

Planning Policy

Harrow Council
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Harrow
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Date: 22 June 2015

Boris Johnson, Mayor of London
(Housing Standards MALP)
City Hall
The Queen's Walk
London
SE1 2AA

By email: mayor@london.gov.uk

Dear Mr Johnson,

Housing Standards Minor Alterations to the London Plan

Harrow Council welcomes the opportunity to comment on the Housing Standards Minor Alterations to the London Plan. In particular, we welcome the proposal to adopt the National Housing Standards as part of the London Plan. The Mayor's timely action on this should ensure that the approach to internal space standards introduced in the London Plan 2011 continues to the fullest extent possible under the Government's Housing Standards Review.

The Council supports the vast majority of changes proposed. The attached table contains Council's representations to the proposed housing standards minor alterations, highlighting those areas of support and those where further clarification could help to improve the alterations.

If you would like to discuss any of the Council's representations in more detail, please contact David Hughes, Planning Policy Manager, on 020 8736 6082 or david.hughes@harrow.gov.uk, who will be happy to discuss.

Kind Regards,

Caroline Bruce

Corporate Director of Environment & Enterprise

London Plan Minor Alterations – Housing Standards			
Representations of the London Borough of Harrow			Closing date: 22 June 2015
LBH Ref No.	Page	Policy / Para	Representations
1	3	Policy 3.5C	<p>Harrow's experience is that the quality of design for wheelchair users is often poor with significant effort required with applicants to ensure both the individual homes, and access to and around the development is fit for purpose.</p> <p>This paragraph identifies the 'arrival' at the building as a relevant consideration, but often there is very limited information provided by applicants with respect to design elements that impact upon the 'arrival' experience (i.e. gradients, materials, entry lighting, shelter etc). Clarification could therefore be provided with respect to what is meant by 'arrival' in this paragraph.</p>
2	3	Policy 3.5C	<p>The additional clarification that rooms should be adequately sized, convenient and efficient room layouts in order to be 'functional and fit for purpose' is welcomed. Reference could be made (within the policy or supporting text) to the broad issues or considerations that are relevant to determining whether rooms are 'functional and fit for purpose' i.e. proportionate dimensions / shape; this may be able to be achieved through cross-reference to the Mayor's Housing SPG.</p>
3	4	Para 3.36	<p>Whilst the retention of the encouragement for developers to exceed the minimum standards is welcomed, any additional floor space should result in an overall improvement / benefit to the functionality of rooms i.e. a few centimetres around the edges may result in additional floor space above the minimum standards but with no discernible benefit, whereas if this additional floor space was designed and utilised more effectively (for example, as an identifiable area for a desk), this would improve the overall functioning of the room. It is unclear however how effective this 'encouragement' to exceed minimum space standards will be without some form of incentive.</p>
4	5	Table 3.3	<p>Note 3 to Table 3.3 encouraging developers to exceed the nationally described space standard minimum ceiling height of 2.3 meters is welcomed as a response to London's specific development context, recognising the limited scope available to the GLA / London Plan to apply standards beyond the national standards. It is unclear however how effective this 'encouragement' will be without some form of incentive.</p>
5	8	Para 3.48A	<p>Reference could be made to lifts needing to be designed to accommodate both a wheelchair user and a carer.</p>
6	10	Policy 5.2B	<p>The updating of carbon emissions targets relative to the 2013 Building Regulations is welcomed as this provides clarity and reduces work required to demonstrate compliance. Reference to the energy hierarchy and on or off solutions is also welcomed.</p>

London Plan Minor Alterations – Housing Standards

Representations of the London Borough of Harrow

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7	11	Policy 5.2F	The introduction of Policy 5.2F (and paragraph 5.20A) in preparation of zero carbon is welcomed, particularly the hierarchy for Allowable Solutions that requires these to be within the local area first, followed by the GLA area. The flexibility between direct measures and payment into a local fund is also welcomed.
8	13	Paragraph 5.23	The matters which the Mayor will have regard to in determining the extent of on-site carbon reductions should be expanded to include site and policy specific constraints i.e. size, orientation, inclusion within a Conservation Area etc.
9	14	Paragraph 5.61	Harrow Council welcomes the Minor Alterations' proposal to require the 'optional requirement' under Part G of the Building Regulations, as London / Thames Water are classified as being water stressed.