

Draft London Plan Early Minor Alterations – Mayor’s response to comments at Assembly & Functional Bodies consultation stage

ref	Who commented	Summary of comments December 2011	Mayoral response February 2012
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Summary

The consultation ran from 7th November to 20th December 2011 and generated 15 responses.

1	Transport for London	Welcome alterations, particularly greater provision for cycle parking for office staff in B1 premises and health centres in Class D1. Also welcome greater provision for visitors in C use classes and inclusion of student accommodation and other land uses within the standards. TfL are continuing work on future cycle parking demand and would welcome further alterations when this research is completed.	Noted. Support welcomed.
2	LB Bromley	Note alterations are minor in nature. Para. 3.71: will need to be clarity about process for agreeing provision of affordable housing in schemes, particularly about how boroughs can require developers to agree a contract prior to progressing a scheme. Para 6.35: “demonstrated” is insufficiently strong to deal with developers unwilling to meet standards; suggest proposed new wording should be omitted, or prefaced by “in exceptional circumstances”	This is more appropriately done through supplementary guidance. Consideration will be given to providing further advice in this way. “Demonstrated” places an onus on developer to show that it is not practicable to locate cycle parking within development. It is considered this approach is clearer in practical terms, and strikes an appropriate balance. Any reference to exceptional circumstances will be unhelpful without some guidance on what might constitute grounds for an exception, which will introduce unnecessary complexity.
3	City of London Corporation	Consider that the relationship between the London Plan and the National Planning Policy Framework could be dealt with by a statement outside of a formal alteration.	At a time of uncertainty the Mayor considers it is helpful to make a statement with a degree of formality, allowing anyone wishing to take issue with his view that the London Plan is generally in accordance with

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		<p>Support need to review affordable housing policies in the light of the new affordable housing product.</p> <p>Para 3.44: proposed amendment to this paragraph should state that the affordable rent model will be applied to new applicants for social housing.</p> <p>Para. 3.45: penultimate sentence should read “social, affordable rent, and intermediate housing (Policy 3.11)”.</p> <p>Para 3.47: Mayor should consider the need to update or supplement the 2009 SHMA to look specifically at the need for affordable rent and the impact that its provision could have in meeting identified housing needs within London.</p> <p>Para 3.58: delete specific reference to affordable rented housing</p> <p>Policy 3.10: support alteration to definition of affordable housing to include affordable rent</p> <p>Para 3.61: omit the term “private” before “registered providers”.</p>	<p>the draft National Planning Policy Framework to do so.</p> <p>Support welcomed</p> <p>This level of detail on a matter going rather beyond planning considerations is more appropriate for the London Housing Strategy rather than the London Plan.</p> <p>Agreed. Change proposed to be made.</p> <p>Government policy – stated in PPS3 – is that affordable rented housing will meet the same housing needs hitherto addressed by social housing. The Mayor is using his housing investment powers to agree delivery programmes with registered providers to ensure that the new product does meet the range of housing needs across London in the 2011-2015 investment round. The Mayor intends to update the 2009 SHMA in due course.</p> <p>Disagree. Given the recent introduction of affordable rented housing it is considered appropriate to make a specific reference to it.</p> <p>Support welcomed</p> <p>While technically correct, use of the word “private” is strictly unnecessary, so propose to delete.</p>

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		<p>Policy 3.11: Policy should allow more flexibility in terms of the level of affordable rent provided where development is subsidy free. Boroughs with very high rental levels should be able to regulate the amount of affordable rented units developed on a particular site in those cases where HCA funding is not being sought</p> <p>Policy 3.12: no objection to proposed new paragraph C, but should include a cross-reference to Policy 2.11 (dealing with strategically important clusters of economic activity).</p> <p>Generally welcome proposals for cycle parking</p> <p>Should be specific cycle parking standards for stations</p>	<p>The Mayor is considering setting indicative rental guidelines through his Housing Strategy/the London Plan Annual Monitoring Report to ensure maximisation of provision and delivery of his affordable housing policies for boroughs to use through their rent and tenure and other housing policies (see paragraph 3.68). As far as planning policy is concerned, the definition of affordable rented housing in PPS3 makes clear that it has to be available at up to 80% of market rent and setting rent caps in the way suggested would be incompatible with national policy. This approach would also be likely to result in delivery of less than the maximum amount of affordable housing, and would therefore be incompatible with the thrust of London Plan policy.</p> <p>Agree in part – propose to add reference to “other” London Plan policies in Policy 3.12C.</p> <p>Support welcomed.</p> <p>Given the wide range of circumstances at stations in different parts of London, it is extremely difficult to set standards useful for general application. However this is an area where further work is being carried out and it may be that standards are brought forward as part of a future round of alterations.</p>
4	LB Southwark (for	3.61: incorrect to say SHMA indicates a requirement for	Government policy is that affordable rented housing

