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Date 22 June 2015

The person dealing with this matter is

Seb Salom

Boris Johnson
Mayor of London
(Housing & Parking Standards MALP)
Planning Department
Greater London Authority
FREEPOST LON15799
London SE1 2AA

Dear Mr Johnson,

Ref: Consultation GLA Housing Standards and Parking Standards Minor Alterations to the London Plan (MALP).

Thank you for the opportunity to comment on the Housing Standards and Parking Standards Minor Alterations to the London Plan (MALP) 2015. This is an officer level response, endorsed by the Cabinet Member for Regeneration and Growth, Councillor Linda Bailey.

As part of the Duty to Co-operate, we look forward to continuing to work with the Mayor to ensure that the London Plan brings positive benefits to London, including Bexley.

General Comments

It is noted that the MALP changes are in response to the Government's Housing Standards Review and the purpose is to bring the London Plan in line with National Housing Standards published in March 2015.

It is acknowledged that the proposed MALP Housing Standards must reflect the National Housing Standards because this approach is the only option enforceable. However, in practice the proposed Minor Alterations are very similar to those already in the London Plan and therefore the Council broadly supports the proposed changes to the London Plan.

National Planning Policy Guidance requires boroughs to provide evidence on the need for Housing Standards and also a requirement to consider the impact of the Standards on Local Plan viability. It is noted that the Mayor, through the MALP process, is intending to adopt the Standards through the London Plan, thus in turn saving London boroughs time and money in undertaking such evidence, until such a time as the Local Plan process will adopt the standards consecutively.

It is the Council's understanding that the London Plan forms a statutory part of Bexley's Development Plan and therefore the adoption of the Standards into the London Plan thereby implements the Standards in Bexley's planning framework.

The Council supports the Mayor's proposal for a more flexible approach to parking standards and welcomes the local determination of parking standards. The Council would wish to see a move towards parking 'provision' which takes into account prevailing car ownership levels based on dwelling size and local need.

Further Standard specific comments are given below.

Housing Standards

Bexley welcomes the Housing Standards Policy Transition Statement which sets out how existing London housing standards should be applied from October 2015 until such time that the Minor Alterations are adopted.

It is noted that the Nationally Described Space Standards the Mayor is proposing to adopt result in a small reduction from the London Plan space standard for larger two and three storey dwellings and minimum ceiling heights across the board. Although the reduction in standards may be a cause for some concern in terms of amenity, this will need to be balanced against the potential improvement in development viability in areas such as Bexley where values are significantly lower than other parts of London. It is also acknowledged that, following the publication of the Government's Standards, these are the only standards that can be applied to new housing.

It is noted that the approach in London Plan Policy 5.2 (Minimising Carbon Dioxide Emissions) is considered to be in line with the national approach and will help ensure continued investment in low carbon energy technologies in London. The re-calibration of the energy targets is not a change in the target, but a clarification.

Parking Standards

The Council supports the Mayor's proposal for a more flexible approach to parking standards since there are examples in residential developments in the borough where adherence to non-flexible parking standards has resulted in overspill parking problems. We welcome the proposed alteration that 'outer London boroughs should promote more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0-1). The wording should be changed to 'outer London boroughs **can** promote...' so that the alteration is less prescriptive and accounts for locations where more generous standards are not appropriate.

The Council asks that the Mayor extends the flexibility for outer London boroughs to areas with PTAL values of 0-2 (defined as 'very poor to poor'), since the genuine quality/connectivity of our public transport services are probably overstated by PTAL and are not as good as central/inner London with the same PTAL values. Bexley notes the reference in para 6.42k that 'account should be taken of the extent to which public transport might be provided in the future'; you will understand our reluctance to apply this where funding for future improvements has yet to be secured.

The Council welcomes the local determination of parking standards and would wish to see a move towards parking 'provision' which takes into account prevailing car ownership levels based on dwelling size and local need, as set out in DCLG's paper Residential Car Parking Research (2007). The Outer London Commission Reports in 2009 and 2012 supported flexibility which takes account of higher parking standards in neighbouring authorities that lie outside the London boundary; we would wish to factor this into our locally determined standards. Bexley also supports the role of non-allocated parking, which allows for more flexible and efficient use of the available

parking and limits indiscriminate parking overspill which can restrict access and be detrimental to the street scene.

In Bexley, particular parking problems are found in the borough's industrial estates, where public transport is more limited. This was reflected in our response to the consultation in April 2014 on your Further Alterations to the London Plan, where we asked that the flexibility for parking standards for offices be extended to all employment uses. Since the proposed alterations only apply to new residential development, can you identify if and when consideration may be given to a more flexible approach for employment uses?

I trust this information is helpful, should you have any questions or queries please do not hesitate to contact me. Officers would be willing to meet GLA colleagues to address the matters raised in this response.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Seb Salom', with a stylized, cursive script.

Seb Salom
Head of Strategic Planning and Growth
London Borough of Bexley