

## **Document M/20: Legacy Development Corporation Local Plan and effects of the Planning Practice Guidance and the Ministerial Statement of 25th March 2015**

On 27th March 2015 the Inspector requested clarification as to whether the Legacy Corporation considered the Secretary of State for Communities and Local Government's Ministerial Statement to have implications for the Legacy Corporation's Local Plan. Document M/19 (issued 1<sup>st</sup> April 2015) identified where those changes were considered to have an impact and suggested modifications where those were considered to be necessary.

**Subsequently, on 21st May 2015 the Inspector asked the Legacy Corporation to address the comments received from the HBF during the Main Modifications Consultation (1 April to 13 May 2015), specifically with regard to the Ministerial Statement of 25<sup>th</sup> March 2015 and the Housing Optional Technical Standards section of the national Planning Practice Guidance.**

**This document (M/20) addresses the comments from the HBF and updates M/19 in setting out how the Legacy Corporation considers that it has met the tests outlined within the Written Ministerial Statement of 25 March 2015 and the Planning Practice Guidance (PPG) in relation to Accessibility and Wheelchair Housing, Water Efficiency, and Internal Space Housing Standards. Part 1 of this document sets out this case, while Part 2 introduces a minor change that is considered to be required to Policy BN.5.**

**Parts 1 and 2 of this note have been provided in draft to the HBF to ascertain whether this further explanation and minor change would in their view provide sufficient additional information in respect of the concerns that they have raised. The HBF response to this is included at Appendix 1 to this response note.**

**Parts 1 and 2 of this note have also been reviewed by the GLA who have written to confirm that it is considered that the Local Plan, with the proposed main modifications, is in general conformity with the London Plan 2015 and with the Mayor's Housing Standards Policy Transition Statement. This Letter and the Mayor's statement are included at Appendix 2.**

While the Legacy Corporation continues to believe that the proposed main modifications to the Local Plan policies in question satisfies the relevant requirements, **Part 3** of this document sets out alternative wording to each of the policies addressed which the Legacy Corporation considers could be substituted should the inspector continue conclude that the Legacy Corporation's proposed main modifications are not sufficiently justified by the tests introduced by the ministerial statement.

## **Part 1: How the proposed main modifications are considered to have met the need and viability tests**

### **Tests**

The Written Ministerial Statement of 25 March 2015 stated that *'the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance'*.

Further to this, the PPG states (at Paragraph: 003 Reference ID: 56-003-20150327) that:

*'Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.'*

Therefore it is clear that the test for their inclusion in Local Plan's is two-fold. Firstly that Local Planning Authorities must present evidence to determine whether there is a **need** for additional standards in their area in order to justify setting appropriate policies in their Local Plans, and secondly that they should only do this where their impact on **viability** has been considered, in accordance with the NPPF.

### **Accessibility and Wheelchair housing standards (Local Plan Policy BN.5, Main Modification 21):**

The PPG (at Paragraph: 007 Reference ID: 56-007-20150327) states:

*'Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations.'*

The PPG also advises that there is a wide range of published official statistics and factors which local planning authorities **can** consider and take into account.

### **Need:**

Document M/19 justified MM21 on the basis of the evidence of need that informed London Plan (2011) Policy 3.8 B (c & d). The 'Greater London Authority's Housing Standards Review: EVIDENCE OF NEED' Report by David Lock Associates with Hoare Lea and Gardiner & Theobald (May 2015) augments the evidence of need that informed the 2011 London Plan, specifically Policy 3.8 B (c & d), which has required all new housing to be built to the Lifetime Homes standard and ten per cent of new housing to be designed to be wheelchair accessible (or easily adaptable for residents who are wheelchair users) since it was adopted in 2011.

The Legacy Corporation (as Local Planning Authority for its area) has taken this Report into account, which concludes in Section 4.3 (with regard to implementing the proposed optional access requirements M4(2) and M4(3)) that *‘there is a demonstrable need for the inclusion of M4(2) and M4(3) optional access requirements, which will ensure appropriate and accessible dwellings to serve London’* and that the proposal *‘that 90 per cent of new housing be built to the ‘accessible and adaptable dwellings’ standard (M4(2) and 10 per cent of new housing to the Building Regulation requirement M4(3) ‘wheelchair user dwellings’ is a reasonable and justified basis for the continued provision of specialist dwellings.’*

On this basis the Legacy Corporation considers that there is a demonstrable need for the inclusion of M4(2) and M4(3) optional access requirements in London as a whole, and thereby a need for M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair user dwellings) within the Legacy Corporation area.

### **Viability:**

The Publication Version of the Local Plan (August 2014) as amended through LD/26 required under Policy BN.5 that proposals for development (including residential) responded to the needs of all users, and provided an accessible and inclusive environment by incorporating all applicable elements of the Legacy Corporation’s Inclusive Design Standards (GD/1).

The Legacy Corporation’s Combined Policy Viability Study (LEB/14), which formed part of the Local Plan evidence base, identified that this policy requirement had no additional cost implications as the cost was considered to be related to the good design of schemes and therefore would be incorporated within base build costs, appropriate external works costs and professional fees.