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	SE London Housing Partnership)	<p>“affordable rent” on the same basis as social rent. Impact of benefits reforms means should not assume that households needing to pay relatively higher rents will have their costs met by the benefits system.</p> <p>Reference to “rent controls” may not be entirely accurate in relation to affordable rent.</p> <p>Approach set out to affordable rent, with developers having a role in setting rent levels is not in keeping with approach in para 3.62 for intermediate housing based on setting qualifying rents and process locally in the light of local housing market characteristics.</p>	<p>will meet the same housing needs hitherto addressed by social housing. The Mayor is using his housing investment powers to agree delivery programmes with registered providers to ensure that the new product does meet the range of housing needs across London in the 2011-2015 investment round. On this basis, reference to the need for social housing identified through the SHMA is not inappropriate</p> <p>Words are directly quoted from PPS3.</p> <p>The approach being taken with affordable rent is in fact similar to that currently taken for intermediate housing, but adapted to take account of the differences between the products. A London-wide guideline is proposed through the London Housing Strategy/London Plan Annual Monitoring Report.</p>
5	LB Southwark	<p>Support proposed wording on National Planning Policy framework (although consider the alteration is inconsistent with it). Welcome idea of supplementary guidance on the NPPF and would like to be involved in its preparation.</p> <p>Question evidence base showing need for affordable rented homes, as not addressed in SHMA. Refers to two studies conducted by the borough.</p>	<p>Support welcomed. For the reasons explained in relation to the comments on Policy 3.12, the Mayor does not accept that his proposed approach is inappropriate with regard to the draft NPPF.</p> <p>The proposals are soundly based upon the SHMA. This was prepared in 2007-9, when there was only one product aimed at meeting the housing needs of those eligible for social rented housing. There is no reason to believe that the numbers of those in such need has changed materially, but there are now two housing products aimed at meeting this segment of need and</p>

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		<p>Policy 3.9: reference to affordable rent suggests that Mayor considers it is equated with market housing in terms of creating a more balanced mix of tenure.</p> <p>Policy 3.10: question whether affordable rent should be included as a form of affordable housing.</p> <p>Policy 3.11: affordable rent should be included in the intermediate housing target as in their view it will meet a similar need.</p> <p>3.12D should include reference to meeting identified needs based on a robust evidence base.</p> <p>Policy 3.12: welcome priority given to family housing</p> <p>Consider that the proposed new paragraph 3.12C is inconsistent with draft NPPF, and should allow greater</p>	<p>the proposed alterations recognise this. As the new product will be available at a range of rents across London, and will provide scope for more flexible management of the existing social rented stock, there is no evidence to suggest that this approach is incorrect. Not all affordable rent housing will be at rents at 80% of market levels; the Mayor has set a Londonwide average of 65%.</p> <p>The Mayor does not accept that this is a reasonable interpretation of the quoted words, which merely note that the new product will have a role in achieving the policy objective, not specifying what that role might be.</p> <p>PPS 3 is clear that affordable rent is distinct from intermediate housing, and that it is intended to meet the same type of housing need as social rented housing. As such, the treatment proposed in the alterations is appropriate.</p> <p>See above</p> <p>This point is already addressed in Policy 3.10.</p> <p>Support welcomed</p> <p>The NPPF is still in draft, and this is an issue on which the Mayor has made representations to Government.</p>
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		<p>flexibility about how commuted sums can be spent.</p> <p>Welcome clarifications of paragraphs 6.35 and 6.36.</p> <p>In paragraph 6.36, should allow flexibility for docking stations to be considered as a substitute for cycle parking spaces</p> <p>Table 6.3 ought to be clear that the standards are minima and can be exceeded in appropriate locations</p> <p>Should define the allocation of spaces separately for staff and visitors.</p> <p>Paragraph 6A.11 should refer to clear guidance about stands which are accessible to all users.</p>	<p>In the particular context of London, with its pressing need for affordable housing, the Mayor considers the proposed approach is appropriate.</p> <p>Support welcomed</p> <p>This would be inconsistent with the approach taken in policies 6.9 and 6.13 to encourage cycling to work. The Cycle Hire Scheme is aimed at a different objective.</p> <p>This is reasonably clear from Policy 6.13Dc</p> <p>Evidence to support separate provision in the way suggested is lacking. Implementation of the policy will be monitored and further alterations made if experience shows these are merited.</p> <p>This is a level of detail inappropriate for the London Plan. Consideration will be given to the production of further guidance on this matter</p>
6	LB Tower Hamlets	<p>Seeks assurances that the alterations will not constrain the Council from seeking to agree rental levels which meet the housing needs of its residents, including its policy approach to secure affordable housing at targets rents, particularly for family homes, where this is viable.</p> <p>Cite local research testing viability of affordable rent that</p>	<p>The Council’s proposed planning policies are not in conformity with existing London Plan policy to maximise affordable housing delivery, or with national planning or housing policies. The Mayor intends to issue rent guidelines through the London Housing Strategy/London Plan Annual Monitoring Report for boroughs to take into account in their rent and tenure strategies.</p> <p>Research provides little evidence that this is the case,</p>

