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# Report to the Mayor of London

by **Geoff Salter BA MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 19 June 2013

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GREATER LONDON AUTHORITY ACT 1999

PART VIII

**REPORT ON THE EXAMINATION INTO THE REVISED EARLY MINOR  
ALTERATIONS TO THE LONDON PLAN**

Examination in Public 19-23 November 2012



## Abbreviations Used in this Report

AA	Appropriate Assessment
AHVA	Affordable Housing Viability Assessment
CIL	Community Infrastructure Levy
DPD	Development Plan Document
GLA	Greater London Authority
IIA	Integrated Impact Assessment
LDF	Local Development Framework
LDS	Local Development Scheme
LP	London Plan
PPTS	Planning policy for traveller sites
PHM	Pre hearing meeting
REMA	Revised Minor Early Alterations
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SESC	Schedule of Early Suggested Changes
SHMA	Strategic Housing Market Assessment
TfL	Transport for London
#	paragraph
sq m	square metres
m	million

## **Non-Technical Summary**

This report concludes that the Revised Minor Early Alterations (REMA) to the London Plan (LP) provide an appropriate basis for the planning of London over the next 10 years, providing some changes to the alterations are made in accordance with my list of recommendations in Appendix to the report. The proposed changes can be summarised as follows:

- Omit references preventing the Boroughs from imposing rent caps or criteria for the definition of affordable housing in their own DPD documents; allow the Boroughs to be involved in approving affordable housing schemes not funded by the Mayor;
- Adopt changes to the definition of locally significant Green Spaces, in accordance with the NPPF; and
- Omit prescriptive references to how Boroughs should use their own Community Infrastructure Levy (CIL).

## Introduction

1. This report contains my assessment of the Revised Minor Early Alterations (REMA) to the London Plan (LP), in accordance with the processes prescribed in the Greater London Authority (GLA) Act 1999 (the GLA Act) and the London Spatial Development Strategy Regulations 2000 (the Regulations), in particular regulation 7(7).
2. It considers first whether the Alterations have met the legal requirements of the Act and Regulations. In the absence of any other statutory regulations or guidance, all parties, including the Mayor, agreed at the pre hearing meeting (PHM) that my role should be to assess the REMA against the tests of soundness as currently set out in the National Planning Policy Framework (NPPF). These are that the REMA should be positively prepared, justified, effective and consistent with national policy. I have applied these tests to each of the main issues identified below. The starting point for the examination is the assumption that the Mayor has submitted what he considers to be Alterations that do not affect the soundness of the London Plan itself. As was made clear at the PHM, the examination process did not include consideration of any parts of the London Plan that remain unchanged.
3. The basis for my examination is the Alterations published for public consultation in June 2012. Since that date the mayor has published some additional changes, a Schedule of Early Suggested Changes SESC, published in September 2012. These are minor changes to improve wording, provide clarity, correct typographical errors and update facts which by and large do not require further consultation or comment. One change which does go to soundness is recommended for adoption.
4. My report contains an assessment of the matters selected for discussion in the light of the representation and the discussion at the EIP. It does not provide a detailed transcript of what was said at the hearings but explores each matter and provides a reasoned justification for the recommendations on the main issues.
5. My report deals with the main changes that are needed to make the revised LP sound and legally compliant and they are identified in bold in the report (**IC**). None of these changes goes outside the parameters of the original matters for discussion and none of them require further consultation or additional Sustainability Appraisal (SA).

## Legal requirements

6. Section 110 of the Localism Act introduced a new section (33A) of the Planning and Compulsory Purchase Act 2004 which imposes a duty on local planning authorities and other prescribed bodies to co-operate in a range of planning activities. The Mayor is a prescribed person for

the purposes of the duty but the London Plan is in effect a regional strategy (RS), the preparation of which does not fall within the list of activities covered by the duty, such as preparation of Development Plan Documents (DPDs). Activities that can reasonably be described as preparing the way for activities such as DPD preparation fall within the duty. However, I do not agree with the South East Waste Planning Advisory Group and the East of England Waste Technical Advisory Body that the LP can be considered to meet this definition, since its production is an activity in its own right.

