

Boris Johnson, Mayor of London
(Housing Standards MALP)
(Parking Standards MALP)
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(sent by email to mayor@london.gov.uk)

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Dear Mr Johnson,

Consultation on the draft Minor Alterations to the London Plan (MALP)

London Borough of Islington Response

Thank you for the opportunity to respond to the consultation on the draft Minor Alterations to the London Plan (MALP). Our detailed comments on the minor alterations are set out below with reference to the relevant policy number.

Policy 3.5 Quality and Design of Housing Developments

We support the updates to Part C of this policy which set out that LDFs should incorporate requirements for accessibility/adaptability, minimum space standards and water efficiency. We also welcome the addition that room layouts should be functional and fit for purpose as this clarifies that the achievement of minimum space standards does not in and of itself ensure good quality housing design.

Policy 3.8 Housing Choice

We are broadly supportive of the changes proposed to this policy, and completely endorse the approach regarding evidence for Category 2 based on a universal design concept to meet the diverse and changing needs of the population rather than quantifying specific needs. While we support the 90% Category 2 and 10% Category 3 target set, we consider that it should also be stated that for smaller schemes of less than 10 units 100% should be built to Category 2. Of further concern is that there is now no requirement to ensure that Category 3 accessibility features are maintained throughout the life of the dwelling in the market sector as the Material Alterations requirement in ADM Volume 1 only requires that properties should be no worse than Category 1 after a Material Alteration.

We would question if there should be an acknowledgement that the adoption of the national standards will actually result in lesser standards than in the current version of the policy; the evidence base documents and the MALP seem to imply that the national standards are virtually the same as the current standards, i.e. business as usual, whereas in practice this is not the case and some important adaptability and accessibility features will be lost by the update. For example, the

requirement to facilitate the future installation of a through-the-floor lift is critical to the adaptability of the property and it has been stated that such a feature can be easily inserted; however our experience is that an appropriate location is far from easy to find and must be considered from the outset.

We would also welcome further clarity regarding the ability of boroughs to require Category 3 dwellings within the market tenure. Whilst existing policies (both our own and the Mayor's) require the provision of wheelchair accessible or adaptable dwellings across all tenures, there is some uncertainty if boroughs will be able to require this from 1st October 2015 when the national standards come into force. In taking forward the MALP, the Mayor seems best placed to recognise and challenge this issue; Islington endorses an approach that requires accessible housing provision to be across all sizes and tenures. We also recognise that a major problem is that there is currently no coherent accessible housing register and we would suggest that the Mayor supports boroughs to develop their own register and develops a platform for a London-wide facility.

Similarly, there is also no co-ordinated approach to marketing wheelchair accessible housing, and the larger size of a wheelchair accessible dwelling means that developers can command premium prices for these properties which may put them beyond the means of some disabled people. We would suggest that the Mayor endorse the use of S106 agreements to secure a commitment to market the units specifically as wheelchair units for a minimum time period, as some boroughs require already.

We welcome the clarification regarding lift provision to ensure step-free approaches; however there seems to be some confusion regarding viability and costs. The viability study commissioned in support of the MALP found that the new standards, including the requirement for step-free access to all dwellings, would result in no additional costs as a result of applying the new Category 2 standard in London. However, new paragraph 3.48A states that lift provision *'may be subject to development specific viability assessments and consideration should be given to ongoing maintenance costs'*. This seems to conflict with the conclusions of the viability study. It would seem to give applicants an opportunity to argue that a lift is not viable and therefore all dwellings in a scheme would default to Category 1, which would seriously undermine the achievement of the policy aim that 90% of London's future housing should be built to Category 2.

Within the minor alternations there does not appear to be anything to reconcile the car free policies with the transport needs of some elderly and disabled people. In Islington we consider alternative transport options (for example, storage and charging facilities for mobility scooters, accessible cycle parking, safe drop-off coupled with S106 contributions to accessible transport alternatives such as taxi-card) and it would be appreciated if the GLA would also address this issue.

Finally, it has come to our attention that there is a lack of clarity in the Building Regulations regarding the requirement for compliance with the new housing standards where the application is a result of a change of use. We would request the Mayor to seek clarification on this issue as it is unclear how the requirements of the London Plan will be met if Building Control are unable to discharge relevant conditions.

Policy 5.2 Minimising Carbon Dioxide Emissions

We support the updates to this policy, and in particular welcome the clarification in Part F that following the implementation of zero carbon development proposals will still be expected to follow

the energy hierarchy set out in Part A of the policy. We also support the clear direction in Part F that when considering options for Allowable Solutions priority should be given to delivery firstly in the local area and secondly within Greater London. We welcome the commitment in paragraph 5.20 to actively encourage development proposals to achieve the highest reasonable level of on-site carbon dioxide emissions reductions, and the new text in paragraph 5.23 which sets out the range of considerations to be taken into account in determining the reasonable on-site reduction. We fully support the clear priority afforded to onsite reduction and local investment in the updates in new paragraphs 5.23A and 5.23B.

Policy 6.13 Parking

Given that the Mayor has been directed by government to make these alterations, we welcome the specificity of the alterations to Part C relating to decision making. The specific reference to outer London and areas of PTAL 0-1 will ensure that boroughs where this does not apply still have the clear support of the Mayor, through the London Plan, to retain a more restrictive approach, which we consider to be entirely appropriate for Inner London. These comments also apply to the proposed alteration to Part E, which addresses plan preparation.

Islington would reiterate its opposition to any future alteration to the approach as set out in the existing London Plan Policy 6.13 or any future intervention that would prevent boroughs from carrying on with their own policies, including a 'zero parking' or 'car free' policy, which Islington has successfully implemented since 2011. Retaining "car free" policy is critical if we are to continue to deliver high levels of housing growth in the borough.

Should you have any questions or wish to discuss Islington's response to the MALP further please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sakiba Gurda'.

Sakiba Gurda
Planning Policy Team Manager

