issue is not considered and managed effectively during its design and construction. Impact assessments prior to construction should consider the effects on the ground-borne</b>

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		<b>vibration environment and propose appropriate mitigation, especially for surrounding residents.</b>
PHV.3.143	D9 Paragraph <del>3.9.3</del> <b>3.9.5B</b>	The Mayor considers that <b>smaller-scale basement excavations</b> , where they are appropriately designed and constructed, can contribute to the efficient use of land, <b>and</b> <del>They can provide an affordable option for families to provide</del> extra living space without the costs of moving house, <del>although these developments rarely result in the provision of additional residential units to help meet London's housing need.</del> <b>In areas w</b> where basement developments <b>could</b> cause particular harm, boroughs can consider introducing <b>Article 4 Directions</b> to require smaller-scale proposals to obtain planning permission.
PHV.3.144	D10  A	A Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the <del>London Fire and Emergency Planning Authority</del> <b>London Fire Commissioner</b> , the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area <del>and</del> to support provision of necessary infrastructure to maintain a safe and secure environment <b>and reduce the fear of crime.</b>

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PHV.3.145	D10 B	B Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of <b>extreme weather</b> , fire, flood and related hazards.
PHV.3.146	D10 Paragraph 3.10.2	.... In particular they should incorporate appropriate <b>fire safety</b> solutions and represent best practice in fire safety planning in both design and management. The <del>London Fire and Emergency Planning Authority (LFEPA)</del> <b>London Fire Commissioner</b> should be consulted early in the design process to ensure major developments have fire safety solutions built-in.
PHV.3.147	D10 Paragraph 3.10.3	Measures to <b>design out crime</b> , including counter terrorism measures, should be integral to development proposals and considered early in the design process, <b>taking into account the principles contained in guidance such as the Secured by Design Scheme<sup>30A</sup> published by the Police. Further guidance is provided by Government on security design.</b> This will ensure <b>development proposals</b> they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective.  ...  <b>30A For further details see <a href="http://www.securedbydesign.com/">http://www.securedbydesign.com/</a></b>

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PHV.3.148	D10 Paragraph 3.10.4	<p><b>By drawing upon current Counter Terrorism principles, N</b>ew development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of <b>their detection</b> <del>detecting intrusion</del>, and delay/<b>disrupt their activity until an appropriate response can be deployed</b> <del>any attempts at disruption until a response can be activated</del>. Consideration should be given to <b>physical, personnel and electronic security</b> (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which <b>mitigate</b> <del>respond to</del> the potential level of risk whilst ensuring the quality of places is maximised.</p>
PHV.3.149	D11 A	<p>In the interests of fire safety and to ensure the safety of all building users, <b>all</b> development proposals, must achieve the highest standards of fire safety and ensure that they:</p> <p><b>1A) identify suitably positioned unobstructed outside space:</b></p> <p><b>a) for fire appliances to be positioned on</b></p>

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		<p style="text-align: center;"><b>b) appropriate for use as an evacuation assembly point</b></p> <p>1) are designed to incorporate appropriate features which reduce the risk to life <b>and of serious injury</b> in the event of a fire; <b>including appropriate fire alarm systems, passive and active fire safety measures</b></p> <p>2)....</p> <p>3) provide suitable and convenient means of escape, <b>and associated evacuation strategy</b> for all building users</p> <p>4) <del>adopt</del> <b>develop</b> a robust strategy for evacuation which <b>can be periodically updated and published, and which</b> all building users can have confidence in</p>
PHV.3.150	D11 B1	<p>All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party suitably qualified assessor.</p> <p>The statement should detail how the development proposal will function in terms of:</p> <p>1) the building's construction: methods, products and materials used, <b>including manufacturers details</b></p>

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		<p>2) the means of escape for all building users: <b>suitably designed</b> stair cores, escape for building users who are disabled or require level access, <del>and the associated management plan approach</del> <b>and associated evacuation strategy approach</b></p> <p><b>2A) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans</b></p> <p>3)</p> <p>4) how provision will be made within the <b>curtilage of the</b> site to enable fire appliances to gain access to the building</p> <p><b>4A) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.</b></p>
PHV.3.151	D11 Paragraph 3.11.2	The <b>subject matter of</b> fire safety <b>compliance</b> is covered by Part B of the Building Regulations. However to ensure that development proposals achieve the <b>highest standards of fire safety</b> , reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population

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		<del>as a whole. Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety.</del>
PHV.3.152	D11 Paragraph <b>3.11.2A</b>	<b>Applicants should demonstrate on a site plan that space has been identified for the appropriate positioning of fire appliances. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.</b>
PHV.3.153	D11 Paragraph <b>3.11.2B</b>	<b>Applicants should also show on a site plan appropriate evacuation assembly points. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.</b>
PHV.3.154	D11 Paragraph <b>3.11.2C</b>	<b>Developments, their floor layouts and cores need to be planned around issues of fire safety and a robust strategy for evacuation from the outset, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve</b>