7. Under the terms of the GLA Act, the Mayor does have a duty to consult a number of bodies, including the Boroughs and neighbouring authorities. I am satisfied that this legal requirement has been met by the extensive consultations on both the draft Early Minor Alterations in February 2012 and the REMA in June 2012. Consultation is not necessarily the same thing as co-operation, however. The policy advice in paragraph (#) 178 of the NPPF concerning the need for public bodies to co-operate on planning issues that cross administrative boundaries does apply to the Mayor. I address whether the REMA are consistent with this advice in my discussion of the main issues, including that concerning the needs of gypsies and travellers.
8. As to other legal requirements, a Sustainability Appraisal (SA) of the REMA has been carried out as part of an Integrated Impact Assessment (IIA) and is adequate. The IIA also includes an equalities impact assessment, which examines the impact of the Alterations on equalities groups, and health and community safety impacts. This is also satisfactory and meets the requirements of the GLA Act and the Equalities Act 2010.

## **Assessment of Soundness**

### **Main Issues**

9. The Alterations have been prepared in response to the publication of the NPPF in March 2012. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified a number of topics upon which the soundness of the REMA depends. Of these, the most significant in my view is the justification for the alterations concerning affordable housing.

### **Sustainability**

Will the altered London Plan create an adequate framework for sustainable development?

10. The Mayor argued that the concept of achieving sustainable development underpinned both the LP and the REMA and I found no evidence to seriously question this position. Although a number of

queries were raised by some representors, including Friends of the Earth and Just Space, many of the issues concerned material and policies that had been omitted from the original Plan, as approved, not the REMA themselves. The panel which examined the Plan in 2011 concluded that it dealt satisfactorily with sustainable development. I consider that the REMA are broadly consistent with the policies in it, as supported by the integrated impact assessment (IIA) documentation.<sup>1</sup> The Mayor has published some further minor changes to meet some of the requests from representors, which include additional references to sustainability principles. However, these do not go to the soundness of the Plan and require no specific endorsement from me. I deal with relevant aspects of sustainability in my discussion of particular issues below.

## **Affordable Housing**

### *Definition of affordable housing*

Are the provisions of Policy 3.10 justified by the evidence base and consistent with the NPPF?

11. The policies of LP were informed by the London Strategic Housing Market Assessment (SHMA), prepared in 2008 and finalised in 2009. Although work has begun to update this important data source, it will not be completed until some time towards the end of 2013, when more detailed information from the 2011 census will be available. At the time of the preparation of the SHMA the affordable rent model was not operative and the survey material was used to justify the breakdown between just two categories of affordable housing: social rent and intermediate in a 60:40 split.
12. The proposed alterations to Policy 3.10 include a reference to the affordable rent product and change the wording about both eligibility criteria and the requirement to retain affordable housing in the long term. The consortium of Boroughs opposed to this part of the REMA presented more up to date evidence about rent and income levels in inner London, which I discuss in more detail with regard to other policy aspects below. In essence the objectors' arguments concern the affordability of the affordable rent product in inner London if rent levels are to be set at a level anywhere near the maximum of 80% of market rents that the definition allows.
13. Within London the Mayor has taken on the functions of the Homes and Communities Agency (HCA) and is charged with delivery of affordable housing over the period 2011-15. For new schemes funded through this source, almost all the grant subsidy will be channelled into schemes offering the affordable rent product. However some social rent schemes may come forward, through the programmes of other providers such as the Boroughs themselves,

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<sup>1</sup> CD 02, CD 08

although these are not likely to be a large proportion of the overall amount of rented housing. There is no evidence that funding for intermediate housing will cease. The revised definition is factually accurate and follows closely the wording of the NPPF, particularly concerning eligibility, which is to be determined with regard to local incomes and local house prices. Although it is not justified by any new evidence, the revision to policy 3.10 is a pragmatic approach in the circumstances.

Target split - Is the split in Policy 3.11 between social/affordable rent and intermediate housing justified? Should there be separate targets for social and affordable rent?

14. The target in the LP of a 60:40 split between social rented and intermediate housing was based on information contained in the SHMA. The Mayor's justification for including affordable rent with social rent relies on the government's stated intention that the two products are intended to meet the same need. This is disputed by some representors, who argued that the product would be something of a hybrid more akin to intermediate housing in terms of the income levels of the prospective occupants.
15. As discussed at the hearing by analogy with different types of fruit (oranges, mandarins and apples), the different forms of affordable housing may well turn out to have some varying characteristics that warrant a revision of the target split. While the majority of grant funding by the Mayor will support affordable rent, some new social rent may come forward from other providers, as already noted. Given the significant changes in the prices and rent levels for housing across London since 2008, the evidence base of the SHMA is already somewhat dated, and takes no account of the affordable rent model. In these circumstances the overall balance of needs for each type of affordable housing may be affected and the split between them should be reviewed.
16. At present, however, there is no new evidence with which to assess what any changed split should be. The existing guideline has been applied with some flexibility, where justified, in the Boroughs (eg Islington and Tower Hamlets<sup>2</sup>).