Overall, compliance with the Inclusive Design Standards would have subjected residential development proposals to a scale of obligations and policy burdens that are greater than those which are proposed through MM21. Therefore, as the submission version of Policy BN.5 had no additional cost implications, it follows that MM21 must also have no additional cost implications for development which takes place within the Legacy Corporation area and will therefore be viable.

Further to this, as proposals for development within the Legacy Corporation area are already required to meet London Plan Policy 3.8, which is considered to set similar requirements to M4 (2) and M4 (3), development activity serves to illustrate that the requirements proposed through MM21 are currently viable.

**Please also cross refer to the ‘Other Modifications’ section at Part 2 of this document.**

**Water efficiency standards (Policy S.5/Main Modification MM38):**

The PPG (at Paragraph: 015 Reference ID: 56-015-20150327) states that it will be for a local planning authority to establish a clear need based on existing sources of evidence and consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.

**Need:**

The Legacy Corporation (as Local Planning Authority for its area) has taken into account the 'Greater London Authority's Housing Standards Review: EVIDENCE OF NEED' Report by David Lock Associates with Hoare Lea and Gardiner & Theobald (May 2015) which concludes in Section 5.5 (with regard to water efficiency) that *'Greater London is located in a water stress area. Its main water supplier, Thames Water already has a supply deficit while London's population continues to grow. Whilst it is feasible for the water companies to continue to increase supply at a cost to its customers, the installation of efficient water appliances in new residential developers has wider social, economic and environmental benefits. The proposed optional water efficiency standard is unlikely to prevent the need for further investment in other water efficiency and supply measures outlined in the water companies Water Resource Management Plans but may help to delay the need for large infrastructure measures.'*

Further to this Thames Water in their representation to the publication Local Plan (REP.LP.006) stated that *'Proposals for major development will be expected to demonstrate that they maximise opportunities to reduce water demand and use. Where feasible and viable, for domestic use, it should be demonstrated that those measures are capable of achieving a design standard of water use of less than 105 litres per person per day.'*

The Environment Agency also supported this in their representation to the publication Local Plan (REP.LP.011):

*We strongly support this policy in particular the following:*

- *Encouragement for measures to reduce potable water demand and use including grey water recycling systems, rainwater harvesting and measures to reduce domestic use to 105 litres of water per person per day or less*
- *Major proposals will be expected to demonstrate they maximise opportunities to reduce water demand and use and where feasible domestic properties achieve a design standard of 105 l/h/d*

On this basis the Legacy Corporation considers that it has established a clear need (based on existing sources of evidence and consultations with the local water and sewerage company and the Environment Agency) to meet the tighter Building Regulations optional requirement of 110 litres/person/day within the Legacy Corporation area.

## **Viability:**

The PPG (at Paragraph: 015 Reference ID: 56-015-20150327) also states that consideration of the impact on viability and housing supply of such a requirement is necessary.

The Publication Version of the Local Plan (August 2014) as amended through LD/26 required under Policy S.5 that proposals for residential development would be considered acceptable where they are capable of achieving a design standard of internal water use of 105 litres per person per day.

The Legacy Corporation Combined Policy Viability Study (LEB/14), which formed part of the Local Plan evidence base, highlighted that the NPPF identifies at para 173 that, *'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking. Plans should be deliverable'*. On the basis of the results of the study, BNP Paribas Real Estate considered that with the exception of Policies S.2 and S.4, the Local Plan's sustainability policies (including Policy S.5) had built in an appropriate level of flexibility where they had potential cost implications. It is therefore clear that the Legacy Corporation has considered the impact of MM38 on viability through LEB/14.

Further to this, proposals for development within the Legacy Corporation area are already required to meet London Plan Policy 5.15 B (b) which states that *'Development should minimise the use of mains water by designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day'*. Development activity within the Legacy Corporation area serves to illustrate that the requirements proposed through MM38 are already viable and are not impacting housing supply.

## **Internal space standards (Policy BN.4/Main modification MM.20):**

The PPG (at Paragraph: 020 Reference ID: 56-020-20150327) states:

Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

**Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

**Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

**Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.

**Viability:**

The Publication Version of the Local Plan (August 2014) as amended through LD/26 stated under Policy BN.4 that proposals for residential development would be considered acceptable where residential elements met the 'Baseline' Quality and Design Standards outlined within Annex 1 of the Mayor of London's Housing Supplementary Planning Guidance (November 2012), including any future revisions or superseding guidance. This is Core Document (RP/7).

Baseline Standard 4.1.1 required all residential developments to meet the minimum space standards set out in Table 3.3 of the London Plan (2015).

The Legacy Corporation Combined Policy Viability Study (LEB/14), which formed part of the Local Plan evidence base, identified that this policy requirement had no additional cost implications as the cost was considered to be related to the good design of schemes and therefore would be incorporated within base build costs, appropriate external works costs and professional fees.

The effect of MM20 is that proposals to develop 2 bedroom, 3 bedroom and 4 bedroom two storey homes and 3 bedroom and 4 bedroom three storey homes will be acceptable if they propose dwelling sizes lower (2.5 square metres on average) than those required by Baseline Standard 4.1.1. The size requirements for single storey dwellings remain unchanged.

