

City of London Corporation's Response to Draft Minor Alterations to the London Plan – Housing Standards and Parking Standards (May 2015)	
Draft Alterations	City of London Corporation Response
Housing Quality and Design Policy	
Policy 3.5: Quality and Design of Housing Developments	The City Corporation has no objection to the proposed changes to Policy 3.5.
Table 3.3 Minimum space standards for new development	<p>The City Corporation has no objection to amended Table 3.3. The table sets out the Government's nationally described space standards for residential development. These standards largely reflect those included in Table 3.3 of the 2015 London Plan, particularly in relation to 1 storey dwellings (flats) which constitute the majority of new residential development in the City.</p> <p>The City Corporation supports the strong encouragement for at least 75% of the GIA of dwellings to have a minimum ceiling height of 2.5m.</p>
Housing Choice Policy	
Policy 3.8: Housing Choice	<p>The City Corporation supports the alterations proposed to Policy 3.8 B c & d. These changes reflect the inclusion of new building regulation requirements for access arrangements and the potential to adopt optional standards above the minimum standard. They will ensure that current London Plan, and City Local Plan standards, for accessibility are retained as far as possible.</p> <p>The 2015 London Plan requires all new dwellings to be built to Lifetime Homes standards and 10% of dwellings to be wheelchair accessible. Lifetime Homes standards generally equate to new building regulation requirement M4(2) and wheelchair accessible to M4(3). The City Corporation understands that building regulation compliance must be assessed against a single requirement, therefore providing a 90%/10% split ensures the continuation of current London Plan policy in relation to wheelchair housing and seeks the maximum level of housing to the former lifetime homes.</p>
New paragraph 3.48A	This paragraph addresses the requirement in regulation M4(2) for step free access. Where installing a lift, or ensuring step free access, is not viable, building regulations require that the base building regulation M4(1) should be applied. This would result in a lower level of accessibility to some new residential dwellings and not deliver the requirements set out in Policy 3.8. The Mayor's draft Housing Supplementary Planning Guidance (also out for consultation) paragraph 2.3.11 encourages local planning

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	authorities to provide either bespoke assessments of accessibility or encourage schemes to apply the other requirements of M4(2) in such circumstances. The City Corporation supports the approach in the SPG, which is a pragmatic response to the need to ensure suitable access to all residential buildings. The City Corporation considers that it would be helpful for the guidance in SPG paragraph 2.3.11 to be incorporated into paragraph 3.48A of the London Plan to give it greater prominence in the determination of residential schemes.
New paragraph 3.49A	<p>This paragraph identifies the distinction in Planning Practice Guidance between wheelchair accessible and wheelchair adaptable dwellings. The City Corporation supports the advice in the proposed paragraph that boroughs should undertake locally specific assessments of need to inform the application of M4(3) standards.</p> <p>Building Regulation Part M4(3) refers to the potential for dwellings to provide suitable parking for wheelchair users. This is not addressed in paragraph 3.49A or elsewhere in the Minor Alterations. The City Corporation would like to see specific reference in the London Plan to the need to consider the provision of suitable parking spaces for wheelchair users, when meeting requirements under M4(3).</p>
Minimising Carbon Dioxide Emissions Policy	
Policy 5.2 Minimising Carbon Dioxide Emissions, paragraphs B & F	<i>Paragraph B:</i> The proposed changes to CO ₂ improvement targets for residential buildings are in line with the adopted Mayoral Sustainable Design and Construction SPG and with the targets adopted in the City of London Local Plan. The City Corporation supports the proposed changes.
New paragraphs 5.23A & 5.23B	For non-domestic buildings, the Minor Alterations propose a new requirement of a 50% improvement relative to 2013 building regulations in the period 2016-2019. This new target provides a stepping stone from the improvements required to 2016 and the requirement for zero carbon in 2019. Supporting evidence indicates that the type of development which is typical of the City (low and high rise offices) are expected to be able to achieve a best case improvement of 44-45%, meaning that most development will be required to deliver an element of carbon offsetting through the 'allowable solutions' approach. The City of London Local Plan already makes provision for allowable solutions and has an overarching objective to ensure that the City remains at the forefront of action in response to climate change. The City

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	Corporation, therefore, supports the proposed additional 50% improvement standard.
	<i>Paragraph F & new paragraphs 5.23A & 5.23B:</i> The proposed carbon offset hierarchy emphasises CO ₂ minimisation on-site, followed by allowable solutions in the local area and then allowable solutions within Greater London. The City Corporation supports the emphasis on on-site improvements and the requirement that allowable solutions address local or London based projects.
Water Use and Supplies Policy	
Footnote 24	This clarifies that the mains consumption target of 105 litres per day excludes the additional building regulations requirement of 5 litres or less per day for external water consumption. The City Corporation supports this additional clarification.
Parking Standards	The draft Minor Alterations in relation to parking standards deal with residential parking standards in those parts of Outer London with low public transport accessibility. The proposed policy approach does not impact on the City of London and the City Corporation has no comments on the proposed alterations.