Is it appropriate for the REMA to exclude the Boroughs from being involved in negotiations on affordable rent levels? Are the provisions restricting the Boroughs from setting their own rent caps justified and consistent with the NPPF?

17. The REMA are intended to reflect government policy within London, to maximise affordable housing provision through the charging of higher rents for affordable rent than those for social rent properties. The premise is that the higher value of affordable rented housing is

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<sup>2</sup> LBI comments on matters, LBTH statement #5.1



intended to encourage more private investment, taking on a higher level of risk than the lower, more assured values of social rent. The National Audit Office Report<sup>3</sup> indicates that the mechanism which will ensure that such housing remains affordable to those in need would be by increases in housing benefit. The details of how this mechanism would work for occupiers, in particular those families who would be subject to an overall benefit cap, remain uncertain.

18. The consortium of 9 London Boroughs objecting to # 3.63 of the REMA provided compelling evidence about the lack of affordability of homes at 60 -80% of market rents for many of their poorest residents<sup>4</sup>. Even if the programme were to be implemented at a London-wide average of 65% of market rent, the product would put affordable housing out of reach of many low income households. The Mayor could use his housing powers to subsidise some inner London affordable rent housing at lower percentages of market rent through rents at or close to 80% of market rent in the more affordable outer London Boroughs. Nevertheless, the Boroughs' concerns that the better value offered by housing in outer areas could lead to a major shift in the provision of affordable homes, especially larger family units, away from inner London may well be realised.
19. Clearly, the Mayor has a responsibility to ensure affordable housing is provided across the city as a whole. However, I am not convinced that the policy restrictions on Boroughs can be justified on the basis of a single housing market in London. The reality is that within one regional market there are a number of sub markets in inner and outer sectors that have their own characteristics, with considerable variations in types of accommodation, tenure, rents and sale prices.
20. The Mayor can in any event control the provision of a significant amount of affordable housing through distribution of his own resources in support of affordable rent schemes. But the setting of rent caps in individual Boroughs need not prejudice the London-wide housing target of an average affordable rent level of 65% of market rents for London as a whole. Not all affordable housing will be provided with support from the Mayor; other providers and mechanisms may be available. While different strands of policy need some consistency it is not necessarily appropriate for the Mayor to enforce his housing powers through a spatial planning document such as the LP.
21. The broad thrust of government policy in the NPPF for affordable housing has two key strands: to maximise necessary provision and deliver a wide choice of homes, including meeting affordable needs. The overarching objective of the policy would not be met if provision were to be maximised but the Boroughs could not meet the NPPF requirement to meet objectively assessed needs for market and

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<sup>3</sup> Doc RD13

<sup>4</sup> Eg, Hearing statements of LBs Islington, Southwark, Westminster

affordable housing in their own area. A number of Boroughs have produced evidence to cast much doubt on the ability of the affordable rent product in inner London to meet all affordable needs in their area. These are not necessarily just those with the very highest rental and sale prices such as Westminster and Kensington and Chelsea. In other Boroughs such as Islington and Tower Hamlets affordable rent homes would have to be offered at well below 65% of market rent to help those in need.