Hence, as compliance with Baseline Standard 4.1.1 would have subjected residential development proposals to a scale of obligations and policy burdens that are greater than those which are proposed through MM20, it follows that MM20 must also have no additional cost implications and will therefore be viable.

Further to this, development activity within the Legacy Corporation area serves to illustrate that the requirements proposed through MM20 are viable, as proposals for development within the Legacy Corporation area are already required to meet the requirements of London Plan Policy 3.5 (C) (which replicates Baseline Standard 4.1.1).

**Need:**

Document M/19 justified MM20 on the basis of the evidence of need that informed London Plan (2011) Policy 3.5 C. The 'Greater London Authority's Housing Standards Review: EVIDENCE OF NEED' Report by David Lock Associates with Hoare Lea and Gardiner & Theobald (May 2015) augments the evidence of need that informed the July 2011 London Plan, specifically Policy 3.5 C, which has required all new housing to generally conform with London Plan Table 3.3 (Minimum space standards for new development) since it was adopted in 2011.

The Legacy Corporation (as Local Planning Authority for its area) has also taken this Report into account, which concludes in Section 3.4 (with regard to London Specific Rational for Space Standards) that this evidence *'indicates a clear need to provide adequate space in new development in London. The justification for providing housing standards, including minimum space sizes, ceiling heights and bedroom sizes remains as compelling as when*

*the standards were first established. They rightly recognise that the proper provision of space for residents ensures a better standard of living and quality of life’.*

Furthermore, the London Development Database (LDD) is the key data source for monitoring planning approvals and completions in London, including the Legacy Corporation Area. Permission data is entered by the Legacy Corporation for all full or outline planning permissions granted that propose any new build residential units or any loss or gain of residential units through change of use or conversion of existing dwellings. Data associated with these records demonstrates that dwellings are currently being built in the Legacy Corporation area that meet London Plan Policy 3.5 (C) (i.e. two and three storey dwellings that are larger than those required by MM20).

On this basis the Legacy Corporation considers that there is a demonstrable need for requiring the Nationally Described Space Standards within the Legacy Corporation area.

### **Timing:**

The Legacy Corporation considers that there is no need for there to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions as developers are already subjected to a scale of obligations and policy burdens (via London Plan Policy 3.5) that are greater than those which are proposed through MM20.

### **Conclusion**

Through this note the Legacy Corporation has demonstrated that by incorporating accessibility and wheelchair housing, water efficiency, and internal space housing standards in its Local Plan it is addressing a clearly evidenced need and that it has also considered the impact of incorporating these standards through its Local Plan viability assessment (LEB/14). In each case neither the justification for need nor the impact on viability of the policy approach specifically relies on the relevant Minor Alterations to the London Plan or the evidence relating to this. Such evidence is reference only for the purposes of context. In respect of Policy BN.5 a further minor change is considered necessary to ensure consistency with the approach proposed within the Minor Alterations to the London Plan (May 2015).

## **Part 2: Other Modifications**

In order to fully reflect the revisions to the proposed Minor Alterations to London Plan (May 2015) Policies 3.5 and 3.8 with regard to Housing Standards, the Legacy Corporation proposes the following additional '**Other Modifications**' for the reasons outlined below.

### **Further amendments to MM21:**

Since the publication of the proposed Minor Alterations to London Plan the Legacy Corporation has concluded that the reference to 'Regulation 4 (3) 2 (b)' is in fact superfluous due to the fact that Regulation 4 (3) 2 (b) falls under Optional Requirement M4 (3) Category 3 of Part M of the Building Regulations. Therefore this reference adds unnecessary duplication to Policy BN.5 and should be removed. **As this change is proposed for the purposes of clarification, it is not considered to address issues of soundness or be a main modification.**

### **Proposed change**

Deletion of the following text: ~~Regulation 4 (3) 2 (b) of~~

#### **Amend Policy BN.5 to read**

Non-residential pProposals will be considered acceptable where they respond to the needs of all users, and provide an accessible and inclusive environment by incorporating all applicable elements of the Legacy Corporation's Inclusive Design Standards.

Residential proposals will be considered acceptable where they respond to the needs of all users, and provide an accessible and inclusive environment by providing 90 % of dwellings in accordance with Optional Requirement M4 (2) Category 2 of Part M of the Building Regulations, and 10% of dwellings in accordance with ~~Regulation 4 (3) 2 (b) of~~ Optional Requirement M4 (3) Category 3 of Part M of the Building Regulations.

The relevant elements of the Mayor of London's Housing Supplementary Planning Guidance (November 2012)("Annex 1 Baseline Standards"), will only be applied where they are equivalent to the Optional Requirements in Part M of the Building Regulations(as applied by this policy).

