

From: Dean James <dean.james@sutton.gov.uk>
Sent: 22 June 2015 16:58
To: Mayor
Cc: keithfraser; Andy Webber
Subject: Housing Standards MALP

Dear Sir / Madam,

Please find below the London Borough of Sutton's response to the MALP consultation on Housing Standards

Housing Standards

Minor Alterations to the London Plan

Policy 3.5 Quality and Design of Housing Developments

The council supports the inclusion of the national space standards for dwellings in the London Plan. It is noted that this is line with the London Plan standards for flats, but that those for 2 and 3 storey dwellings are marginally reduced and that the new table now includes space standards for larger dwellings (up to 6 bedrooms). However, it is not clear from the table as to whether the built in storage requirement is part of or additional to the minimum size of the dwellings. Clarification should be provided.

Policy 3.8 Housing Choice

There is concern that moving from a requirement that all dwellings should meet Lifetime Homes standards to one which requires that 90% of all new dwellings should meet the optional Building Regulation M4(2) "accessible and adaptable" dwellings will have cost and design implications that could affect site delivery. This change would seem to require that all blocks of flats of 4 storey or less, regardless of the number of units, would now require a lift in order to comply with this policy as proposed for modification. It is noted that the proposed modification in paragraph 3.48A includes a statement to the effect that this may be subject to development specific viability assessments and consideration of ongoing maintenance costs. However, any additional cost will affect the overall cost of the development and potentially compromise other benefits that might otherwise be achieved such as affordable housing as well as disproportionately affecting service charges for smaller developments. This could be particularly important for an outer London Borough such as Sutton in seeking to meet its future housing requirements and where 3 storey flatted developments form a high proportion of new developments. It may also give rise to an increase in the number of viability assessments that need to be submitted and it is not clear how council's should give consideration to ongoing maintenance costs.

It is noted that the above paragraph refers to further guidance being provided in the revised 2015 Housing SPG but the council would welcome early discussions/clarification on potential effects of the revised policy on housing delivery/costs in this borough.

It is assumed that the implications of Planning Practice Guidance for planning policy is that no market dwellings will need to be made wheelchair accessible (a dwelling designed to be used by a wheelchair user at completion), but there could be a requirement that they are made wheelchair adaptable. Hence at local level there is a need to further refine the 10% policy requirement for wheelchair user dwellings between wheelchair accessible and wheelchair adaptable requiring the council to assess the level of need for wheelchair accessible dwellings.

Policy 5.2 Minimising Carbon Dioxide emissions

The Council supports the Mayor's proposed policy target for major residential buildings from 2014-16 to achieve a 35% reduction in CO2 emissions compared to Part L 2013 through a combination of energy efficiency measures on-site, and low and zero carbon infrastructure, either on or offsite and notes that this is broadly equivalent to a 40% reduction compared to Part L 2010 required in the 2011 London Plan.

However the ability of planning policies to require residential developments to achieve CO2 reductions over and above the mandatory 25% reduction which previously applied at level 4 of the Code for Sustainable Homes has yet to be tested and there is a potential conflict with the Ministerial Statement published in advance of the introduction of the Deregulation Act of 25 March 2016.

The Council supports the Mayor's proposed policy target for major non-residential buildings from 2014-16 to achieve a 35% reduction in CO2 emissions compared to Part L 2013 through a combination of energy efficiency measures on-site, and low and zero carbon infrastructure, either on or offsite and notes that this is broadly equivalent to a 40% reduction compared to Part L 2010 required in the 2011 London Plan.

The Council supports the Mayor's proposed 'stepping stone' policy target for major non-residential buildings from 2016-19 to achieve a 50% reduction in CO2 emissions compared to Part L 2013 through a combination of energy efficiency measures on-site, and low and zero carbon infrastructure, either on or offsite.

The Council supports the Mayor's proposal that, prior to the implementation of zero carbon standards in 2016 and 2019 for major residential and non-residential developments respectively, any shortfall against CO2 reduction targets which cannot be achieved on-site may continue to be offset through a 'cash in lieu' contribution (i.e. Section 106) to deliver CO2 savings elsewhere

The Council supports with the proposal in Part F of Policy 5.2 that, in considering options for 'Allowable Solutions' post 2016/19, developers should apply the following hierarchy:

(1) Minimising CO2 emissions on-site;

(2) Delivery of Allowable Solutions measures in the local area (either through direct measures or payment into a local fund);

(3) Delivery of Allowable Solutions measures within Greater London (either through direct measures or payment into a local fund).

The Council supports the Mayor's intention set out in Para 5.23A to "seek to maximise the benefits of new development to the local and wider London area" by prioritising on-site or local Allowable Solutions measures over funding alternative carbon reduction measures elsewhere in the country. This will help to deliver the target in the Mayor's 'Climate Change Mitigation and Energy Strategy 2011' to deliver 25% of London's energy through decentralised sources of energy by 2025 and support the delivery of district heating networks and local retrofit programmes.

There are no further comments in respect of the housing standards of the Minor Alterations.

Kind regards

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