22. The NPPF does not give any priority to regional needs above locally defined needs. The evidence from the Boroughs suggests that even if some re-balancing occurs in the distribution of the grant support for affordable rent, there would be a very significant reduction in the amount of new affordable housing available to those on low incomes in the inner Boroughs. Much would depend on the operation of income support through housing benefit, an additional £1.4 billion of which is projected to make up the shortfall nationally. However, other factors such as the overall benefit cap would also need to be taken into account as their detailed implications become clear through implementation.
23. It might or might not be appropriate for the Boroughs to include matters of detailed housing policy in DPDs. Such matters would have to be justified in any examination in terms of providing for local needs and would have to be shown to be effective through adequate delivery mechanisms. If substantial numbers of affordable homes could be provided by other means than grant-supported affordable rent there is no planning policy reason why Boroughs should not allow for this in DPDs. The Boroughs as local planning authorities should be enabled to meet objectively assessed needs for affordable housing, the eligibility for which has to be established by reference to local prices and income levels<sup>5</sup>. Such a policy stance would be consistent with the spirit of the Localism Act and would complement their ability to negotiate affordable housing contributions to help meet locally assessed needs at planning application stage.
24. The letter from the former housing minister in support of the REMA<sup>6</sup> is an indication of an aspect of government policy regarding affordable housing needs but national planning policy does not give priority to regional needs. The effect of the policy context set in the REMA is likely to result in increased provision of affordable rent homes in outer Boroughs and some inner Boroughs being reliant on others to meet needs. The duty to co-operate would apply to local plan making but the risk of under-provision in local housing markets would be real. A policy framework set out by the Mayor which might preclude effective provision of housing that is genuinely affordable in parts of London could be argued to be inconsistent with the thrust of policy in the NPPF. Any planning requirements at borough level to

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<sup>5</sup> NPPF Annex 2

<sup>6</sup> 01 DCLG REMA response 2 - Letter dated 2/8/12 –

provide for affordable housing need not breach the thrust of NPPF policy but would have to be justified locally by sound evidence.

25. I have concluded that the proposed alterations to include the text # 3.63 is overly prescriptive and should be deleted. Similarly, the Boroughs should be included in the list of those involved in negotiating affordable rent levels in #3.61 for those schemes which are not funded by the Mayor and part of the text in # 3.68 should be removed **[IC1]**. The Mayor's approach on this issue is not consistent with that concerning provision for gypsies and travellers, where despite the arguments for giving some direction at a sub-regional level, the Mayor has left full responsibility to the Boroughs. Given the substantial influence he holds through his housing powers, I see no need for the Mayor to include text that specifically directs Boroughs how to meet their needs in accordance with the NPPF. The removal of a prohibition on rent caps does not provide any general endorsement of their acceptability; any local policies would have to be justified by an adequate evidence base.

### **Affordable housing targets**

Is it justified to set ranges of income levels for intermediate housing on a London-wide basis?

26. This consistent and longstanding strand of policy was agreed in the existing LP. The range of incomes, adjusted to reflect inflation, is sufficiently wide to ensure that local needs can be addressed across all of London. The revised supporting text of (#) 3.62 provides flexibility for Boroughs to set eligibility criteria with regard to local markets. These provisions of the plan are justified and will be effective.

### **Negotiating affordable housing**

Are the provisions of Policy 3.12 regarding on/off site location of affordable housing and cash in lieu contributions justified?

27. The policy makes clear that cash in lieu contributions for affordable housing will be allowed only in exceptional circumstances. There may be some occasions when provision of affordable housing on site cannot be achieved and some flexibility is required in order to maximize provision during negotiations. The provision of affordable housing in this way would be consistent with the statutory tests for planning obligations, in particular the requirement for a direct relationship between the proposed development and the benefit offered. The wording is sufficiently clear to be effective.

### **Affordable housing conclusions**

Will the policy help to secure balanced and sustainable communities? Will the changed policy context secure the increased amount of housing that is

affordable to those in need that the Mayor and other parties seek? Are the alterations justified and consistent with the NPPF?

28. The LP needs to address changed funding models but there is no new evidence which can be used to assess the likely impact of affordable housing provision in terms of meeting need in a number of inner London Boroughs. The Mayor can determine many aspects of provision through his housing powers. However, evidence of rent and income levels indicates that there is a very real risk of significant change in the amount of family housing in inner London, which has the potential to undermine social cohesion and the development of mixed sustainable communities. The funding available to provide a number of affordable rent homes at an average of 65% of market rents across London may be sufficient to meet the overall target numbers. Increased housing benefits may redress any shortfall of affordability, but the new regime is not fully in place and at present the implications of the overall benefit cap are unclear. I consider it would be unduly prescriptive for the LP to constrain Boroughs as to how to meet their own needs. If provision at a lower level than 65% is justified, it should not be prevented by the plan. Any local policies for rent levels put forward by the Boroughs would have to be justified and shown to be effective at the local level. However, it is consistent with NPPF to allow the planning policy context as to how these needs should be addressed to be considered at local DPD examinations.

