

Consultation Draft - Minor Alterations to the London Plan 2015 -

Response from the Royal Borough of Kingston

Table of proposed changes and RBK response:

Proposed Minor Alterations to the London Plan	RBK Response
Housing Standards	
<p>Table 3.3 Minimum Space Standards</p> <p>Proposed reduction in minimum ceiling heights</p>	<p>This Council objects to the proposed minimum ceiling height reduction from 2.5m to 2.3m, and urges the Mayor to maintain the 2.5m minimum.</p> <p>As the notes in Table 3.3 point out, a ceiling height of 2.5m is strongly encouraged in order to address the unique urban heat island effect of London and to ensure that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.</p> <p>Generous ceiling heights allow for natural ventilation where heat has the potential to escape more easily. If a lower ceiling height is allowed, residents/developers may resort to more energy intensive ways to cool their properties. This would be bad for carbon emissions and potentially have a negative impact on the visual amenity of the built environment. It would be better therefore if minimum ceiling heights were maintained at 2.5m in order to maintain a sustainable, high quality level of housing in London.</p>
<p>Table 3.3 Minimum Space Standards</p> <p>Minimum Built in Storage Requirements</p>	<p>We support the identification of minimum built-in storage space requirements, which are additional to the living space Gross Internal Areas.</p>
<p>Policy 3.8 Housing Choice</p> <p>Clause B(c) It is proposed that 90 per cent rather than all new housing is now required to meet Building Regulation requirement M4 (2) accessible and adaptable dwellings.</p>	<p>Recent changes to the Building Regulations provide planning authorities with the option to introduce access requirements for new dwellings. The Mayor has opted to introduce a requirement in respect of accessible and adaptable dwellings (Building Regs M4(2)) and wheelchair user dwellings (Building Regs M4(3)). Embedding the requirement in policy means that the requirement can be imposed as a planning condition.</p> <p>The accessible and adaptable dwellings policy clause replaces the Lifetime Homes Standards, and requires step free access to new residential dwellings, which this Borough supports. However, unlike the Lifetime Homes Standards the clause applies to 90% of new dwellings and not all. We understand that applying the standard to 90% rather than to all dwellings, reflects the viability</p>

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	<p>issues that some developments may experience incorporating access via a lift where at grade access is not possible, which could render some developments unviable. However, we are concerned that offering a special viability circumstances get out opportunity may lead to a high proportion of schemes coming forward without step free access seeking to argue special viability circumstances. We urge the Mayor to revert to this requirement applying to all schemes with step free access issues.</p>
<p>Policy 3.8 Housing Choice</p> <p>Clause B(d) and Supporting text 3.49A</p> <p>Boroughs should specifically assess the level of need for wheelchair accessible dwellings and identify this in their LDF policies.</p>	<p>This Council supports the update in Policy 3.8 B(d) that incorporates the Building Regulations optional requirement to make ten per cent of new dwellings either wheelchair accessible or easily adaptable for wheelchair users. This approach accords with current Kingston Core Strategy policy.</p> <p>It is noted that the draft Minor Alterations supporting text suggests that boroughs should specifically assess the level of need for wheelchair accessible dwellings, and identify this in their LDF policies. The Council does not currently undertake such an assessment. All boroughs will have a different potential method to gather this information, and we request that the Mayor gives due consideration to how this information can best be obtained in a consistent and reliable manner without burdensome resource implications and inconsistencies in data collection. This Borough could potentially use its Choice Based Lettings website to gather the information.</p>
<p>Policy 5.2 Minimising Carbon Dioxide Emissions</p> <p>New standards</p>	<p>The amendments to Policy 5.2 reflect updated Building Regulations Part L 2013 standards and are broadly in line with current RBK Core Strategy targets for Major development, and do not fundamentally change policy requirements. Like the London Plan, this Borough's policy will be bound by new Part L Building Regulations due to be adopted in 2016.</p> <p>This Council's Sustainable Design and Construction Policy (DM1) was based on the Code for Sustainable Homes, but the withdrawal of the Code earlier this year meant that part of the Policy no longer applies, and the Council has adopted revised standards for domestic development as set out below. These standards are in line with the standards set out in the revised London Plan Policy 5.2.</p> <p>The RBK standards are as follows: For non major domestic developments:</p> <ul style="list-style-type: none"> - 19% emissions reduction from the Building Regulations 2013 Part L target emission rate.