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		<p>shows that effect of new product will be to inflate land values making social rent unviable</p> <p>Should not set long-term planning policy on the basis of a four year funding regime set by the Homes and Communities Agency</p>	<p>rather tends to support viability case for the new product.</p> <p>The proposed alterations have been drafted to be sufficiently flexible to accommodate future funding arrangements. If the London Plan requires revision to take account of new arrangements, further alterations will be brought forward as appropriate.</p>
7	<p>LB Wandsworth <i>(NB these comments were submitted on the draft supplementary guidance note on affordable housing, but deal with the same issues as the draft alterations, so are being dealt with here)</i></p>	<p>Three Dragons Toolkit is no longer suitable as it does not make adequate provision for affordable rent.</p> <p>Suggest a different approach to affordable housing in schemes: maximum reasonable levels of affordable housing agreed for each site, developers seek a provider who will either pay the price or propose a lower one triggering a review, review terms agreed between the developer and borough</p>	<p>Being addressed as part of current toolkit review</p> <p>This approach is incompatible with the Government/Homes and Communities Agency 2011-15 Affordable Homes Programme Framework. The Mayor intends to issue rent guidelines through the London Housing Strategy/London Plan Annual Monitoring Report for boroughs to take into account in their rent and tenure strategies.</p>
8	National Housing Federation	<p>Mayor should confirm alterations should only be given limited weight until they have been through the formal process.</p> <p>Boroughs should be encouraged to set percentage-based affordable housing targets.</p>	<p>The weight to be given to emerging policy is a well-known planning principle that does not require repetition in the current context.</p> <p>This is strictly beyond the scope of the proposed alterations. However, the Mayor considers that there is not justification for requiring boroughs to take a percentage-based approach. The issue was extensively debated through the process leading up to publication of the London Plan, and there is nothing to</p>

