



Department for Communities and Local Government

The Rt Hon Greg Clark MP
Secretary of State for Communities and Local
Government

Department for Communities and Local Government

4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Tel: 0303 444 3450
Fax: 0303 444 3289
E-Mail: greg.clark@communities.gsi.gov.uk

www.gov.uk/dclg

Boris Johnson
Mayor of London
Mayor's Office
GLA, City Hall
The Queen's Walk
More London
London SE1 2AA

27 June 2015

Dear Boris

MINOR ALTERATIONS TO LONDON PLAN – GOVERNMENT RESPONSE TO CONSULTATION

Thank you very much for inviting comments on your latest minor alterations to the London Plan. I welcome your commitment to producing quality London homes in response to the growing demand across the capital. And I appreciate the effort which has been put into revising the technical housing aspects of the London Plan so quickly after the publication of the Housing Standards Review outcome in March. I am also pleased to see that you are carrying out an early review into residential parking standards which is in line with our change of parking policy announced on 25 March. However, other proposals in the minor alteration to the London plan raise some issues.

Energy standards / carbon dioxide emission targets

The proposals set out in the section on minimising carbon dioxide emissions policy include setting a target for new homes which is 35% above the national requirements set out in the current Building Regulations. In addition, the proposed targets for new non-domestic buildings are 35% above Building Regulations (rising to 50% in 2016). In the last Government, we implemented significant strengthening of the energy performance requirements in Building Regulations – a 30% improvement from the Labour administration. These are challenging standards reducing energy bills by £200 on average and saving carbon but we know that there are issues in practice in meeting them through the work of the independent Zero Carbon Hub. So it is important that requirements are practical and deliverable and that there is time for them to bed in – not least as the current changes only came into force last year.

We are also committed to reducing the regulatory costs and burdens on development and setting standards in London 35% higher than national requirements conflicts with that commitment. This also cuts across the policy in the Housing Standards Review that energy performance standards for new homes should only be set in Building Regulations, even taking into account the transitional arrangements set out in the Written Ministerial Statement of 25 March 2015 and the associated documents published on 27 March.

Access standards

The Written Ministerial Statement allows for the new building regulation equivalents of lifetime homes and wheelchair housing standards to be applied to new homes only where there is a clearly demonstrable and evidenced need, and the viability of new housing is not adversely affected. Available data on disability and the ageing population, published alongside the Written Ministerial Statement, suggests that whilst there is an overall national need for more accessible homes, the requirements of the minor alterations to the London Plan may overestimate actual demand for either of the higher accessibility standards across London.

Ceiling heights.

It is noted that the minor alterations to the London Plan P “strongly encourages” a ceiling height of 2.5m. The Government’s new, rationalised optional space standard sets out a standard for ceiling heights in new housing of 2.3m for 75% of the gross internal area. Furthermore, this national standard was proposed only as an optional standard, subject to a local needs justification and where there would be no adverse impact on local development viability.

I would welcome a continued dialogue with you in the lead up to the Examination to resolve these few remaining issues, and to ensure the London Plan revision process can be concluded speedily.

A handwritten signature in black ink, appearing to read 'Greg Clark', is positioned above the printed name.

THE RT HON GREG CLARK MP