

Wandsworth Council

Housing and Community Services Department
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BY EMAIL

Boris Johnson, Mayor of London
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Our ref: HCS/none
Your ref:
Date: 22 June 2015

Dear Mr Johnson

Housing Standards-MALP

Thank you for consulting Wandsworth Council on the Minor Alterations to the London Plan (MALP). Officer-level comments are provided below:

General comments: Overall the Council supports the proposed changes and welcomes the clarification of the London Plan's position following publication of the new national Technical Housing Standards-nationally described space standard, March 2015 (national technical standards). However it is noted that the MALP consultation is now out of step with consultation on the Mayor's revised Housing SPG. The Council will be responding to the latter separately.

The main issue of concern relates to the impact of the Government's Written Ministerial Statement (March 2015) threshold for affordable housing and zero carbon homes (11 plus dwellings/ more than 1,000 sq ms combined total floorspace), which is now different to the Mayor's definition of major development where proposals for 10 or more homes require affordable housing, and which are classed as a major development for applying the Policy 5.2B (Minimising CO2 emissions).

Introduction: It is noted that the MALP now takes on board the new national technical standards. It would be useful if the Mayor could address the issues arising from the definition in the Ministerial Statement of small sites (10 units or fewer) for the purposes of affordable housing requirements and zero carbon homes standards as explained above, as well as changes relating to water efficiency and access. It would also be useful to refer in the introduction to the draft changes proposed to the Housing SPG, which has a chapter on Housing Quality, as well as on affordable housing.

Policy 3.5 Quality and Design of Housing Developments: Changes relating to accessibility, water efficiency and room layouts in new homes are noted and are supported overall. In terms of accessible and adaptable dwellings, the Council's approach to the changes to the former Lifetime Homes and Wheelchair Housing requirements is to propose further changes to Core Strategy Policy IS5 and the

supporting text; to take on board both the standards in the building regulations referred to in the MALP as well as the Written Ministerial Statement; and make reference to the further guidance to be provided in the revised Mayor's Housing SPG. The Council would therefore prefer to see further changes to Policy 3.5 and supporting text to refer to the Ministerial Statement and the revised Housing SPG.

Table 3.3 Minimum space standards for new development: Changes are noted and are it is intended to incorporate these into the Wandsworth Local Plan Review (Development Management Policies Document –Policy DMH6 and supporting text).

Policy 3.8 Housing Choice: The proposed changes are noted and are supported overall. As with the response to Policy 3.5, the Council would therefore prefer to see further changes to Policy 3.8 and supporting text to refer to the Written Ministerial Statement and the revised Housing SPG.

Policy 5.2 Minimising Carbon Dioxide Emissions: The Council is generally supportive of the preferred approach set out in the MALP and the approach to the payment of Allowable Solutions from 2016. More generally the Council supports the MALP's continued commitment to the energy strategy and CO2 targets as these have proved to be largely achievable in Wandsworth to date and back-up the Council's position put forward (as set out in the Schedule of Proposed Minor Modifications) in our Local Plan Review which has now been submitted to the Inspectorate.

There remain issues with the major development definition differing with that in the Ministerial Statement as outlined above. Further clarification on both the definition and clarification on the application of Policy 5.2B is required. The Council is concerned that if, following any changes or comments the DCLG make against the Mayor's sustainability/energy approach in the MALP which results in any changes in the next iteration of the MALP, then it could leave the Wandsworth Local Plan policies on sustainable design and construction out of step and therefore unusable.

Policy 5.15 Supporting text to Policies 5.3 and 7.1: the changes are noted and there are no comments to make.

London Plan Policy 3.13 Affordable Housing Thresholds: The next iteration of the MALP should update this policy which states that boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes. The Written Ministerial Statement regarding affordable housing requirements on small sites, sets out a threshold for sites of 10-units or less, and which have a maximum combined gross floor space of 1,000 square metres, whereby affordable housing and tariff style contributions cannot be sought. This also applies to all residential annexes and extensions. Therefore Policy 3.13 should be clear that affordable housing can only be required on sites of 11 units or more which have a combined gross floorspace greater than 1,000 sq ms.

Yours sincerely

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pp Martin Howell
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