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	<p>For major domestic developments:</p> <ul style="list-style-type: none"> - 35% emissions reduction from the Building Regulations 2013 Part L target emission rate. <p>RBK continue to use BREEAM target rating emissions reduction targets for Major non-domestic developments.</p>
<p>Policy 5.15 Water Use and Supplies</p> <p>New standards</p>	<p>The changes to London Plan Policy 5.15 are equivalent to amended RBK Policy requirements following the withdrawal of the Code for Sustainable Homes following the DCLG ministerial statement earlier this year. The Borough will continue to apply standards consistent with the London Plan for water use and supplies in all new development.</p> <p>The RBK standards are as follows: For all domestic developments:</p> <ul style="list-style-type: none"> - Water consumption lower than or equal to 105 litres / person / day.
Parking Standards	
<p>Policy 6.13, Parking</p> <p>Clause E(e) Promote more generous parking standards for housing development in areas of low PTAL</p> <p>Proposed definition of low public transport accessibility as PTAL 0-1</p>	<p>The principal of more generous residential development parking standards in areas of low Public Transport Accessibility Levels is welcomed by this Council, However, we have concerns with the proposed definition of low PTAL.</p> <p>The draft Policy 6.13 and supporting text makes reference to areas of outer London with low public transport accessibility (generally PTALs 0-1) where there is higher car dependency and pressures for on-street parking. The supporting text goes on to state that in these areas, and also some limited areas within PTAL 2, there should be flexibility for boroughs to promote more generous standards for housing development.</p> <p>This Council is of the opinion that while the general thrust of this guidance is sound, the stated PTAL figures should be revised to make reference to areas with PTAL levels 0-3. This change would give outer London boroughs the flexibility they need to develop their own residential parking standards across areas of poor accessibility. It would provide greater recognition of the relative isolation experienced in many areas of outer London (across the PTAL range 0-3) where public transport services are generally limited in both their frequency and destination giving little choice and flexibility to potential users. As a result the majority of people have to rely on the use of the car as the primary mode of travel.</p> <p>This position is borne out by statistics for this Borough.</p>

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	<p>Approximately 75% of Royal Borough of Kingston is classified as PTAL 0-3 (a high relative proportion), and as a consequence Kingston significantly exceeds the London average for private car use for travel to work journeys - 42% compared to 26.7%.</p> <p>As demonstrated by the Kingston PTAL map (attached), it is only in those areas of PTAL 4 and above where local residents genuinely enjoy good levels of connectivity to the transport network. For example in PTAL 4 areas residents are within an easy walk distance to a train station or bus interchange etc offering a frequent service and good choice of destinations. These areas are also mostly within walking distance of a town centre with a good range of shops and other local facilities. These considerations, and others, mean that residents in areas of PTAL 4 and above are able to live without relying on the need for regular access to a car. Conversely those people in areas of PTAL 0-3 are generally much more reliant on the private car.</p> <p>An amendment to the policy and text to cover this wider PTAL range (0-3) would reflect the discussion which took place at the parking standards evidence gathering meeting conducted between TfL and RBK (held at RBK offices in February this year) and also the meeting of the Outer London Commission (held at Croydon Town Hall in March) concerning parking related matters. These meetings discussed the extent and nature of possible plan alterations, in particular the introduction of greater flexibility for parking standards in outer London.</p> <p>In conclusion, the increased flexibility being introduced within this Policy and supporting text is generally welcomed by this Council. However, it is considered that the approach should be extended to allow authorities to adopt a more flexible approach in areas up to PTAL 3, rather than the 0-1 and occasionally 2 proposed in the draft policy.</p>
<p>Policy 6.13, Parking</p> <p>Clause E(e)</p> <p>Boroughs should promote more generous parking standards..... taking into account current and projected</p>	<p>This Council welcomes this proposed change.</p> <p>The greater flexibility afforded to residential parking standards would recognise and help relieve the significant pressures for on-street parking that currently exist across many Outer London areas. The situation can be aggravated by the limited on-street parking controls currently in place, and the sometimes limited scope for the introduction of CPZs or other measures to adequately control parking within the foreseeable future. CPZ extensions have to be the subject of public consultation with the result that there is no guarantee that any will actually be approved. While they can be considered in some circumstances, they cannot be relied upon to</p>

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pressures for on-street parking	provide a solution. The introduction of any other on street parking restrictions have to be considered carefully against a number of factors such as ensuring adequate resources for policing.
Paragraph 4 and Policy 6.13 and Table 6.2 Maximum and minimum parking standards. Policy 6.13 and Table 6.2 continue to refer to maximums.	<p>Paragraph 4 of the introductory note refers to the abolition of maximum parking standards. However, Policy 6.13 and Table 6.2 continue to refer to maximum residential parking standards. Whilst the amended wording in the policy encourages outer London boroughs to promote more generous standards, it does not explicitly state that minimum levels can be set. While the new supporting text states that in low PTAL areas boroughs should consider revised standards which could include minima, it is our view that the opportunity for boroughs to set minimum standards needs to be set out clearly in the policy.</p> <p>Maximum standards are not always appropriate for an outer London borough where PTAL levels are generally low. Maximum standards in residential development in outer London can sometimes result in an impact on surrounding on-street parking with a negative impact on residential amenity and highway safety. Greater flexibility should therefore be introduced to allow boroughs to set their own minimum requirements where appropriate, for example in areas with parking stress and poor public transport accessibility.</p> <p>In conclusion, while the new supporting text states that in low PTAL areas boroughs should consider revised standards which could include minima, it is our view that the opportunity for boroughs to set minimum standards needs to be set out within the policy itself.</p>