

**Please ask for/reply to Steve Dennington**

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Boris Johnson, Mayor of London  
Housing Standards MALP  
FREEPOST LON15799  
GLA City Hall, post point 18  
The Queen's Walk  
LONDON SE1 2AA

19 June 2015

Dear Mayor,

**Re: Minor Alterations to the London Plan**

The London Borough of Croydon will rely on the Minor Alterations to the London Plan as part of the Development Plan for Croydon.

Croydon's comments on the Minor Alterations to the London Plan are as follows:

- The amendment to Policy 3.5 and Table 3.3- Croydon made comments on these space standards to the DCLG and has no further comment to make on the Minimum GIA in Table 3.3 as these are to be implemented as national standards.
- The Footnote 3 on Table 3.3 is supported.
- The proposed amendment to Policy 3.8 Housing Choice is supported
- Paragraph 3.48A- our comments here also refer to the revised Housing SPG 2015. To avoid being too onerous and constraining the delivery of homes the assessment of whether a lift should be incorporated to provide step free access for three storeys or less, should be in terms of the practicality only. Buildings of four storeys would also require a development specific viability assessment that demonstrated it was uneconomically viable to incorporate a lift.
- We disagree with the requirement in paragraph 3.49A to identify the level of need for wheelchair accessible dwellings in LDF policies as it should be sufficient to rely on the 90% and 10% requirement of M4 (2) and M4 (3) respectively and it would be difficult to establish evidence to identify the level of need and incorporate this in our Local Plan policies. An expressed level of need defined in Local Plan policy as a fixed figure across all sites would be a less flexible approach and could result in wheelchair accessible dwellings provided in inappropriate locations, such as at the top of a hill

away from access to good transport. The opportunity to negotiate on a site by site basis should not be lost.

- Minimising Carbon dioxide emissions Policy 5.2- is supported
- Paragraph 5.20 is supported.
- The Sustainable Design and Construction Policy is supported
- The Water Use and Supplies Policy is supported
- The amendment to the Lifetime Neighbours Policy is noted.

Croydon Council has the following comment on the Parking Standards;

- The outer London Parking standards have the risk of becoming an unvirtuous circle, namely car ownership remains high resulting in lack of demand for public transport (particularly buses), without the public transport alternative, residents have to rely on the private car leading to increased congestion, delay and environmental and health impacts.
- The parking standards must reflect the benefits to be derived from increasing densification including the ability to better support public transport provision (particularly with development funding contributions) and local services. Thus the parking standards should be based on potential PTALs

We will submit separate comments on the revised Housing SPG 2015

Yours sincerely

A handwritten signature in black ink, appearing to be 'S. Dennington', enclosed within a circular scribble.

Steve Dennington  
Deputy Head of Spatial Planning and Team Leader of Plan Making.