### **Further amendments to MM11:**

The Legacy Corporation is also proposing to correct factual errors within Paragraph 5.12. This is to clarify that optional requirements do not form part of the Nationally Described Space Standards - Technical Requirements. **As this change is proposed for the purposes of clarification, it is not considered to address issues of soundness or be a main modification.**

### **Proposed change**

**Amend Paragraph 5.12 to read:** ....Policies BN.4 and BN.5 set out how the Baseline Standards within the Mayor's Housing SPG will be applied alongside optional requirements ~~of and~~ the Nationally Described Space Standards - Technical Requirements. ~~in relation to space and accessibility standards~~. The London Plan's density matrix.....



## REFERENCES:

Greater London Authority's Housing Standards Review: EVIDENCE OF NEED - <http://www.london.gov.uk/sites/default/files/Housing%20Standards%20Evidence%20of%20need.pdf>

Legacy Corporation's Combined Policy Viability Study (Document LEB/14) <http://queenelizabetholympicpark.co.uk/~media/lldc/local%20plan/local%20plan%20examination%20documents/local%20evidence%20base%20documents/leb14%20local%20plan%20viability%20testing%20report%20final%205june14.pdf>

## **Part 3: Alternative suggested changes**

Should the inspector not consider the justification of the modifications to these policies to be adequate to demonstrate that need and viability have been adequately shown and that these, with the further minor proposed change, are consistent with the proposed changes to the equivalent policies within the London Plan, it is requested the following alternative wording be considered. This would ensure direct reference to the relevant London Plan policies and requirements of those policies both as they currently stand (with the Mayor's Housing Standards Transition Statement) and by referring to those policies ensuring that the requirements of those policies will be relevant when the current proposed minor alterations to the London Plan have been published in their final form. It should, however, be noted that should the proposed minor alterations to the London Plan be published unchanged in their final form, there would be no material difference between these and the Legacy Corporation Local Plan policies as amended by the proposed main modifications as set out in this note.

Changes are highlighted in yellow with new text underlined and removed text struck through (where Main Modification text has been struck through it also remains underlined)

### **Policy BN.4**

All residential development will be required as a minimum to meet the requirements of London Plan Policy 3.5 (Quality and Design of Housing Developments), including the space standards set out in its accompanying Table 3.3 (Minimum Space Standards for New Development) ~~Nationally Described Space Standards – Technical Requirements~~. Proposals will be considered acceptable where residential elements meet the 'Baseline' Quality and Design Standards outlined with Annex 1 of the Mayor of London's Housing Supplementary Planning Guidance (November 2012)("Annex 1 Baseline Standards"), including any future revisions or superseding guidance save that the following elements of Annex 1 Baseline Standards shall not apply:

1. To any elements of the Annex 1 Baseline Standards that are addressed by the ~~Nationally Described Space Standards – Technical Requirements~~ unless they are equivalent.
2. Any elements of the Annex 1 Baseline Standards that are addressed by other policies in this Plan.

## Policy BN.5

Non-residential pProposals will be considered acceptable where they respond to the needs of all users, and provide an accessible and inclusive environment by incorporating all applicable elements of the Legacy Corporation's Inclusive Design Standards.

Residential proposals will be considered acceptable where they respond to the needs of all users, and can demonstrate that such provision is made in accordance with the requirements of London Plan Policy 3.8 (Housing Choice) provide an accessible and inclusive environment by providing 90 % of dwellings in accordance with Optional Requirement M4 (2) Category 2 of Part M of the Building Regulations, and 10% of dwellings in accordance with Regulation 4 (3) 2 (b) of Optional Requirement M4 (3) Category 3 of Part M of the Building Regulations.

The relevant elements of the Mayor of London's Housing Supplementary Planning Guidance (November 2012)("Annex 1 Baseline Standards"), will only be applied where they are equivalent to the Optional Requirements in Part M of the Building Regulations(as applied by this policy).

## Paragraph 6.20

In order to promote the creation of inclusive places, developers will be encouraged to engage with the individuals who will use those places when designing their proposals. Applicants for non-residential development must reference the Legacy Corporation's Inclusive Design Standards within their Design and Access Statements in order to demonstrate how they have been met and incorporated within their proposals. Applicants for residential development must set out how the requirements of London Plan Policy 3.8 (Housing Choice) reference Category 2 and Category 3 Optional Requirements within their Design and Access statements in order to demonstrate how they have been met and incorporated, and are encouraged to also reference the Legacy Corporation's Inclusive Design Standard. This will help deliver the highest standards of inclusive design and more usable and openly accessible urban environments, both within and outside Queen Elizabeth Olympic Park.

## Policy S.5

(Second paragraph) Proposals for major development will be expected to demonstrate that they maximise opportunities to reduce water demand and use. Where feasible and viable, for domestic use it should be demonstrated that those measures are capable of achieving a design standard of water use of equivalent to or less than the amount 105 110 litres per person per day identified within London Plan Policy 5.15 (Water Use and Supplies) (including an external water use of 5 litres of water per person per day).

## Appendix 1: HBF Letter of 4<sup>th</sup> June 2015



### London Legacy Development Corporation Local Plan

#### Main Mods: MM11, MM20, MM21, MM23, MM38

We have considered the inspector's note dated 21 May 2015. We have noted the LLDC's response contained in Document M/20. Unfortunately the Corporation's response does not allay our concerns. There are important procedural issues in terms of the timing and examination of the new London Plan that means that it will not be possible for the LLDC to adopt the new construction standards that are being proposed by the London Plan in advance of this new plan being examined and found sound.