### **Other housing matters**

Should the REMA give more specific support for self build, community land trusts and housing co-operatives?

29. The LP is already supportive of new housing in all forms and gives particular support to community-based approaches to development, including community land trusts in #8.5. The Mayor has indicated that another revision to the plan to give additional encouragement to similar mechanisms such as self build will be considered when further research has been carried out to establish the level of demand in London, as flagged up in new # 3.57a Further alterations to the plan could be made once the SHMA has been updated. This reasonable approach gives some re-assurance that the needs of this sector of the housing market will not be overlooked. Making further additions to the LP at this stage would go beyond the remit of the examination.

### **Gypsies and Travellers**

Will the requirements of Policy 3.8Bi provide adequate guidance to ensure that the needs of gypsies and travellers are met in accordance with the government's 'Planning policy for traveller sites'?

30. The REMA make one change to the text of the LP in Policy 3.8i, which requires Boroughs to work with the Mayor to ensure that the

accommodation requirements of gypsies and travellers are identified and addressed, *with sites identified* in line with national guidance. Some representors argued that the Mayor had failed to pro-actively consult and meet with community and interest groups such as the Gypsy and Traveller Unit (GTU) in accordance with the policy requirements of the NPPF and #6 of the Planning policy for travellers sites (PPTS), to cooperate regarding strategic issues. As a consequence, the REMA did not deal adequately with the issue of gypsies and travellers at a strategic level.

31. However, the Mayor's stance has been quite clear since the adoption of the LP that this matter should be dealt with at the local, borough level. In essence, the representors did not object to the additional words of the REMA regarding site provision but to the policy context as adopted in the LP. They argued that no new travellers' sites had come forward since 1994 and they were unlikely to do so, unless the Mayor took on a proactive role at a sub-regional level to meet identified needs. However, to meet these objections would require an updated survey and considerable negotiation between the travelling community, the Mayor and the Boroughs. A full consultation exercise would be required in accordance with the statutory provisions of the GLA Act; to go through these procedures would be well beyond the remit of my examination, which is limited to a consideration of the submitted alterations.

### **Cycle Standards**

Are the revised cycle standards, with particular reference to those for offices, places of education and stations, appropriate and justified?

32. Although the proportion of cycle trips in London remains very low compared with other modes such as public transport, walking and the car, there has been a substantial increase of about 70% in the number of daily trips between 2001 and 2010. This reflects some success in achieving a strategic policy objective to secure more sustainable transport modes across London. The standards have been revised for certain types of development, notably offices, student accommodation and visitor standards for residential development. The revisions followed a report by Transport for London (TfL) which set out the survey evidence base for the changes for those categories of development where updated information was available.<sup>7</sup>
33. In other categories the standards relate to both staff and visitors. I understand that this does not reduce the level of parking from the previous standard, which did not include visitors' parking. The new standard allows for different types of provision to be made to reflect the slightly differing needs of both groups. While I appreciate the concerns of objectors that staff parking may be reduced as a result,

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<sup>7</sup> CD 06

there is no up-dated survey material for certain types of development, such as higher education establishments, on which to base a revision to the standards at the present time. Similarly, requirements at stations should be subject to a further separate assessment, in consultation with TfL.

34. Any changes to increase the standards following further comparable survey information, as sought by the London Cycling Campaign and others, would require revised public consultation. The Mayor confirmed that a programme of such surveys was under way, following which the standards would be reviewed again. Of support to those who argued that the standards were too low is the point that they are expressed as minima and Boroughs would be able to impose more stringent requirements if they can be justified by their own research and local needs. Based on the available survey evidence, I agree with the Mayor that the revised London standards present a reasonable compromise between the need to encourage more cycling through better parking provision and the impact on development viability.

Will the dispensation to allow short term cycle parking off site lead to effective cycle provision?

35. The phrasing of the policy guidance about off-site provision indicates very clearly that this is seen as an exceptional measure which might be appropriate in a very small number of cases on highly constrained sites. I consider this approach would enable adequate provision to be made in all new developments; it is reasonable and justified.

### **Health inequalities**

Do the Alterations give sufficient guidance on policies to reduce health inequalities?

