

Minor alterations to the London Plan (MALP) 2015

Housing Standards

Introduction

The MALP are proposed in response to the Government's new technical housing standards which remove the Code for Sustainable Homes, Lifetime Homes and local space standards and introduce new "optional" standards. The optional standards can be applied only where there is a case as supported by evidence. Accordingly the MALP also includes viability assessments and evidence of need.

RBG consultation response

RBG supports the Mayor's aim of retention of housing space standards and the introduction of the new optional standards replacing Lifetime Homes and Wheelchair homes. RBG supports the retention of the higher energy standard as an interim measure till 2016.

Policy 3.5 Quality and design of housing developments

RBG supports the insertion of requirements for accessibility and adaptability M4(2) and M4(3) which go some way towards compensating for the loss of Lifetime Homes and the Wheelchair Site Brief.

Table 3.3 Minimum space standards for new development

The minimum space standards in the Mayor's Housing SPG can no longer be applied. Therefore the MALP revises Table 3.3 to reflect the new nationally described space standards. The flat sizes remain the same as before although the house sizes are now reduced. This reduction is in line with the nationally described standards. The MALP strongly encourages, but does not require, a minimum ceiling height of 2.5m for at least 75% of the gross internal area. This aspiration exceeds the nationally described space standard of 2.3m. RBG supports the GLA approach.

Policy 3.8 Housing choice

The policy specifies that ninety per cent of new housing meets Building Regulation requirement M4(2) –which replaces Lifetime Homes; and ten per cent of new housing meets M4(3) – which is the new wheelchair standard.

Both these standards are “optional” and can be adopted if the evidence supports the new standards. If there is no supporting evidence the space standard reverts to M4(1). RBG supports this approach, which enables us to require the highest possible standards.

Paragraph 3.48A

To comply with M4(2) step free access must be provided. This will mean a lift going up to the first floor and above. This requirement may be subject to development-specific viability assessments and consideration should be given to on going maintenance costs. RBG supports this approach, as it allows for flexibility in the provision of lifts at the same time as ensuring compliance with the other requirements of M4(2).

Policy 5.2 Minimising carbon dioxide emissions policy

The Government’s new preferred maximum energy requirement is 19 per cent reduction beyond Part L 2013 (Code 4) equivalent. Policy 5.2 takes this into account, with the overall 35% reduction being made up of 19% from carbon savings on-site, firstly through demand reduction and the remaining 16% from low carbon infrastructure, either on-site or off-site. The targets in the London Plan will therefore continue to be applied in line with the energy hierarchy, across both residential and non-domestic development until the implementation of zero carbon policies in 2016. This approach is supported by RBG as it means that there is no reduction in carbon reduction targets up till 2016 when the London Plan and the Government will both require zero carbon development, at the same time as being in general compliance with the Ministerial Statement.

Policy 5.15 Water use and supplies

The Government’s new “optional” maximum for water usage is 110 litres per person per day. Policy 5.15 is amended in MALP to clarify that this is broken down into 105 litres for indoor use and 5 litres for outdoor use. RBG supports this approach.

Parking Standards

RBG notes that on 27 January 2015 the then Housing Minister Brandon Lewis wrote to the GLA stating that more parking spaces should be provided alongside new homes that families want and need, especially in areas of low

public transport accessibility. This prompted the Mayor to set up the Outer London Commission to discuss possible changes along these lines in the London Plan. The MALP brings forward a relaxation in parking standards in outer London. The Royal Borough is an Inner London Borough as set out in the London Plan so the new standards would not apply to RBG.

However, we wish to point out that public transport provision should be improved in poorly served areas so that people become less reliant on the private car, and that increasing parking spaces will not improve public transport accessibility. Conversely, it will without doubt encourage the use of the car, and therefore increase congestion, thus reducing the efficiency of buses on the road network. The air quality impacts are also negative.