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		<p>Alterations should make explicit reference to the need for boroughs to allocate sites for affordable housing</p> <p>The Mayor should consider changes to the SHMA methodology to ensure the need for affordable rent is reflected.</p> <p>London Plan should have purely needs-based affordable housing targets, in accordance with the draft National Planning Policy Framework.</p> <p>Mayor may need to give further guidance if Government decide to relax controls over changes of use from commercial to residential</p>	<p>suggest that the existing approach should be reconsidered.</p> <p>The need to identify sites for housing is dealt with clearly in Policy 3.3. It is likely that land for affordable housing will have to be considered as part of an overall approach to identifying housing land.</p> <p>Noted. Government is clear that affordable rent should address the needs of those hitherto accommodated by social rent, and the SHMA identifies the scale of this segment of need. Though the SHMA was prepared in 2007-9, when there was only one product aimed at meeting these needs, there is no reason to believe that the numbers concerned have changed materially – the main change is that there are now two products intended to meet this and the alterations reflect this.</p> <p>Strictly beyond the scope of the alterations. The Framework is still in draft, and the Mayor considers that in the particular circumstances of London there are significant practical problems with taking this approach, which he has drawn to the Government’s attention. The targets in the London Plan were prepared in accordance with current national guidance in PPS3.</p> <p>The Mayor will consider the need for further guidance if Government decides to take this course.</p>
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		<p>London Plan should give guidance on how to deal with applications to vary section 106 agreements.</p> <p>Plan should be clear that boroughs should not attempt to use planning agreements to set any affordable rent criteria beyond those set out in national policy</p> <p>Should be clear that commuted sums for affordable housing would only be acceptable if it could be robustly justified and if the agreed approach contributes to the objective of creating mixed, inclusive and balanced neighbourhoods. Not clear what would constitute an “exceptional case” or about the process to be followed to establish this</p> <p>Para 3.74: pooling of commuted sums should only be allowed where it would secure a higher level of provision, better address priority needs, secure a more balanced community and better sustain strategically important clusters of economic activity.</p> <p>Para. 3.71: use of the term “contract” is unclear, and may be unduly inflexible or onerous, slowing down the process. Is a need for flexibility about how information about resources available is given to developers by</p>	<p>There is no evidence that guidance further than that already given in the London Plan is required. The Mayor will keep the position under review and will bring such guidance forward if necessary.</p> <p>Agreed. New wording proposed in paragraph 3.68; the point will be reinforced in supplementary guidance.</p> <p>The Mayor agrees with the thrust of this comment, but considers that the proposed alterations strike the correct balance on this issue. The planning system requires each case to be considered on its merits and in the light of all material considerations, and it would be difficult and perhaps unhelpful to try to define every “exceptional circumstance” that might justify payment of a commuted sum. The existence of such circumstances would be considered as part of the normal planning process, and the Mayor does not consider this needs to be spelt out in the London Plan.</p> <p>The Mayor considers the proposed alteration strikes an appropriate balance on this issue.</p> <p>Agreed. New wording to paragraph 3.71 proposed.</p>

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9	London Cycling Campaign	<p>providers.</p> <p>Consider revisions to cycle parking standard are significantly lower than required to permit the higher level of cycling the mayor aspires to.</p> <p>The Mayor should adopt Hillingdon’s standards</p> <p>Revision of B1 office standard is inadequate. It (and that for A2 financial uses) should be one space/80 sq m or better.</p> <p>Office parking standards should take account of reducing person per sq m office areas</p>	<p>As the London Plan makes clear, it is important to ensure that efficient use is made of London’s landscape. With this in mind, the Mayor’s approach has been to set standards based on evidence on current and future need. TfL have been conducting a review of current supply and demand across different uses. These proposals are the first stage of a complete review of standards, and it is likely that more will be forthcoming as the research and evidence base is conducted.</p> <p>The alterations are based on the pan-London evidence available. Policy 6.13 makes clear that the standards are minima, and boroughs able to justify more generous standards locally are free to do so.</p> <p>See earlier comment</p> <p>The evidence available suggests that occupancy densities vary by employment sector and location in London. Greater employment densities are also offset to some extent by flexible working practices that reduce travel to work. The Mayor considers that the proposed standards, based on surveys of parking space provision and occupancy, are a reasonable means of identifying the need for additional provision. These issues will be kept under review and further alterations made if necessary.</p>
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		<p>Standards for places of education should be higher</p> <p>Should be standards set for rail stations. If numbers are to agreed with TfL on a case-by-case basis this needs to be a requirement and TfL should ensure space provision exceeds demand.</p> <p>Standards should specify the required area for cycle parking – at least one metre per space</p> <p>There should be “per employee” standards for offices (1 space per 5 employees in office development plus sufficient lockers and showers)</p> <p>Para 6.35: should refer to developers funding off-site cycle parking.</p>	<p>These will be reviewed as part of the TfL research and further alterations will be brought forward if evidence justifies.</p> <p>This issue will be reviewed as part of the TfL research and further alterations will be brought forward if evidence justifies.</p> <p>This is a matter of detail more appropriate to guidance than the London Plan.</p> <p>“Per employee” standards are difficult to apply through the planning system as there may not be reliable information about numbers at the development stage when occupiers may not be identified.</p> <p>Agreed. Additional wording added.</p>
10	Town and Country Planning Association	<p>Object to proposal to combine social rent and affordable rent targets because of fundamental differences between them in terms of security of tenure and rent levels. SHMA suggests need for 44% of new homes to be social rented and 11% intermediate; affordable rent should be included in intermediate target. Cannot rely on continued availability of Housing Benefit. The definition of affordability used in the London Plan was explicitly intended to relate to low income households not dependent on benefits</p>	<p>The proposals are soundly based upon the SHMA. This was prepared in 2007-9, when there was only one product aimed at meeting the housing needs of those eligible for social rented housing. There is no reason to believe that the numbers of those in such need has changed materially, but there are now two housing products aimed at meeting this segment of need and the proposed alterations recognise this. As the new product will be available at a range of rents across London, and will provide scope for more flexible management of the existing social rented stock, there</p>