In addition, the LLDC cannot require compliance with the Mayor's draft SPG that sets construction standards that have yet to be found sound through the examination of the MALP. To do so would also conflict with paragraph 153 of the NPPF.

LLDC cannot adopt the construction standards in the London Plan including the Optional Technical Standards because the London Plan (Minor Alterations to the London Plan – MALP) itself has yet to be tested at examination. The inspector who will be appointed to examine that plan will need to be confident that the relevant tests set out in the Written Ministerial statement of 25 March 2015 and the accompanying new chapter of the PPG have been met and satisfied.

The LLDC's defence, as explained in document M/20, relies primarily on arguments and evidence produced by the GLA to support the MALP consultation – namely the *Evidence of Need* paper and the *Viability Assessment* report. The HBF is currently preparing its representations in response to the MALP consultation. Having carefully considered this supporting evidence the HBF has a number of misgivings – in terms of the evidence itself and some of the GLA's reasoning. This covers matters relating to the viability modelling, the viability assumptions, omissions from the viability modelling, the lack of cognisance given to some of the actual results of the viability modelling, and the wording of some of the policies.

I will summarise below some of the HBF's main areas of concern.

In terms of the Nationally Described Space Standard, which the LLDC wishes to adopt through Policy BN.4, we are concerned that the GLA has not attempted to assess the effect of this policy on housing affordability. This is an important element of the viability test as set out in the PPG in paragraph ID 56-020-20150327.

There is also the matter of Starter Homes. In terms of the Nationally Described Space Standard the PPG advises within the 'need' test that "*evidence should be*

*provided on the size and type of dwellings currently being built in the area to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.” (my emphasis).*

The GLA has not considered how the adoption of the Nationally Described Space Standard might affect the Government’s Starter Homes initiative. This initiative was conceived as a response to the pressing problem of housing affordability. Affordability is a major problem in London. The GLA acknowledges this in the evidence for the MALP. This is the reason why the GLA supports the company Pocket Homes and allows it to build homes that are smaller than the current London Space Standard. As we have argued in our representations on the MALP the GLA will need to consider the consequences of adopting this optional standard on Starter Homes and on affordability. We consider that the GLA should provide more evidence to show that the size of dwellings is more of an issue for households in housing need in London than the problem of affordability. If the LLDC wishes to adopt the Nationally Described Space Standard in advance of the MALP then it will need to address these matters.

In terms of Part M4(2) – accessible and adaptable dwellings that the LLDC wishes to adopt through policy BN.5 we are very concerned about the GLA’s decision not to assess the cost of adopting this optional Building Regulation despite the GLA acknowledging that this could have a significant effect on viability. Paragraph 4.2.15 of the *Evidence of Need* report refers to the implications of adopting Parts M4(2). The report acknowledges that while the current London Plan specifies Lifetime Homes this does not require the provision of step-free access in all developments. It observes that the policy will have particular implications for three and four storey blocks of flats and stacked maisonettes (this observation is repeated in paragraph 3.48A of the MALP).

Paragraph 3.4 of the *Viability Assessment* confirms that the cost of M4(3) has been omitted as part of the exercise. This is unjustified and contrary to the NPPF and the PPG tests. We note that the table on page 15 of the report indicates that the cost of complying with M4(3) is potentially very high – it is much higher than the cost normally allowed for complying with Lifetime Homes (the current London Plan policy) which was previously typically estimated to cost between £500 and £1,600 depending on dwelling type – houses were cheaper than flats (see the DCLG report titled *Assessing the Cost of Lifetime Homes Standards*, DCLG, July 2012).

We have also raise a number of questions with the GLA about how Part M4(2) and Part M4(3) will be applied in determining planning applications as the policy is not altogether clear.

It should also be noted that Part M4(3) can only be sought as part of the affordable housing element (PPG ID 56-011). The MALP is unclear on this question. A scheme providing no affordable housing (for whatever reason), therefore, would not need to provide 10% of the units as wheelchair housing.

In terms of water efficiency the GLA has not assessed the cost of this tighter standard despite this being a requirement of the NPPF and the PPG. We are also

questioning the way the GLA has chosen to express this policy in the MALP because the optional standard only requires an efficiency of 110 lpppd whereas the MALP and LLDC policy S.5 require an efficiency of 105 lpppd.

If the LLDC wishes to adopt the Optional Technical Standards in advance of the MALP being found sound, it will need to prepare its own viability evidence and address the other tests relating to necessity and affordability that the GLA, we would argue, has neglected.

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I am sorry that I cannot be more positive at this stage but ensuring that the correct process is adhered to and the relevant tests have been met is essential if the new standards regime is to achieve the confidence of all relevant parties including the development industry.