36. In essence the representations on those alterations dealing with health inequalities did not question the validity of the new explanatory text but argued that the Plan did not go far enough in proposing more measures at the strategic level. The REMA set out in the main some updates of factual references, in particular those concerning the responsibilities of various agencies. The Mayor has agreed to incorporate some other very minor changes to indicate an intention to explore opportunities to improve the health of Londoners. An additional reference to the accessibility of primary health care facilities would also be helpful. In general, however, I consider the text of the REMA properly reflects the strategic responsibilities of the Mayor; other minor improvements which do not go to the soundness of the Plan would not require further consultation.

## Living Spaces

Are the Alterations in paragraph 7.5 about green spaces consistent with the NPPF?

37. The Mayor has proposed a further minor change to # 7.5 of the REMA to ensure that it properly reflects the text of the NPPF regarding the criteria for designating local green spaces of particular significance for local communities. This change would ensure consistency with the NPPF, avoid confusion of terminology in definitions and make the LP effective **[IC2]**. Within Local Green Spaces subject to this designation policy should be consistent with that for green belts. I agree with the Mayor's argument that to include these areas within the hierarchy of types of Public Open Space in Table 7.2, which does not include policy designations such as the green belt and Metropolitan Open Land, could lead to confusion.

Are the Alterations concerning heritage assets justified and consistent with the NPPF?

38. The Mayor has proposed an amendment to # 7.31<sup>8</sup> which addresses the concerns of English Heritage and clarifies the approach taken to 'substantial harm to designated heritage assets'. The changes, including the addition to the glossary, are consistent with the NPPF and would ensure effectiveness.

Should the Plan annotate those policies which are relevant for neighbourhood planning conformity purposes?

39. I agree with the Mayor that the strategic policies of the LP are of less relevance for neighbourhood plans than the range of more locally important DPDs likely to be prepared by the Boroughs. I note that the Mayor intends to give further thought to appropriate processes and to draw up guidance for neighbourhood forums to assist in the preparation of neighbourhood plans but that further research is needed before this can be done. The lack of annotated policies deemed to be of relevance for neighbourhood planning does not go to the soundness of the plan.

## Community Infrastructure Levy (CIL)

Is the policy context for the development and implementation of the CIL justified and consistent with government policy?

40. The alterations concerning the Mayor's own charging schedule, which was approved in February 2012, are factually correct and thus reasonable. The CIL Regulations state that, once levied, it is for the charging authorities to decide how the funds will be spent. In the Mayor's case, he has committed his own CIL income towards

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<sup>8</sup> ED 06

Crossrail. However, I share some of the concerns of the Boroughs and others about the provisions in the new section D of Policy 8.3 concerning LDFs prepared by others. I recognise that the Mayor has a particular concern about the need to ensure the adequate provision of strategic infrastructure across London and quite rightly might wish to encourage the Boroughs to give priority to spending programmes in that field, and the development of opportunity and intensification areas. However, the provisions of section B of the policy would allow the Mayor to bring forward any other CIL needed to fund strategically important infrastructure. As the Mayor acknowledges, the CIL Regulations enable Boroughs to use their own CIL in any way they consider appropriate.

41. While the Mayor may encourage co-operation, the re-drafted provisions of Section D of policy 8.3 and #8.15A appear rather prescriptive. They do not reflect #175 of the NPPF, which states that CIL should incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place. I consider that the comments about priority to strategic infrastructure should be deleted from the Policy 8.3 and the supporting text, to ensure consistency with the NPPF and because they could not be effectively implemented in the event of a disagreement with any Borough **[IC3]**.

### **Overall Conclusion and Recommendation**

42. The REMA are sound subject to my recommendations set out in Appendix.

*Geoff Salter*

Inspector

This report is accompanied by the Appendix containing my recommended changes



## Appendix – Inspector's recommended changes

The page numbers and paragraph numbering below refer to the consolidated version of the REMA and other minor changes suggested by the Mayor, and do not take account of the deletion or addition of text.

Ref	Policy/ Paragraph	Change
IC1	3.61 2 <sup>nd</sup> bullet	Amend last sentence to read: '....set by agreement between developers, providers, the Mayor and, in dealing with individual planning applications for schemes not funded by the Mayor, the London Boroughs.'
	3.63	Delete the proposed new sentence that starts with "In view of the particular priority...".
	3.68	Delete: 'Boroughs should enable the range of affordable rents to be applied ..... other relevant documents.'
IC2	7.5	Adopt the changes set out under reference 7.1 of the SESC
IC3	8.3, #8.15A	Delete Section D of Policy 8.3 and paragraph 8.15A.