

London Legacy Development Corporation Quality Review Panel

Report of Formal Review Meeting: LLDC Publication Stage Local Plan

Friday 20 June 2014, 10.00 – 13.00

Level 10, 1 Stratford Place, Montfichet Road, London E20 1EJ

Panel

Peter Studdert (chair)

Mark Brearley

Peter Stewart

Tom Holbrook

Planning authority and stakeholder attendees

Lynda Addison

LLDC Planning Committee

Anthony Hollingsworth

LLDC Planning Policy and Decisions

Kathryn Firth

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Eleanor Fawcett

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Deborah Denner

Fortismere Associates

1. Project name and site address

LLDC Planning Policies

2. Presenting team

Alexander Savine	LLDC Planning Policy and Decisions
Alice Leach	LLDC Planning Policy and Decisions
Gudrun Andrews	LLDC Planning Policy and Decisions
Lydia Sprake	LLDC Planning Policy and Decisions

3. LLDC introduction

In October 2013 Quality Review Panel reviewed a draft of the 'Local Plan Consultation Document', which subsequently receiving approval from the Legacy Corporation Board, and was the subject of a period of public consultation between 4 December 2013 and 7 January 2014. During this time a 'critical friend' group, including members of the QRP has met on two further occasions to support the LLDC in developing the Plan. Approval for the draft Publication Plan will be sought from the LLDC Board on 22 July. If approved, further consultation will take place in Summer 2014, followed by submission to the Secretary of State in Autumn 2014. This programme aims to achieve an adopted Local Plan by May 2015.

4. Quality Review Panel's views

Summary

In broad terms, the Quality Review Panel supports the Publication Stage Local Plan, and believes that this will support the LLDC in securing high quality development. There remains some scope for further improvements to be made, for example through additional illustrations and clearer wording of some policies. However, the panel is confident that these adjustments can be made within the programme, aiming for adoption of the plan in May 2015. The panel accepts that there is a difficult balance to be struck between making the document accessible to the public while at the same time ensuring that it is legally watertight in the key policy areas.

Viability

- The LLDC area has benefitted from a vast injection of public funds, in the region of £8 billion. The QRP believes the benefit of this in terms of uplift in land values should not entirely fall into the hands of private landowners, particularly in areas outside the Olympic Park.
- The panel therefore supports the aims of the Publication Stage Local Plan to ensure a return on this public investment, by securing high quality development and community benefits through the planning process.

- The panel feels that the Local Plan will support arguments about the density, height and liveability of developments being brought forward in the LLDC area.

Illustrations

- The illustrations included in the Publication Stage Local Plan are generally two dimensional, and the panel would encourage the LLDC to commission some three dimensional drawings.
- For example 'Z-mapping' of the whole Legacy Corporation area could illustrate area as it is now, as well as the extent of schemes with planning approval. This would be very useful, as at least 80% of the LLDC area is covered by existing permissions.
- Figure ground maps showing the area before, during and after the 2012 Olympics, already produced by the LLDC Design Team, could also help illustrate the Section 3 'Our Vision – What We Want to Achieve'.
- In the current draft Publication Stage Local Plan, case studies are used, and the QRP supports this as a succinct and powerful way of communicating the quality of development expected.

Local / Neighbourhood and District Centres

- The Proposals Map indicates areas where the LLDC will encourage development of Local / Neighbourhood and District Centres.
- In the cases of Hackney Wick and Pudding Mill Lane, masterplans have been commissioned by the LLDC to provide clear guidance as these new centres evolve.
- The QRP has reviewed both these masterplans, which are beginning to inform the Site Allocation Maps that provide more detailed planning guidance alongside the Proposals Map for the whole LLDC area.
- The LLDC is in a unique position as a planning authority with significant land ownership, and it also has the benefit of a strong Design Team that can support both LLDC developments and the Planning Policy and Decisions Team.
- The QRP would support the LLDC in commissioning masterplans for all of the proposed Local / Neighbourhood and District Centres, to set out strong spatial visions for these areas. This work should include Stratford High Street.

- However, the way in which masterplan principles are distilled into the Site Allocation maps needs further thought. For example, it is not clear what the difference is between 'nodes of activity' and 'street frontage'.
- Allocation maps should also communicate guidance about ground floor use, for example to indicate areas where there should be no residential accommodation at ground level.
- Diagrams showing movement networks, such as figure 26, would be clearer if they were shown on a map base with street names.
- The labelling of these diagrams also needs more thought – for example, it is not clear what is meant by 'key connections (on road) or (off road)'.
- It could also be helpful to have separate illustrations for the existing and proposed movement networks.

Infrastructure

- The Publication Stage Local Plan deals with infrastructure, primarily in terms of where there are requirements for example for new bridges, roads, railways, green infrastructure etc.
- The panel thinks that areas where existing infrastructure creates barriers and poor quality environments should be given greater emphasis in the Local Plan.
- For example, the negative impact of the A12 on the LLDC area should be addressed, together with a high level strategy for mitigating this.

Quality

- The Publication Stage Plan, together with documents such as the London Housing Design Guide provide clear guidance on achieving high quality residential development.
- There is a lack of similar guidance to inform the design of non-residential development, such as offices and retail.
- The panel would encourage the LLDC to strengthen the Local Plan with guidance on non-residential development.
- This would be particularly valuable in areas such as Hackney Wick and Pudding Mill Lane, where the Local Plan seeks to encourage commercial activity and work space.
- In the absence of clear guidance, there is a risk this will lead to the development of poor quality commercial and work space development that will just pay lip service to planning requirements.

- For example, design guidance on non-residential development could set out minimum floor to ceiling heights – to avoid policies on maximum building heights leading to poor quality office or retail units with low ceilings at ground level.

Building heights

- The Publication Stage Local Plan sets out guidance on the height of development in terms of height above ground level (rather than a number of storeys).
- The panel thinks that where guidance on height is provided, this should describe a range, rather than just a maximum height which would encourage developers to see the maximum as an entitlement in all cases.
- In any area, a variety of building heights is likely to be desirable, to allow developments to respond to particular site conditions, such as the width of urban blocks, solar orientation etc.
- Variety in building heights will also be needed to support a variety of housing types. For example, where the LLDC seeks to encourage family housing, four storey blocks could provide townhouses and maisonettes, whereas 6 storey blocks imply apartments.
- There is also a risk that developers will propose buildings with low floor to ceiling heights, to maximise the number of floors within a given building height. This could compromise the quality of accommodation, and should therefore be addressed alongside guidance on building height.

Tall buildings

- The panel supports the decision to include a section on tall buildings in the Local Plan, which builds on the *CABE/EH Guidance on Tall Buildings (2007)*.
- There seems to be a contradiction in Policy BN.10 which states that 'proposals for tall buildings will be considered acceptable where they reflect the scale and grain of their context' but also states that 'tall buildings are defined ... as those which are higher than a Sub Areas's prevailing height'.
- Points 3 and 11 of Policy BN.10 also seem to say the same thing, and could be conflated.

Key views

- The QRP thinks that the number of views identified should be reduced, their direction should be marked with arrows, and a table should be provided that clearly lists the purpose of each protected view.
- In general, only important views which the Plan seeks to protect, should be identified.

Next steps

- The Quality Review Panel trusts that the detailed comments provided above can be addressed by the LLDC, as the Publication Stage Local Plan is refined prior to its adoption.

