

**Draft Minor Alterations to the London Plan – Housing Standards Consultation**  
**London First response**  
**22nd June 2015**

**General comments**

London First is a business membership organisation with the mission to make London the best city in the world in which to do business. We represent the capital's leading employers in key sectors such as financial and business services, property, transport, ICT, creative industries, hospitality and retail. Our membership also includes higher education institutions and further education colleges.

We welcome the opportunity to respond to this consultation on the draft Minor Alterations to the London Plan (MALP).

London First continues to support the aims of the London Plan to improve the standards for the quality and design of housing including to ensure that it meets the needs of a changing population and are built to the highest environmental standards.

We acknowledge the need to amend London Plan policy and the housing standards in Table 3.3 to reflect the recently adopted national standards.

**Specific Comments**

**Policy 3.5 Quality and Design of Housing Developments**

A footnote refers to the 2015 Building Regulations Part M4 (2 and 3) accessibility and adaptability requirements. These requirements should be reflected in the Housing SPG design guidance.

**Table 3.3**

We welcome recognition that smaller one bed units of 37 sq.m are acceptable reflecting the need and demand for smaller units of this size. The provision of such units will contribute towards a sustainable mix of homes in new developments across London.

**Policy 3.8**

As set out within National Planning Practice Guidance (NPPG) website local planning authorities must have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing local plans. We request that policy 3.8d is updated such that the policy is in accordance the NPPG which states that "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling". The draft text should be amended to include specific wording of this statement within the policy itself. Otherwise policy 3.8 would fail to be in accordance with Government planning practice guidance.

**Paragraph 3.48**

The reference to Building Regulation M4 (3) should reiterate that the requirement is for 10% of housing to be to be either wheelchair accessible or wheelchair adaptable.

**Paragraph 3.48a**

Welcome recognition of the need to consider financial viability of the overall development in applying the requirements of Building Regulation M4 (2) on step free access for all buildings particularly for buildings of 4 storeys or less. In addition we also welcome the recognition of the need for consideration of impact that this requirement could have on the viability on maintenance costs for building owners and residents.

#### **Paragraph 3.49a**

In line with our comments on policy 3.8, reference to the NPPG requirement for Local Plan policies for wheelchair accessible homes to be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, should be made within policy 3.8 itself and not the supporting text. The second sentence of this paragraph should be amended to acknowledge that policy 3.8 reflects the NPPG stating that "As set out in policy 3.8d The Planning Practice guidance...".

#### **Policy 5.2 Minimising Carbon Dioxide Emissions**

We have significant concerns regarding the amendments to policy 5.2 which goes beyond Building Regulations guidance and national planning policy.

We strongly object to the proposals to introduce minimum requirements for reductions in carbon emissions over and above the 2013 Building Regulations for domestic and non-domestic buildings, in particular, the requirement for 50% improvement on 2013 Building Regulations for non-domestic buildings. The technical feasibility and financial implications of these proposed changes have not been properly tested or substantiated within the MALP consultation document nor the evidence base documents, notable, the locational and financial factors affecting the ability of individual developments to achieve this in various locations across London have not been fully considered. For example, in order to achieve these target emission levels, new development would be required to deliver community/district heating systems such as CHP. It may be more viable/feasible for a development in a central London location to achieve these levels compared to an outer London location. In addition, some developments may be more readily able to connect to existing energy/heat networks to enable them to achieve these standards.

As currently drafted, this policy goes over and above national guidance and planning policy, is onerous and not justified by a robust evidence base. We therefore consider that the amendments to policy 5.2 should not be pursued within the MALP but delayed until further technical feasibility testing and robust financial viability studies have been undertaken to demonstrate that these requirements will not have are both realistic and acceptable from a viability and practical perspective.

From experience, exceptions under Part E have not yet been accepted by the GLA and thus the requirement to achieve the London Plan CO2 emission reduction standards has, in some instances, added on significant financial burden to development schemes. Further detailed clarity on the mechanisms to achieve compliance with the requirements of policy 5.2 through part E should be provided in advance of 'allowable solutions'/zero carbon offsetting mechanisms commencing in 2016.

Notwithstanding the above, we welcome the proposed addition, in principle, of part F of this policy, in particular, the hierarchical approach to encouraging minimising carbon reduction on site and introduction of provisions for 'Allowable Solutions' measures. This provides the necessary flexibility towards achieving Zero Carbon development.

We suggest that policy should include a provision requiring Boroughs to establish local funds or identify low carbon infrastructure projects to enable Allowable Solutions to which developments may contribute.

#### **Paragraph 5.20**

We welcome the change in wording of this paragraph to “actively encourage” proposals to achieve the highest reasonable level of on-site CO2 reduction, this provides greater flexibility to developments in seeking to achieve CO2 emission reductions through a combination of on and offsite mechanisms.

#### **Para 5.23**

Wording in brackets ‘but not cost alone’ should be removed, it is clear from the text already that other issues will be considered alongside viability.

#### **Para 5.23a**

This paragraph provides the first and only reference to a minimum on site compliance level for zero carbon developments. This has not been substantiated through the draft MALP nor the evidence base documents. The ‘active encouragement’ of developments to achieve the highest reasonable levels of on-site CO2 reductions should also apply to zero carbon developments. The wording of para 5.23a should therefore be amended to read “under zero carbon proposals, *the Mayor will actively encourage proposals to achieve the highest reasonable level of on-site carbon emissions reductions*, with the remaining regulated carbon dioxide emissions from a development being offset through allowable solutions”.

**Draft Minor Alterations to the London Plan – Parking Consultation**  
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We strongly support the proposed “more flexible approach” to car parking standards in areas of low transport accessibility.

**Policy 6.13 Parking**

We welcome, in principle, the recognition of the need for a more flexible approach to residential car parking standards in areas of low PTAL in outer London, which is important to ensure that sufficient car parking is provided in new residential developments where public transport services do not meet residents day to day travel needs due to frequency or orientation. This flexibility is also needed in order to reduce pressure for on street parking. However, the flexibility should be extended to all areas of PTAL 0-2, since it will be at the discretion of the Local Planning Authority who will set out the appropriate car parking standards in the Local Plan having regard to relevant factors set out in the draft amendments to the Plan and paragraph 39 of the NPPF.

**Paragraph 6.42j**

In light of the comments above, this paragraph should be amended to read “It is recognised that in in outer London, a more flexible approach for applications within areas of PTAL 0-2 is necessary, in locations where the orientation or levels ..... parking design”.