Yours sincerely

**James Stevens, MRTPI**  
**Strategic Planner**

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**Appendix 2: Greater London Authority Letter of 28<sup>th</sup> May 2015 and the Mayor's Housing Standards Transition Statement**

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

**Alex Savine**

Planning Policy and Decisions Team  
London Legacy Development Corporation  
Level 10, 1 Stratford Place  
Montfichet Road  
London E20 1EJ

**Our ref:** LDF39/LDD01/EK02  
**Date:** 28 May 2015

Dear Mr Savine,

**London Legacy Development Corporation Local Plan – Publication version (August 2014) and proposed modifications**

**Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)**

Thank you for requesting an opinion on general conformity with the London Plan from the Mayor of London for the above Local Plan documents. The Mayor has delegated authority to me to respond. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

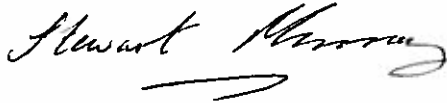
On 6 October 2014 the Mayor provided a letter confirming the London Legacy Development Corporation's Local Plan Publication Version DPD was in general conformity with the London Plan, reference D&P/LDF39/LDD01/EK. Following the examination hearings on the submitted Local Plan the London Legacy Development Corporation (LLDC) published proposed modifications to the Plan in April 2015 (Ref. LD/31). In response to recent correspondence with the examination Inspector (Ref.ID/21) the LLDC have produce a document M/20: Legacy Development Corporation Local Plan and effects of the Planning Practice Guidance and the Ministerial Statement of 25th March 2015.

On 10 March 2015, the Mayor published the Further Alterations to the London Plan (FALP) and this is now referred to as the London Plan 2015. On 25 March 2015 through a written ministerial statement, the Government introduced new technical housing standards in England and detailed how these would be applied through planning policy. The Mayor intends to adopt the new national technical standards through a minor alteration to the London Plan. In advance of this, as required by Government, the Mayor published a Housing Standards Policy Transition Statement (May 2015) which sets out how the existing policies relating to Housing Standards in the London Plan should be applied from October 2015.

It is my opinion that the London Legacy Development Corporation Local Plan – Publication version with the proposed modifications is in general conformity with the London Plan 2015 and is in accordance with the Mayor's Housing Standards Policy Transition Statement.

If you would like to discuss any of my representations please contact Elliot Kemp (020 7983 4908) who will be happy to discuss.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stewart Murray', with a horizontal flourish underneath.

**Stewart Murray**  
**Assistant Director – Planning**

cc Jennette Arnold, London Assembly Constituency Member  
John Biggs, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL



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# **HOUSING STANDARDS POLICY TRANSITION STATEMENT**

## **IMPLEMENTATION: OCTOBER 2015**

May 2015

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## MAYOR OF LONDON

### Housing Standards: Transition Policy Statement.

On 25 March 2015 through a written ministerial statement, the Government introduced new technical housing standards in England and detailed how these would be applied through planning policy<sup>1</sup>. The system comprises of new additional 'optional' Building Regulations on water and access, and a nationally described space standard<sup>2</sup> (referred to as "the new national technical standards").

These new standards will come into effect on the 1st of October 2015. From this date relevant London Plan policy and associated guidance in the Housing Supplementary Planning Guidance (SPG) should be interpreted by reference to the nearest equivalent new national technical standard. The Mayor intends to adopt the new national technical standards through a minor alteration to the London Plan. In advance of this, as required by Government, this Policy Statement sets out how the existing policies relating to Housing Standards in the London Plan should be applied from October 2015. Appendix 1 sets out how the relevant standards in the Housing SPG should be interpreted from October 2015. This is also set out in the Draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

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<sup>1</sup>Written Ministerial Statement – The Rt Hon Eric Pickles March 2015 'Steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision making'

<sup>2</sup> DCLG Technical housing standards – nationally described space standard. DCLG 2015

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### Policy 3.5 Quality and Design of Housing Developments

3.5 C currently states "*LDFs should incorporate minimum space standards that generally conform with Table 3.3. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat', have adequately sized rooms and convenient and efficient room layouts, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process*". From October 2015 Table 3.3 should be substituted with Table 1 of the nationally described space standard. For detailed guidance on implementation see Appendix 1 which sets out how the standards stemming from this policy set out in the 2012 Housing SPG should be interpreted in relation to the Government's standards.

### Policy 3.8 Housing Choice:

3.5 c – *requires all new homes to be built to lifetime homes standards*. From October 2015 this should be interpreted as 90% of homes should meet building regulation M4 (2) – 'accessible and adaptable dwellings'.

3.5 d – *requires ten per cent of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users*. From October 2015 this should be interpreted as requiring ten per cent of new housing to meet building regulation M4 (3) 'wheelchair user dwellings'.

## **Policy 5.2 Minimising Carbon Dioxide Emissions**

Policy 5.2 should continue to be applied. The Mayor has considered the Government's intentions regarding energy performance standards for domestic development and its support for low carbon energy infrastructure, and considers his energy targets within his energy hierarchy to be in line with this approach. Appendix 1 recalibrates the London Plan's energy target to a target expressed in 2013 Building Regulations terms.

