

Jinder Ubhi

From: Gino Seguna
Sent: 22 June 2015 12:09
To: Jinder Ubhi
Cc: Julie Hill
Subject: FW: Housing Standards MALP

From: Dan Jestico [<mailto:DJestico@hiltonmoran.com>]
Sent: 22 June 2015 11:37
To: Mayor
Subject: Housing Standards MALP

To Whom it May Concern,

Please find below our responses to the proposed revisions to the London Plan, relating to the Housing Standards Review and other incoming standards.

Paragraph 5: GLA has stated that the Minor Alterations will be adopted in early 2016 and released a transitional statement relating to developments submitted for planning between October 2015 and this time. No guidance has been given on how applications should be treated prior to October 2015.

Paragraphs 3.37 and Policy 5.3: The HSR stated that "local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings." Are the Mayor's SPG documents relating to both Housing and Sustainable Design and Construction at odds with this statement? The SPGs clearly require additional technical standards relating to the performance of new dwellings and we are concerned the implications of the HSR have not been fully considered by the GLA.

Policy 5.2 B: This policy requires new domestic developments to achieve a 35% reduction in CO2 emissions prior to the introduction of zero carbon standards in 2016. After this date, new homes will be expected to achieve an on-site reduction in emissions of 19% on-site, with the remaining emissions abated through Allowable Solutions. However, the government have stated that small sites (fewer than 10 units) will be exempt from the Allowable Solutions payments. Although developments of this size fall outside the remit of GLA referable schemes, many London boroughs adopt London Plan standards in their planning policies, regardless of size. For these small sites, the shift from a 35% CO2 reduction prior to 2016 to a 19% reduction after 2016 means a drop in standards. It is important that the GLA considers the implications of this, as it is not discussed in the consultation.

Policy 5.2 F: This requires developers to deliver Allowable Solutions measures in the local area, or within Greater London if this is not possible, and the targeted CO2 reductions cannot be made through on-site means alone. As Allowable Solutions will be a national scheme, enforced through Building Control, we are concerned that this policy is non-compliant with the Governments intentions for achieving zero carbon through the use of Allowable Solutions, and is not a matter to be addressed through the planning system.

In addition, the following comments are made with regard to the feasibility and viability assessment on the non-domestic 50% target, undertaken by Hoare Lea, David Lock and G+T.

The study is based on assessing the impact of a proposed 50% reduction over Part L 2013, rather than finding the most cost effective level of CO2 emissions reduction. Other emissions targets should have been analysed for the purposes of this study to assess how higher or lower targets impact on feasibility and viability.

The analysis of district heat network CO2 factors highlights a worrying performance gap between proposed and actual CO2 factors. Further study is required on this, given the GLA's appetite for district energy networks.

I trust these responses are of interest. Please let me know if you require any further information.

Yours sincerely,

Dan.

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Head Of Research & Development



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