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		<b>the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.</b>
PHV.3.155	D11 Paragraph <b>3.11.3A</b>	<b>The provision of stair cores which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.</b>
PHV.3.156	D11 Paragraph 3.11.4	<u>Policy D3 Inclusive design</u> requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. <del>Where</del> <b>In all developments where</b> lifts are installed, <u>Policy D3 Inclusive design</u> requires <b>as a minimum of-at least one lift per core (or more subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.</b> <del>, which incorporate suitable levels of fire resistance to elements of construction forming refuges, evacuation lift enclosures, and lobbies. Fire evacuation lifts and associated provisions should be appropriately designed, constructed and should include the necessary controls suitable for the purposes intended.</del>
PHV.3.157	D11	<b>Fire statements</b> should be submitted with all major development proposals. These should be produced by a third-party independent suitably-qualified assessor. This should be a

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	Paragraph 3.11.5	qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers <b>or suitably qualified and competent with the demonstrable experience to address the complexity of the design being proposed / built, which should be evidenced in the fire statement.</b> Planning departments <del>should</del> <b>could</b> work with and be assisted by suitably qualified and experienced officers within borough building control departments-and/or the London Fire Brigade, in the evaluation of these statements.
PHV.3.158	D11 Paragraph <del>3.11.5A6</del>	<b>Fire safety and security measures should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and <del>should not adversely impact on the</del> means of escape <del>nor prevent entry or access of the</del> fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.</b>
PHV.3.159	D11 Paragraph 3.11.7	<b>Refurbishment that requires planning permission will be subject to London Plan policy. Some refurbishment may not require planning permission; nevertheless, the Mayor expects steps to be taken to ensure all existing buildings are safe, taking account of the considerations set out in this Policy, as a matter of priority</b>

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PHV.3.160	D12 A	A The Agent of Change principle places the responsibility for mitigating impacts from existing noise <b>and other nuisance</b> -generating activities or uses on the proposed new noise-sensitive development.
PHV.3.161	D12 B	B Boroughs should ensure that <b>Development Plans and</b> planning decisions reflect the Agent of Change principle and take account of existing noise <b>and other nuisance</b> -generating uses in a sensitive manner when new development, <del>particularly residential,</del> is proposed nearby.
PHV.3.162	D12 <del>C</del>	<del>C</del> <i>Moved. See below</i>
PHV.3.163	D12 D	D Development should be designed to ensure that established noise <b>and other nuisance</b> -generating <del>venues uses</del> remain viable and can continue or grow without unreasonable restrictions being placed on them.
PHV.3.164	D12 E	E New noise <b>and other nuisance</b> -generating development, <del>such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues</del> proposed close to residential and other noise-sensitive <b>development uses</b> should put in place measures <del>such as soundproofing</del> to mitigate and manage any noise impacts for neighbouring residents and businesses.

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PHV.3.165	D12 <del>C</del> EA	<p><del>C</del> EA Development proposals should manage noise and other potential nuisances by:</p> <ol style="list-style-type: none"> <li>1) ensuring good <del>acoustic</del> design <del>to</del> mitigates and minimises existing and potential <del>nuisances impacts of noise</del> generated by existing uses <b>and activities</b> located in the area</li> <li>2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions <b>including ongoing and future management of mitigation measures</b> secured through planning obligations</li> <li>3) separating new noise-sensitive development where possible from existing noise-generating businesses <b>and uses</b> through distance, screening, internal layout, sound-proofing, <del>and</del> insulation and other acoustic design measures.</li> </ol>
PHV.3.166	D12 F	<p>F Boroughs should refuse development proposals that have not clearly demonstrated how noise <b>and other nuisances</b> will be mitigated and managed.</p>
PHV.3.167	D12 Paragraph 3.12.1	<p>For a long time, the responsibility for managing and <b>mitigating the impact of noise and other nuisances</b> on neighbouring residents and businesses has been placed on the business or activity making the noise <b>or other nuisance</b>, regardless of how long the <del>noise-generating</del> business or activity has been operating in the area. In many cases, this has led</p>

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		to newly-arrived residents complaining about noise <b>and other nuisances</b> from existing businesses <b>or activities</b> , sometimes forcing the businesses <b>or other activities</b> to close <del>down</del> .
PHV.3.168	D12 Paragraph 3.12.2	The <b>Agent of Change principle</b> places the responsibility for mitigating the impact of noise <b>and other nuisances</b> firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, <b>for example</b> , applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise <b>and other</b> impacts. This could include paying for soundproofing for the existing <del>noise-generating uses</del> , such as an <del>n-existing</del> music venue. The Agent of Change principle works both ways. <b>For example, †</b> if a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.
PHV.3.169	D12 Paragraph 3.12.3	The Agent of Change principle is included in the National Planning Policy Framework <del>at paragraph 123</del> and Planning Practice Guidance provides further information on how to mitigate the adverse impacts of noise <b>and other impacts such as air and light pollution</b> <sup>32</sup> .  ...