**From now until the end of September 2015, the current London Plan standards apply.**

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**APPENDIX 1 HOW RELEVANT LONDON PLAN AND ASSOCIATED SPG STANDARDS SHOULD BE INTERPRETED FROM OCTOBER 2015**

<b>Existing Standard</b>		<b>Standard from October based on nearest equivalent national technical standard</b>
<b>3.1</b>	<b>Entrance and approach</b>	
3.1.2	The distance from the accessible car parking space of requirement 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be level or gently sloping.	The distance from the accessible car parking space of standard 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum.
3.1.3	The approach to all entrances should preferably be level or gently sloping.	Approach routes should comply with the requirements of Part M4(2) <sup>3</sup> , unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3) <sup>4</sup> .
3.1.4	All entrances should be illuminated and have level access over the threshold, Entrance doors should have 300mm of clear space to the pull side, and clear minimum opening widths of 800mm or 825mm depending on the direction and width of approach. Main entrances should have weather protection and a level external landing.	All entrances should comply with the requirements of Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).
<b>3.2</b>	<b>Shared circulation within buildings</b>	
3.2.4	The minimum width for all paths, corridors and decks for communal circulation should be 1200mm. The preferred minimum width is 1500mm, and is considered particularly important where corridors serve dwellings on each side ('double loaded') and where wheelchair accessible dwellings are provided.	Communal circulation should comply with Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).

<sup>3</sup> Requirement M4(2) of Schedule 1 to the Building Regulations 2010.HM Government 2015.

<sup>4</sup> Requirement M4(3) of Schedule 1 to the Building Regulations 2010.HM Government 2015

Existing Standard		Standard from October based on nearest equivalent national technical standard
3.2.5	For buildings with dwellings entered from communal circulation at the first, second or third floor where lifts are not provided, space should be identified within or adjacent to the circulation cores for the future installation of a wheelchair accessible lift.	Standard removed
3.2.6	All dwellings entered at the fourth floor (fifth storey) and above should be served by at least one wheelchair accessible lift, and it is desirable that dwellings entered at the third floor (fourth storey) are served by at least one such lift. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.	Every M4(2) dwelling should be provided with step-free access. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.
3.2.7	Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift. It is desirable that every wheelchair accessible dwelling is served by more than one lift.	Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift <sup>5</sup> . It is desirable that every wheelchair accessible dwelling is served by more than one lift.
3.2.8	Principal access stairs should provide easy access regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible.	Principal access stairs should provide easy access <sup>6</sup> regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible <sup>7</sup> .
<b>3.3</b>	<b>Car parking</b>	
3.3.2	Each designated wheelchair accessible dwelling should have a car parking space 2400mm wide with a clear access way to one side of 1200mm.	Each designated wheelchair user dwelling should have a car parking space that complies with Part M4 (3) 3.12 a-e.

<sup>5</sup> Compliant with the requirements of Part M4 (3)

<sup>6</sup> Part K (Protection from falling, collision and impact) requirements for a general access stair.

<sup>7</sup> Compliant with the requirements of Part M4 (2)

<b>Existing Standard</b>		<b>Standard from October based on nearest equivalent national technical standard</b>
3.3.4	Where car parking is within the dwelling plot, at least one car parking space should be capable of enlargement to a width of 3300mm. Where parking is provided in communal bays, at least one space with a width of 3300mm should be provided per block entrance or access core in addition to spaces designated for wheelchair user dwellings.	Where a dwelling has car parking within its plot, at least one parking space should comply with Part M4(2). Where parking is provided in communal bays, at least one space should be provided per block entrance or access core that complies with Part M4(3) in addition to spaces designated for wheelchair user dwellings.
<b>3.5</b>	<b>Refuse, post and deliveries</b>	
3.5.1	Communal refuse and recycling containers, communal bin enclosures and refuse stores should be accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection and should achieve full credits under the Code for Sustainable Homes Technical Guide. Refuse stores within buildings should be located to limit the nuisance caused by noise and smells and provided with means for cleaning.	Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.
3.5.2	Storage facilities for waste and recycling containers should be provided in accordance with the Code for Sustainable Homes Technical Guide and local authority requirements.	Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.

Existing Standard	Standard from October based on nearest equivalent national technical standard		
4.0			
4.1			
4.1.1	All developments should meet the following minimum space standards (as set out in Table 3.3 of the replacement LP):		
		<b>dwelling type (bedroom/ persons)</b>	<b>essential gia (sqm)</b>
	Flats	1p	37
		1b2p	50
		2b3p	61
		2b4p	70
		3b4p	74
		3b5p	86
		3b6p	95
		4b5p	90
		4b6p	99
		Two storey houses	2b4p
	3b4p		87
	3b5p		96
	4b5p		100
	4b6p		107
	Three storey houses	3b5p	102
		4b5p	106
		4b6p	113
	For dwellings designed for more than 6 people, at least 10sq.m gross internal area should be added for each additional person.		

Existing Standard	Standard from October based on nearest equivalent national technical standard			
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All developments should meet the following minimum space standards (as set out in Table 3.3 of the London Plan and the nationally described space standards).

bedrooms	bedspaces	minimum gia (sqm)			built-in storage (sqm)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

\*Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m<sup>2</sup> to 37m<sup>2</sup>, as shown bracketed.

