

# London Assembly Planning Committee

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Boris Johnson  
Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

**Our ref:**  
**Date:** 22 June 2015

Dear Mayor Johnson,

## **Public consultation: Minor Alterations to the London Plan 2015 - Housing Standards and Parking Standards**

On 8 May 2015, Stewart Murray (Assistant Director, Planning) wrote to the Chair of the Assembly to invite comments on the Draft Minor Alterations to the London Plan – Housing Standards and Parking Standards.

The Chair of the Assembly subsequently asked me, as Chair of the Planning Committee, to ensure the Committee formally respond to the consultation on the Assembly's behalf.

Please find our comments below and I look forward to participating at the next stage, the Examination in Public, this autumn.

### **Parking standards**

The Committee recognises that the Mayor's proposals have been tabled in response to Government's pressure to ensure the London Plan is in conformity with the national requirement to remove maximum parking standards for residential development.

Each group on the Committee will be submitting its own response to the consultation.

The Committee, however, would welcome the Mayor providing further guidance on the considerations to be taken into account as set out in paragraph 6.42k, in terms of other

aspects of traffic management, housing design and layout and other provision of sustainable transport options.

### **Housing standards**

Since 2011 the London Plan has provided the basis for a range of housing standards that address the housing needs of Londoners and these are brought together in the Housing Supplementary Planning Guidance (SPG). This is a part of a manifesto pledge to ensure Londoners could enjoy adequate levels of space in their homes.

The Committee recognises that the Mayor's proposals have been formulated in response to the Government's review of housing standards.

It notes the close working between the Mayor and DCLG in developing new national standards, and supports the Mayor's attempts to get the best deal for London. The Committee would urge the Mayor to use every opportunity to press Government for higher standards in London in recognition of its unique position in terms of housing need and supply.

### **Housing Quality and Design Policy**

The Committee is strongly supportive of the Mayor's attempts to ensure ceiling heights exceed those standards set nationally. London's situation is different to the rest of the country. To address the unique heat island effect of London, and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5 metres for at least 75 per cent of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

The Committee welcomes the Mayor's efforts to ensure the national space standards reflect those in the current London Plan as closely as possible. The Committee would encourage you as Mayor to go further in the proposed revision of the London Plan. You should:

- Consider reinstating the requirement in Policy 3.36 which required developers to allow 10 square metres per extra bedspace/person in homes for more than six persons/bedspaces. This may have a negative impact on large families, especially multi-generational families. The Committee notes that this is contained in the revised SPG, but considers that the inclusion in policy is a stronger approach to ensuring standards are maintained for large homes.
- Consider making references to a toolkit relating to furniture standards, either in the supporting text or the SPG as a guide to ensuring room sizes are appropriate for their use and household type.
- Consider using the phrasing "strongly encourage" in policy and supporting text wherever the national standards fall below those currently used in the London Plan.

While unlikely, the Committee is concerned that, potentially, these measures may result in GLA funded units being delivered in smaller sizes than are currently the case. The Committee urges you to ensure space standards are delivered to the maximum in GLA funded schemes.

The Committee welcomes your work in terms of the London wide assessment of needs and viability. The Committee believes this is a robust justification for policy and means the boroughs need not replicate this work.

### **Housing Choice - Policy**

The Committee understands that these alterations relate to the application of the revised Building Regulations to London's new housing. These changes are practical, as the MALP brings the standards up-to-date with Government legislation.

They also provide clarity for developers, and set a reasonable level wheelchair accessible housing that will have less of a negative impact on the viability of housebuilding in London. As such they will benefit vulnerable groups, such as elderly people, the disabled and those with children requiring adaptable homes.

Members are concerned that London's new homes meet the new accessibility standards and recommend you implement a more detailed monitoring policy in terms of delivery by all tenures and home sizes.

Members would also request further clarity on the new requirement for lifts to be provided on buildings of four stories and below, especially in terms of how and when this may be applied, to ensure that this will not incentivise taller buildings or lead to high maintenance or service charges.

### **Climate change adaptation and Sustainable Design and Construction Standards**

The Committee supports the policy changes in general and, again, notes that the Mayor has endeavoured to adopt the most stringent standards possible for London within national guidance.

We would, however, request further clarity as to the impact of these amendments on wider environmental objectives and policies within the London Plan.

London policy guidance currently refers to Category 3 of the Code, which provides criteria on the environmental impact of and responsible sourcing of materials used in construction. This may undermine London's ability to achieve the highest standards of sustainable design and construction, as required by London Plan Policy 5.3

The Committee, however, is concerned that there may be a loss of policies that help London provide high quality, sustainable housing. For example, the abolition of the Code for Sustainable Homes means that London may lose policies if they do not fall within any other planning or building control standard, such as on daylighting, NOx from boilers unless it can be demonstrated that they would still be covered within the amended London Plan.

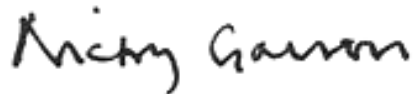
In terms of the Allowable Solutions approach to the reduction of carbon emissions, the Committee is concerned that any Government policy for offsite mitigation allows London to retain all of the contributions generated in London. The Committee urges the Mayor to lobby Government to ring fence funds that are generated in London to be spent in London.

You may consider whether the Mayor has a role in setting up, managing and delivering such arrangements through the GLA.

Finally, the Committee is concerned that developers will use Allowable Solutions as a method to avoid the difficulties involved in making developments sustainable. We would urge you to keep the implementation and impact of this approach under review and to lobby Government for changes in policy as necessary.

I look forward to receiving your views on the points contained in this letter.

Yours sincerely,

A handwritten signature in black ink that reads "Nicky Gavron". The signature is written in a cursive, slightly informal style.

Nicky Gavron AM

**Chair of the London Assembly Planning Committee**

Cc:

Stuart Murray, Assistant Director, Planning

John Lett, Strategic Planning Manager