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		<sup>32</sup> NPPG, <a href="https://www.gov.uk/guidance/noise--2#contents">https://www.gov.uk/guidance/noise--2#contents</a> <a href="https://www.gov.uk/topic/planning-development/planning-officer-guidance">https://www.gov.uk/topic/planning-development/planning-officer-guidance</a>
PHV.3.170	D12 Paragraph <a href="#">3.12.3A</a> <a href="#">3.12.6A</a>	<p><b>The Agent of Change principle predominantly concerns the impacts of noise-generating uses and activities but other nuisances should be considered under this policy. Other nuisances include dust, odour, light and vibrations (see Policy SI1 Improving air quality and T7 Freight and servicing). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Policy E7 Industrial intensification, co-location and substitution, Part E (4)). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.</b></p>
PHV.3.171	D12 Paragraph 3.12.4	<p>Noise-generating <b>cultural venues</b> such as theatres, concert halls, pubs, <b>night-clubs</b> and <del>live music</del> <b>other venues that host live or electronic music</b> should be protected (see <a href="#">Policy HC5 Supporting London's culture and creative industries</a>). ...</p>
PHV.3.172	D12	<p><b>As well as cultural venues, the Agent of Change principle should be applied to all noise-generating uses and activities including schools, places of worship, sporting</b></p>

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	Paragraph <b>3.12.4A</b>	<b>venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.</b>
PHV.3.173	D12 Paragraph 3.12.5	Housing and other <b>noise-sensitive development</b> proposed near to an existing noise-generating use should include necessary acoustic design measures <b>for example, site layout, building orientation, uses and materials</b> . This will ensure new development has effective <del>sound insulation</del> <b>measures in place</b> to mitigate and minimise potential noise impacts or neighbour amenity issues. Mitigation measures should be explored at an early stage in the design process, with necessary and appropriate provisions secured through planning obligations.
PHV.3.174	D12 Paragraph <b>3.12.5A</b>	<b>Ongoing and longer-term management of mitigation measures should be considered, for example through a noise management plan. Policy T7 Deliveries, servicing and construction provides guidance on managing the impacts of freight, servicing and deliveries.</b>
PHV.3.175	D12 Paragraph <b>3.12.6A</b>	<i>moved to 3.12.3A</i>

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PHV.3.176	D12 Paragraph 3.12.7	<b>Noise and other impact assessments</b> accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the <b>noise particular</b> characteristics of existing uses can be properly captured and assessed. For example, <del>cultural venues</del> <b>some businesses and activities</b> can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in <b>noise</b> impact assessments to ensure a full and accurate assessment.
PHV.3.177	D12 Paragraph 3.12.8	Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale <b>and Policy SI1 Improving air quality which considers the impacts of existing air pollution. Further guidance</b> on managing and mitigating noise in <del>mixed-use</del> development <del>and town-centre development</del> is also provided in the Mayor's London Environment Strategy.
PHV.3.178	D13 A	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:  ...

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		<p>2) reflecting the Agent of Change principle <b>as set out in Policy D12.</b> <del>to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses</del></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 restrictions on <b>existing noise-generating uses development</b></p> <p>...</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, <del>or internal</del> layout, <b>orientation, uses and materials</b> – in preference to sole reliance on sound insulation</p>
PHV.3.179	D13  Paragraph 3.13.1	<p>The <b>management of noise</b> is about encouraging the right acoustic environment, <b>both internal and external</b>, in the right place at the right time. ... Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive <b>wildlife species, or parks and green spaces affected by traffic noise and pollution.</b> <b>Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure</b></p>

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		<b>effective management and mitigation measures are achieved in new development proposals.</b>
PHV.3.180	D13 Paragraph 3.13.2	The <b>Agent of Change Principle</b> places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses should not be unduly <del>impacted</del> <b>affected</b> by the introduction of new noise-sensitive uses. <b>For noise-generating uses regard should be had to not prejudicing their potential for intensification or expansion.</b>
PHV.3.181	D13 Paragraph 3.13.3	The management of noise also includes promoting <b>good acoustic design of the inside of buildings</b> . Section 5 of BS 8223:2014 provides guidance on how best to achieve this. <b>The Institute of Acoustics has produced advice Pro:PG Planning and Noise (May 2017) that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.</b>