
From: Lorraine Evers
Sent: 16 June 2015 12:19
To: Jinder Ubhi
Cc: Julie Hill
Subject: FW: Housing Standards MALP

MALP

From: Lesley Gibbs
Sent: 16 June 2015 11:48
To: Mayor
Subject: Housing Standards MALP

Dear Madam/Sir

As an architect working in social housing for all of my career, I view the removal of standard 4.6.1 in the London Housing SPG a significant and discriminatory loss for affordable housing. This clause stated: *"Dwellings designed for a potential occupancy of five or more people should provide a minimum of one bathroom with WC and one additional WC."*

Originally introduced by the Housing Corporation in their Housing Quality Indicators, I regard the requirement for an additional WC and basin for families of 5 people or more as a basic essential.

In two-storey and taller dwellings (unless there is a bathroom on the entrance storey), a second WC and basin will always be provided in response to the requirements of Approved Document M4(1, 2 and 3). So the removal of this standard will have a small impact on houses and maisonettes.

In flats, however, the situation is different, as the entrance storey will always accommodate a fully-equipped bathroom. There is therefore no requirement in your proposed amendment for an additional WC/basin for larger families of 5 people or more.

Given that affordable rented homes are most likely to be fully occupied (that is, a 5-person property will be the home to 5 people), the loss of an additional WC will be keenly felt.

The proposal is discriminatory, as homes designed for private sale will almost always be provided with an additional WC/basin as an ensuite facility attached to the main bedroom.

I therefore urge you to reinstate item 4.6.1 in your MALP.

I believe that the loss of this standard in Approved Document M4 is an oversight, and have advised DCLG of this fact.

Kind regards

Lesley Gibbs

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From: Gino Seguna
Sent: 22 June 2015 12:09
To: Jinder Ubhi
Cc: Julie Hill
Subject: FW: Housing Standards MALP

From: Lesley Gibbs
Sent: 22 June 2015 12:06
To: Mayor
Subject: Re: Housing Standards MALP

Dear Madam/Sir

A further issue has come to light on a current project in relation to the application of the options within the new technical standards.

Nowhere is it stated whether there is a period of grace for projects submitted before 1 October 2015, but which will probably be determined after that date. The implication from the documentation is that planning conditions will be applied regarding the requirement for 90% M4(2) and 10% M4(3) standard dwellings, regardless of the length of the design process and the regular consultation with the planners during this time.

This problem is obviously more relevant to major projects which have been through lengthy local consultations and an iterative design process prior to a planning submission. The issue of the new AD-M (albeit still with drafting inconsistencies and lack of clarity in some items) was made on 19 May 2015. This date does not give much time for projects to anticipate the GLA's requirements and to comply with the new standards within a reasonable time.

I would therefore like to see an interregnum period of a year to 18 months in which new projects submitted for planning approval are not conditioned to include the 90% M4(2) and 10% M4(3) standard dwellings. Towards the end of that period, it would be reasonable to require full compliance with the new technical requirement and your interpretation of them.

It would be useful if a statement could be made in this respect; otherwise I can predict an avalanche of questions from architects and developers about the timing of the application of the options to the new technical standards.

Kind regards

Lesley Gibbs

On 16 June 2015, Lesley Gibbs

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