

Boris Johnson MP, Mayor of London
Housing Standards MALP
FREEPOST LON15799
GLA City Hall, post point 18
The Queen's Walk
LONDON SE1 2AA

15 May 2015

Dear Mayor of London,

RE: Bromley Council response to the Minor Alterations to the London Plan

Please see the attached Appendix 1 which sets out the London Borough of Bromley's response to the Minor Alterations to the London Plan (March 2015).

As you will note, our main area for comment is with regard to the parking standards, however we also note the alterations as set out in the Housing Standards consultation document in relation to the following policies;

- Policy 3.5 Quality and design of housing developments (including Table 3.3 Minimum space standards for new development)
- Policy 3.8 Housing choice
- Policy 5.2 Minimising carbon dioxide emissions
- Policy 5.15 Water use and supplies
- Policy 5.3 Sustainable design and construction
- Policy 7.1 Lifetime neighbourhoods

We will be testing the assumptions and standards for these policy areas as part of the Local Plan process and setting out local policies on these matters where relevant.

We thank you for considering our submission and look forward to seeing the resultant alterations included within the London Plan.

Yours Sincerely

Appendix 1

Housing Standards

The alterations to the housing design and housing choice policies including the amendments to the minimum space standards Table 3.3 to bring the standards in line with the national guidance are noted as are the updates and amendments to the carbon reduction and water usage policies.

The Council note the requirement at Policy 3.5 (c) for LDFs to incorporate requirements for accessibility and adaptability, minimum space standards that generally conform with including those set out in Table 3.3, and water efficiency.

As part of the viability assessment of the emerging Local Plan, Bromley will be looking to test the assumptions on a range of development typologies to ensure policies are achievable at the local level. We note the practical approach to Allowable Solutions for carbon reduction and will be investigating local projects and ways of securing any off-site payments.

Parking Standards

We note the publication of the draft Minor Alterations to the London Plan on 11 May 2015 and welcome the start of the relaxation on parking standards in areas of specifically outer London where parking provision is necessary for the mobility of a significant proportion of residents. However, the whilst to overall direction of the alterations is welcomed, the specific details and extent of the relaxation implicit in the alteration requires further amendment to meet the specific and varied needs of the Outer London Boroughs including Bromley .

The principle outlined in paragraph 6.13e that *outer London boroughs should promote more generous standards for housing development in areas with low public transport accessibility*, is to be welcomed this should go beyond the proposal to allow greater parking in PTALs 0-1 (assumed to refer to both PTALS 1a and 1b) and be extended to PTALs 2 and 3. Specifically that, *Boroughs should consider revised standards (which could include minima) and permitting higher levels of provision*, than allowed for under the existing London Plan standards, is welcomed, however we would like to seek clarity on how far this flexibility extends.

We also welcome the reduction in the purported accuracy of PTALS with the removal of the words 'detailed and accurate', beginning to recognise the misleadingly figurers PTALs can give in relation to radial routes and access to more rural areas of the Borough. Whilst the MALP makes some recognition of the inaccuracies and 'crude' (minutes of OLC sub regional meeting Croydon 10.03.15 Minutes) nature of PTALS with regards to *orientation or levels of public transport mean that a development is particularly dependent on car travel*. We would therefore support the usage of an alternative measure of an area's transport opportunities to PTALS for example Access to Opportunity rating. We therefore look forward to the further advice of the draft Housing SPG and forthcoming TfL guidance on parking and expect these to reflect the concerns expressed about the need for greater parking to be provided at residential developments in Outer London Boroughs.

Paragraph 6.42k is of particular concern. Giving consideration to *public transport might be provided in the future* creates the potential for significant and detrimental under-provision of parking. Given the long-term and at times uncertain nature of public transport investment we feel that it would be irresponsible to base parking provision for new homes on potential public transport investment. If the provision did not materialise then developments would be built with detrimentally low levels of parking with residents in the surrounding road and residents of the development forced to suffer from the effects of short-sighted decision making for many years to come. We also believe that the promotion of additional CPZs to mitigate against the effects of the additional parking resulting from developments in car dependant areas would have one of two effects, either to move the parking problem to the first available road beyond the CPZ as has occurred at locations around the Borough or unfairly limit the mobility options of residents of new developments in areas where a car is a necessity for a number of journeys.

Therefore whilst supportive of the direction of the MALP in allowing Boroughs to permit greater parking in areas where required, we would ask that this flexibility is extended to all areas of PTAL 3 in outer London. Also that decisions do not have to be predicated on potential future public transport provision unless already under construction with completion likely before the completion of the development.