



Boris Johnson  
Mayor of London  
GLA City Hall  
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London SE1 2BR

11 June 2015

Dear Mr Johnson

**RESPONSE TO THE DRAFT MINOR ALTERATIONS TO THE LONDON PLAN (MALP):  
HOUSING STANDARDS AND PARKING STANDARDS**

Thankyou for this opportunity to respond to the public consultation on the draft Minor Alterations to the London Plan (MALP). Our detailed comments on individual MALP alterations are included in Annex 1 attached.

**Summary of our response to the 'Housing Standards'**

We are pleased to see that the altered policies and supporting text has been strengthened and updated to support the Government's aims. We support the proposed alterations.

**Summary of our response to the 'Parking Standards'**

We note the alterations, and the findings of the accompanying Integrated Impact Assessment (IIA). We are concerned to note the potential negative environmental impacts arising from applying more generous parking standards. We will continue to work with the Mayor and others to identify ways of mitigating those impacts, which will require careful monitoring. We recommend minor changes to explanatory text in the Parking MALP to reinforce other policies of the London Plan. Our Annexe 1 refers.

If you have any queries please contact the co-ordinator of our response, Stephen Walker, Principal Officer (Planning and Sustainable Development), London Team, Environment Agency, Tel: 07557 205536, or e-mail: [steve.walker@environment-agency.gov.uk](mailto:steve.walker@environment-agency.gov.uk).

Yours sincerely

A handwritten signature in black ink that reads "Charlotte Wood".

Charlotte Wood  
Environment Planning and Engagement Manager



## ANNEX 1: The draft Minor Alterations to the London Plan (MALP), May 2015: Environment Agency Response

Our responses are grouped below as they apply respectively to the proposed alterations on 'Housing Standards', and to 'Parking Standards'. We have not commented on alterations on which we have no views, or that are beyond our remit.

MALP HOUSING STANDARDS	
MALP policy / text	EA Response
<b>Policy 5.15 (B) Water use and supplies</b>  <b>Supporting para. 5.61</b>  <b>Integrated impact Assessment (IIA)</b>	<p><b>Support.</b> The alteration clarifies how the existing policy's water efficiency target of 105 litres per person per day for residential development in London, is compatible with the new 'optional requirement' in Part G of the Building Regulations 2015. The renewed emphasis on water efficiency will help build resilience to climate change.</p> <p><b>Support.</b> It renews the justification for having high water efficiency targets in London, and supports the detailed guidance on water efficiency in the Mayor's adopted Sustainable Design and Construction SPG, 2014. We welcome the proposed references to both a 'fittings-based approach', and to the emerging 'Water Label'.</p> <p><b>We are pleased to note the findings of the IIA</b> (<i>April 2015, Amec</i>), Section 5, that the proposed alterations are supported on the basis of both need and viability.</p>
<b>Policy 5.2 Minimising Carbon Dioxide Emissions</b>  <b>Supporting paras. 5.16 – 5.23B</b>	<p><b>Support.</b> These updates renew the Mayor's commitment to promoting development which meets energy efficiency targets and help build resilience to climate change.</p> <p><b>Support.</b> In providing practical guidance for developers in meeting the national zero carbon requirements, including Allowable Solutions, the alterations, if implemented, will help build resilience to climate change.</p>

MALP PARKING STANDARDS	
MALP policy / text	EA Response
<b>Policy 6.13 Parking</b>  <b>Supporting paras. 6.42i – 6.42k</b>  <b>Integrated impact Assessment (IIA)</b>	<p><b>Noted.</b> The alterations have been prompted by the flexible approach to car parking advocated in the National Planning Policy Framework (NPPF). However we have concerns about the environmental implications.</p> <p><b>Noted.</b></p> <p><b>Concerns.</b> We note that the The IIA (<i>April 2015, Amec</i>), finds that '...there will be minor negative impacts on the environment...', and that, increased off-street parking would compete with other land take eg. open space. (Table 4.1, Sustainability Appraisal, and Summary at para. 4.13 refer). The IIA Conclusions (para.6.3) go on to state that these negative impacts could be <i>partially mitigated (EA emphasis)</i> through the implementation of wider London Plan policies.</p> <p>Consequently, we are concerned that the promotion of more generous parking standards, if widely taken up, would cumulatively challenge the implementation of:</p> <ul style="list-style-type: none"> <li>Other London Plan policies eg. 2.8, 5.1, 5.2, 5.9, 5.10, 5.13, 7.1, 7.14, 7.18, and 7.19</li> </ul> <p>Mayoral Strategies including, Climate Change Adaptation, Climate Change and Mitigation, and Air Quality.</p> <p>We will continue to work with the Mayor and with the London Boroughs to help identify ways of mitigating the likely negative environmental impacts negative environmental impacts , which will require careful monitoring. Notwithstanding, we recommend adding safeguarding explanatory text as follows;</p> <p><b>We recommend:</b></p> <ol style="list-style-type: none"> <li>1) Review the London Plan's Annual Monitoring Report, Key Performance Indicators (KPI's) to ensure they remain effective in testing the implementation of London Plan policies, and the impacts of the Parking Standards MALP. In addition to the KPIs which the IIA recommends monitoring (Section 5, para. 5.2), we recommend review against: KPI 3 -Minimise Loss of Open Space; KPI 20 - Reduce carbon dioxide emissions through new development; and KPI 22 - Increase in urban greening.</li> <li>2) Add explanatory text to paragraph 6.42k, or new paragraph, along the lines of; 'In deciding whether or not more generous parking standards are to be applied,...<i>Consideration should also be given to the impacts on: surface-water run-off and the risks of flooding; pollution to water and air, and; the provision of amenity green space, in line with London Plan policies</i>'.</li> </ol>

