

Specific Comments on the Consultation Document

Housing Standards – Minor Alterations to the London Plan Consultation Draft May 2015

Housing Quality and Design Policy

Policy 3.5 Quality and Design of Housing Developments, associated paragraphs and Tables 3.3 amendments.

Brent understands that through transitional arrangements that there is no need for the GLA to immediately amend the policy, paragraphs and Table 3.3 to ensure consistency with the Government's Nationally Described Space Standard. Nevertheless, Brent supports the proposed modifications. Early adoption of the Standard should introduce further efficiency in the cost of development as it proves a nationally transferable benchmark.

Paragraph 3.48A

The Council welcomes the inclusion of flexibility to address complying with the M4(2) (Lifetime Homes equivalent) requirement. The Council is very supportive of the inclusion of homes flexible enough to adapt to changes in the occupiers circumstances throughout their lives. Nevertheless the need for step free access and therefore in reality the provision of lifts in medium rise buildings will introduce additional construction and long term maintenance costs. The latter in particular is a concern in relation to planned estate regeneration and prospective tenants of subsequent affordable housing projects within the Borough.

Minimising Carbon Dioxide Emissions Policy

Policy 5.2 Minimising Carbon Dioxide Emissions Policy

Criterion B

The Council is supportive of the policy as set out in relation to targets for carbon dioxide reductions for residential as these reflect recent delivery trends and it would be perverse for policy to support a lowering of targets compared to delivery. Nevertheless, it is recognised that such targets are inconsistent with building regulations requirements and as such may well be considered to be beyond the remit of what Government considers planning can control.

Criterion F

The Council is supportive of this clarification in regard to where Allowable Solutions funds should be spent with its emphasis on 'Local' provision.

Paragraph 5.23B

The initial prioritisation of Allowable Solutions payment to 'Local' funds and the definition of 'Local' as being the respective Borough in which the development is located is supported.

Water Use and Supplies Policy**Paragraph 5.61**

The inclusion of the optional Part G of the Building Regulations target of a maximum of 105 litres per head or less per day is supported.