

## **MINOR ALTERATIONS TO THE LONDON PLAN 2015:**

### **JUST SPACE SUBMISSION**

Just Space is a community-led London wide network of voluntary & community groups helping one another at the grass-roots level to participate in the planning of London to ensure that their voices are heard on crucial issues of social justice and economic and environmental sustainability.

### HOUSING STANDARDS

Just Space supports a continuation of the principle referred to as one of the Mayor's priorities in the Introductory Note, para 1, to the Housing Standards MALP Consultation Draft. That is, to secure housing quality and design improvements, with homes meeting changing needs, and the implementation of the highest environmental standards. It is this approach that should inform and determine the approach and detail of alterations to the London Plan.

Indeed, as revealed through the Further Alterations to the London Plan and the Inspector's Report, London's unprecedented growth in population, together with the unknown ability of the Plan to successfully accommodate this growth, have made the justification for such an approach more compelling than ever. It is one that is essential to enable the Mayor to fulfil his legal obligations and meet his planning objectives, particularly in the achievement of sustainable development. That there should be any proposed reduction in standards is quite contrary to the general direction of travel, especially when these standards can be accomplished. A reduction in standards would set a compromising precedent for the promised early review of the London Plan.

Just Space recognises the unfortunate policy situation and the consequent harm to the proper planning of London that would follow if standards are not explicitly incorporated into the Development Plan, so that only basic building regulations can apply. To remedy this, as a start, the Policy Transitional Statement should cover all the present standards currently being revisited in the draft MALP. Additional technical requirements exceeding the minimum standards should be set within the Plan and not relegated to the Housing SPG.

Just Space looks to the London Plan continuing "to be seen as the expression of national policy for London tailored to meet local circumstances and to respond to the opportunities to achieve sustainable development here" (London Plan 2015 para 0.14). Therefore, the alterations should reflect the distinctive conditions and pressures evident in London and make the case for a distinct London approach to all standards rather than the few, such as ceiling heights, residential lifts and carbon dioxide reduction/energy efficiency, that are identified in the draft MALP. Furthermore, the principles informing these distinctive London standards should be

clearly articulated within the Policy Box and not relegated to the supporting text or Supplementary Planning Guidance.

Policy requirement, rather than “strong encouragement” or similar phrasing, is essential to secure clear, consistent and appropriate standards in development and certainty in the planning process. This will lead to development outcomes that are predictable and not as the Integrated Impact Assessment (IIA) has concluded that there will be “unknown effects” on the regeneration of London from the draft MALP.

Policy wording should not limit the ability or scope for boroughs, Mayoral Development corporations and Neighbourhood Forums to adopt standards that are locally justified, evidenced and viability tested.

Of particular concern to Just Space is the conclusion reached by the IIA that MALP’s likely effect on Air quality is “unknown” and is dependent on the technology used in developments. This is in a context of the recognised seriousness of air pollution throughout London and the recent pronouncement by the Supreme Court on the need to have a clear ‘roadmap’ for achieving compliance with national and European legislation to tackle ‘exceedance’. The alterations should maximise the ability of local authorities through the Planning & Energy Act 2008 to set energy standards exceeding those of the building regulations with the objective of development contributing to the resolution of the air pollution issue.

## PARKING STANDARDS

The proposed new Policy 6.13Ee, whereby outer London boroughs “should promote more generous standards...” is inappropriately deterministic and prescriptive for a strategic plan. It lacks consistency with the preceding Policy 6.13Ed which sets out the environmental factors that need to be taken into account, if an outer London borough chooses to allow more generous parking standards (for offices). These are necessary factors in order to secure the proper planning of London and the achievement of sustainable development.

Central to Parking Policy standards and implementation is the Public Transport Accessibility Levels (PTALs) measure. Just Space is concerned at the proposed repositioning of London Plan para 6.43, which explains the functional relationship of PTALs with land use planning, after the proposed insertion of new paragraphs to para 6.42, coupled with the deletion of “detailed and accurate” from the Glossary definition. These alterations signal that PTAL is diminishing in significance and sensitivity.

The Integrated Impact Assessment (IIA) for MALP reveals trends that are likely to result which are contrary to the general direction that London through its Plan should be progressing. Namely, that there will be additional car journeys and less walking and cycling to an uncertain extent with minor negative effects on, among other

matters, health & wellbeing, flood risk, climate change adaptation & mitigation and air quality.

It is pertinent to note that this may be an under reporting of the impact. During the scrutinising of the Further Alterations to the London Plan (FALP), the policy change to allow a more 'flexible approach' to be taken with respect to car parking in Outer London was assessed by the FALP IIA.

The conclusion was that it would have a 'minor negative effect' on air quality, being likely to encourage travel by private petrol & diesel vehicles and that, in turn, traffic emissions will increase (p46). This was duly reported.

When further investigation was made it was found that Appendix D of the FALP IIA - with its Table D1 Key Challenges for Health and Wellbeing in London - derived from a report 'Fair London, Healthy London?' which had a fuller assessment on the transport policy changes.. It concluded that 'It is not clear that the changes to the above policies are wholly supportive of health and wellbeing. Indeed, there may be **adverse effects** on health'. MALP's IIA omits to drill down to the same level of detail and does not reveal the adverse impacts that the proposals in the draft MALP would be likely to generate.

Further on air quality is the need to review the implications of the recent Supreme Court case. This found public bodies need policies and procedures that will meet EU standards on air quality in a shorter time period and new policies should be produced by the end of the year. However, the alterations to the parking standards would seem to head in the opposite direction - they will lead to more cars, emissions will rise and air quality worsen, thereby increasing the time period before compliance with the EU standards is achieved.

In a nutshell, the alterations imply a relaxation of sustainable transport targets when what is really needed is alterations that improve the availability and accessibility of public transport in outer London.

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