

Note of Technical seminar held on Wednesday 26th August 2015

Present

David Hogger – Inspector
Carmel Edwards – EiP Secretary
John Lett – Strategic Planning Manager (JL)
Jennifer Peters – Strategic Planning Manager (JP)
Celeste Giusti – Principal Strategic Planner (CG)
Peter Wright – Policy Manager, TfL (PW)

1 Introduction

- 1.1 The Inspector, David Hogger, opened the proceedings and introduced himself and Carmel Edwards the EiP Secretary, who would be assisting him through the examination process.
- 1.2 He then invited the representatives of the GLA to introduce themselves. **John Lett**, Strategic Planning Manager, welcomed Mr Hogger to City Hall and introduced his colleagues.
- 1.3 Mr Hogger briefly outlined the approach he would take to the examination, assessing the proposed alterations against the soundness test as set out in paragraph 182 of the NPPF, an approach adopted by previous inspectors. He reminded attendees that his main concern was the minor alterations and the suggested changes published by the Mayor on 21st August 2015. Anyone referring to unaltered policies would have to justify how they felt the alterations affected them.
- 1.4 Some of his questions had been addressed by the suggested changes, but he considered it helpful to retain them because it would provide the opportunity to the GLA to explain the changes at the hearings and for other participants to comment.
- 1.5 The GLA had confirmed, in a Note dated 21st August 2015, that the statutory requirements have been met.
- 1.6 The closing date for comments on his Draft matters had been the previous day. He would consider all comments before producing his Final matters by Tuesday 8th September. Any further statements must refer to these Final matters. The closing date was Tuesday 29th September.
- 1.7 He asked participants to take account of any technical evidence to be heard in the seminar, in clarifying key areas of disagreement. He did not want repetition at the hearings of what was presented this morning.

- 1.8 **Mr Hogger** referred to his guidance notes for further information, but asked for any questions on procedure.
- 1.9 **Richard Lee (Just Space)** raised the question of recordings and the possibility of web casting the sessions. Mr Hogger had no personal objection as long as everyone in the room was content and comfortable. He understood that the GLA were considering the issue and would release updated guidance soon. His guidance notes had been following the guidance from previous EiPs. [See Appendix 1 for Post-meeting note]

2 Housing standards

- 2.1 **Jennifer Peters** presented an overview and background. The aim of the seminar was to provide clarification of evidence and approach on specific issues raised by a number of consultation responses
- 2.2 The seminar would not cover all the MALP evidence which could be found on the GLA website, and would be debated as part of the EiP.
- 2.3 Evidence of need for access standards – **Jennifer Peters** presented for the GLA.
- 2.4 **JP** clarified that only one access standard can apply at once.
- 2.5 Viability evidence – **Jennifer Peters** presented for the GLA.
- 2.6 **JP** outlined the methodology which followed a similar approach to the 2015 London Plan viability assessment. Details of the work on viability could be found on the [GLA website](#). They were assuming policy compliant schemes.
- 2.7 **Brian Regan (LB Lewisham)** asked for a clarification on policy 5.2.
- 2.8 **JP** explained that one of the Mayor's suggested changes is to delete the minor alterations to Policy 5.2. The effect of this change is that energy policy reverts back to the 2015 London Plan. **Celeste Giusti (CG)** added that they were just deleting that element and would be providing further guidance. **John Lett (JL)** said that this would be in the Housing SPG, but the final version was not available yet. There was not yet a fixed timetable for this, it depended on the outcome of the EiP hearings. They would hope to publish the SPG by Feb/March 2016.
- 2.9 **Michael Bach (London Forum)** picked up on the term 'Nationally described' standards, and looked for clarification of his understanding that there was no legal requirement to apply them in London.
- 2.10 **John Lett** reminded him that it was the government's term, and applicable on a site by site basis. However he was conscious that the government saw the standards as something that should not be departed from.

- 2.11 **Russ Edwards (Pocket Living)** asked whether the impact of service charges had been factored into viability assessments. **JP** replied that guidance would be put in SPG for planning authorities to take account of this.
- 2.12 **Julia Park (Levitt Bernstein)** raised a number of issues. How much discretion did boroughs have on Category 3 and did they have discretion across tenure? Was there evidence on how many homes had actually been sold to wheelchair users? She also questioned the affordability to vulnerable groups of an additional cost.
- 2.13 **JP** responded for the GLA. Boroughs will be expected to reflect London Plan policy unless they have local evidence that suggests a different approach to access is required in their boroughs. The GLA would have a say through involvement with EiPs for Local Plans. They did not have figures for the number of wheelchair homes that have been sold to wheelchair users but greater monitoring of this is being considered. However, the poor marketing of units is not a reason for not building them, and more needed to be done on marketing. The largest cost was for fully accessible dwellings, and in practise would only apply to affordable housing.
- 2.14 **Robin Brown (Just Space)** asked for clarification on the use of the word 'people' in slide 'Need category 3'. **JP** confirmed that this should be 'household' throughout.

3 Parking standards

- 3.1 **John Lett** for the GLA presented an overview. He emphasised that this was not a major alteration, and it was responding to concerns from some boroughs relating to low PTAL areas.
- 3.2 He made reference to data that fed into the 2015 [Outer London Commission Report](#) on residential parking standards. **Mr Hogger** asked if this could be made available on the website.
- 3.3 **Peter Wright (TfL)** presented the evidence on high level impacts and modelling. It was based on best estimates, and did not include mitigation.
- 3.4 **Mr Hogger** referred to the minor reductions in public transport, walking and cycling, and asked where the correlation was between this and sustainable transport policy.
- 3.5 They had to balance a small but measurable downside against social sustainability. It dealt with some isolated communities. They considered that there was sufficient flexibility in their approach, and boroughs could respond appropriately. The main approach was still public transport, walking and cycling.