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			<p>is no evidence to suggest that this approach is incorrect.</p> <p>The definition of affordable rented housing set in national policy makes clear that this product is aimed at meeting the needs of households eligible for social rented housing. In practice, there is also likely to be a considerable overlap between social and affordable rented housing in terms of rents paid. Given this, the Mayor considers that a joint target is appropriate.</p> <p>Policy 3.10 reflects national policy set out in PPS3. It does not talk about incomes net of benefits (nor does the draft Housing SPG; the reference cited relates to eligibility criteria for intermediate housing).</p>
11	Campaign for Clear Air in London	Support proposal to delete definition of “air quality neutral” from the Glossary	Support welcomed
12	London Tenants Federation	<p>Object to proposed alterations to add references to affordable rent in policies 3.8, and 3.11.</p> <p>Proposals are not evidence-based – existing SHMA provides no information on how many households currently assessed as needing social rented homes might be able to afford up to 80% of market rents.</p> <p>As PPS 3 recognises three different types of affordable housing, the London Plan should set targets for each separately.</p>	<p>Objection noted. The Mayor considers the alterations are necessary to ensure the delivery of affordable housing in the light of changes to national planning and housing policy</p> <p>See comments on similar point made by Town and Country Planning Association.</p> <p>Strictly, the PPS3 reference cited refers to local planning authorities rather than the Mayor. In any event, it does not require separate targets to be set for each of the types of affordable housing, rather that</p>

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		The proposed alteration conflicts with London Plan objective to tackle deprivation and inequality among Londoners	<p>separate targets for social rented and intermediate housing should be set “where appropriate” (paragraph 29). Given the changes in policy since this guidance was drafted, the Mayor considers that his approach is compatible with the wording and spirit of PPS3</p> <p>On the evidence available, particularly regarding developing Government policy and the availability of funding in the current affordable housing round (and its likely availability into the future), the approach outlined in the draft alterations is likely to maximise the delivery of affordable housing. In this way it will support delivery of this objective rather than inhibit it.</p>
13	Just Space Network	Reiterates points made by TCPA (10) and the London Tenants’ Forum (12)	See responses to TCPA, London Tenants’ Forum and national Housing Federation
14	Client Earth	Reiterates points made by Campaign for Clear Air in London (11)	See response to Campaign for Clear Air in London
15	Drivers Jonas Deloitte for University College London	Welcomes addition of a specific cycle parking standard for student accommodation, and considers the standard proposed is suitable given UCL’s own aspiration to encourage cycling and experience of operating student halls of residence	Support welcomed

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Integrated Impact Assessment (IIA) Scoping Report Responses

The two responses to the IIA have been analysed by URS, the consultants undertaking the sustainability appraisal of this Alteration. These comments are included in the IIA to be published at the same time as the public consultation draft of the early minor alterations

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IIA1	English Heritage	Although the proposed alterations may have limited impacts upon the historic environment, would still suggest the IIA considers the historic environment in its widest terms, with a robust baseline understanding.
IIA2	Environment Agency	Support the approach taken for the IIA. Agree with the proposed use of only the IIA objectives that are relevant to the proposed alterations.