- 3.6 **Peter Eversden (London Forum)** asked whether the GLA felt that the increased cost and loss of land would affect affordable housing provision? **JL** pointed out that the modelling looking at land take showed a low dwellings equivalent so there would not be a big impact.
- 3.7 **Michael Bach (London Forum)** asked why it was considered of strategic importance, could it not be left to the boroughs? **JL** explained that London is different, there are complex challenges in terms of transport, which cross borough boundaries. It had to be seen as part of a wider picture, needed an element of strategy and a broad view, as well as local.
- 3.8 **Michael Bach** commented that they hadn't factored in the spread of controlled parking zones, which he considered would spread over the next 20 years. **PW** explained that TfL's modelling explicitly excluded all forms of mitigation, so CPZs would not have been included.
- 3.9 **Mr Hogger** asked if there was evidence he needed to see to justify what they said about greater strategic impact? **PW** – if an issue was decided locally it could nevertheless have a strategic impact. Although it was an assumption, there could be a cumulative impact.
- 3.10 **Jenny Bates (Friend of the Earth)** asked if they had looked in terms of EU law? She considered it contrary to other policies in the London Plan. **Mr Hogger** commented that he would expect to hear this sort of discussion at the hearings.
- 3.11 **PW** reminded the meeting that the EU ruling concerned specific pollution concentrations, not emissions generally. And the modelling as presented did not consider mitigation. And they were presenting without looking at mitigation. **JL** added that it had to be seen in terms of the overall approach, and although he recognised that it could raise some environmental concerns there were wider benefits.
- 3.12 **John Gillett (Mill Hill Neighbourhood Forum)** asked if they had accounted for business use, he hadn't seen anything on car ownership. **PW** confirmed that the modelling took all types of trips into account.
- 3.13 **Robin Brown (Just Space)** asked a fact check question to clarify the base year, he presumed the percentage changes were over the plan period? Why was it 2011 in some slides? It was confirmed that the 2011 was the baseline year for modelling, but that TfL have some data up to 2013.
- 3.14 **Michael Bach (London Forum)** asked for clarification that the parking standards were expressed as a range up to a maximum. Was the way it was applied locally wrong? **PW** cited the benefits such as extra space on the streets. **JL** referred Mr Bach to the Outer London Commission Report, para

- 4.4.10. The Mayor was trying to reflect local concerns, such as on the extent of on-street parking.
- 3.15 **Mr Hogger** asked where these local concerns were recorded – in the OLC report and in details of meetings on the OLC website.
- 3.16 **Peter Eversden (London Forum)** asked whether car clubs had been factored in to the modelling. **PW** reminded him that the modelling did not take mitigation factors into account and thus car clubs would not have been included in this. TfL was however firmly committed to car clubs as it was to other forms of mitigation.
- 3.17 **Jenny Bates (FoE)** commented that mitigation should be done.

4 Integrated Impact Assessment

- 4.1 **Celeste Giusti** for the GLA introduced the legal requirements behind the IIA, the IIA process and the IIA in the context of the minor alterations. The legal requirement for the HRA was also outlined.
- 4.2 **Jenny Bates (FoE)** asked whether the scoping took into account the April 2015 Supreme Court ruling on air quality.
- 4.3 At the time of the scoping the ruling hadn't been issued. Developments defined as small sites had to comply with Policy 7.4. **PW** also explained that the work was undertaken at a strategic level, the areas they were looking at did not have a high concentration of pollution. For the purposes of modelling they had to be strategic, it was impossible to know where developments would be.
- 4.4 **Michael Bach (London Forum)** challenged the assumption that there would be an improvement in amenity, if people could still choose to park on the road. He doubted this could be achieved. **JL** repeated that some groups felt strongly about this, and the Mayor was responding to concerns. A one size fits all approach was not appropriate. He cited para 6.42k of the parking Standards MALP document.
- 4.5 **Richard Lee (Just Space)** asked how far the alteration would impact on people's health, did the IIA show actual evidence or data on this? **CG** explained that there was no specific data on car parking and health. It was not the role of the IIA to produce quantifiable evidence, but to generally appraise the impacts. **JL** added that some of the information could be found in the IIA ([Section 3, p21](#)), but also offered to dig out more detail. It would be a challenge - it was only a small percentage change, even factored up over 20 years. **CG** added that the IIA guide questions for the Air Quality Objective ask whether the alteration will help to achieve national and international standards for air quality.

- 4.6 **Mr Hogger** asked for this information to be made available. It would go on the website, with the presentations from the seminar.
- 4.7 **Mr Hogger** thanked everyone for their participation, and thanked the GLA for their input, he had found the seminar useful. He closed the meeting at 1.20pm.

Appendix 1 - Post meeting note

Following discussions on recordings and filming of the EiP it has been decided to update GLA guidance on recording and filming EiPs. Section 35 of the Inspector's Guidance notes has now been updated accordingly.

35. The EiP will be recorded. Anyone wishing to purchase copies of the recordings should notify the EiP Secretary. ~~No video, sound recording or photography is permitted during the EiP.~~ The hearings scheduled for Wednesday 21st and Thursday 22nd October will also be streamed on the GLA's website.

Provided that it does not disrupt proceedings, anyone will be allowed to report, record and film proceedings including the use of digital and social media. The Inspector will advise people present at the start of each hearing that the proceedings may be recorded and/or filmed, and that anyone using social media during or after the end of the proceedings should do so responsibly.

If anyone wants to record or film the event on equipment larger than a smart phone, tablet, compact camera, or similar, especially if that is likely to involve moving around the venue to record or film from different angles, they should contact the EiP Secretary in advance to discuss arrangements.