The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m<sup>2</sup>).

4.2	Flexibility and adaptability	
4.2.1	Dwelling plans should demonstrate that dwelling types provide flexibility by showing that at least one bedroom is capable of being used and furnished as either a double or a twin room according to occupiers' preferences.	Standard removed



Existing Standard		Standard from October based on nearest equivalent national technical standard								
<b>4.3</b>	<b>Circulation in the home</b>									
4.3.1	<p>The minimum width of hallways and other circulation spaces inside the home should be 900mm. This may reduce to 750mm at ‘pinch points’ e.g. next to radiators, where doorway widths meet the following specification:</p> <table border="1"> <thead> <tr> <th>MINIMUM CLEAR OPENING WIDTH OF DOORWAY (mm)</th> <th>MINIMUM WIDTH OF HALLWAY WHERE DOOR IS IN SIDE WALL (mm)</th> </tr> </thead> <tbody> <tr> <td>750</td> <td>1200</td> </tr> <tr> <td>775</td> <td>1050</td> </tr> <tr> <td>900</td> <td>900</td> </tr> </tbody> </table> <p>Where a hallway is at least 900mm wide and the approach to the door is head-on, a minimum clear opening door width of 750mm should be provided.</p>	MINIMUM CLEAR OPENING WIDTH OF DOORWAY (mm)	MINIMUM WIDTH OF HALLWAY WHERE DOOR IS IN SIDE WALL (mm)	750	1200	775	1050	900	900	The minimum width of hallways and other circulation spaces inside the home should comply with Part M4(2).
MINIMUM CLEAR OPENING WIDTH OF DOORWAY (mm)	MINIMUM WIDTH OF HALLWAY WHERE DOOR IS IN SIDE WALL (mm)									
750	1200									
775	1050									
900	900									
4.3.2	The design of dwellings of more than one storey should incorporate potential for a stair lift to be installed and a suitable identified space for a through-the-floor lift from the entrance level to a storey containing a main bedroom and an accessible bathroom.	The design of dwellings of more than one storey should incorporate potential for a future stair lift to be installed by providing stairs that complies with M4(2).								

Existing Standard		Standard from October based on nearest equivalent national technical standard												
<b>4.4</b>	<b>Living / dining / kitchen</b>													
	The following combined floor areas for living / kitchen / dining space should be met:	Standard removed												
	<table border="1"> <thead> <tr> <th>DESIGNED LEVEL OF OCCUPANCY</th> <th>MINIMUM COMBINED FLOOR AREA OF LIVING, DINING AND KITCHEN</th> </tr> </thead> <tbody> <tr> <td>2 PERSON</td> <td>23</td> </tr> <tr> <td>3 PERSON</td> <td>25</td> </tr> <tr> <td>4 PERSON</td> <td>27</td> </tr> <tr> <td>5 PERSON</td> <td>29</td> </tr> <tr> <td>6 PERSON</td> <td>31</td> </tr> </tbody> </table>	DESIGNED LEVEL OF OCCUPANCY	MINIMUM COMBINED FLOOR AREA OF LIVING, DINING AND KITCHEN	2 PERSON	23	3 PERSON	25	4 PERSON	27	5 PERSON	29	6 PERSON	31	
DESIGNED LEVEL OF OCCUPANCY	MINIMUM COMBINED FLOOR AREA OF LIVING, DINING AND KITCHEN													
2 PERSON	23													
3 PERSON	25													
4 PERSON	27													
5 PERSON	29													
6 PERSON	31													
4.4.2	The minimum width of the main sitting area should be 2.8m in 2-3 person dwellings and 3.2m in dwellings designed for four or more people.	Standard removed												
4.4.3	Dwellings for five people or more should be capable of having two living spaces, for example a living room and a kitchen-dining room. Both rooms should have external windows. If a kitchen is adjacent to the living room, the internal partition between the rooms should not be load-bearing, to allow for reconfiguration as an open plan arrangement. Studies will not be considered as second living spaces.	Standard removed												
4.4.5	A living room, living space or kitchen dining room should be at entrance level.	A living area that complies with M4(2) should be at entrance level.												
4.4.6	Windows in the principal living space should be no higher than 800mm above finished floor level (+/- 50mm) to allow people to see out while seated. At least one opening window should be easy to approach and operate by people with restricted movement and reach.	Glazing to the principal window should comply with Part M4(2). At least one opening window in the principal living area should comply with Part M4(2).												

Existing Standard		Standard from October based on nearest equivalent national technical standard
<b>4.5</b>	<b>Bedrooms</b>	
4.5.1	The minimum area of a single bedroom should be 8 sq m. The minimum area of a double or twin bedroom should be 12 sq m.	The minimum area of a single bedroom should be 7.5sqm. The minimum area of a double or twin bedroom should be 11.5sqm to comply with the nationally described space standard.
4.5.2	The minimum width of double and twin bedrooms should be 2.75m in most of the length of the room.	One double or twin bedroom should be at least 2.75m wide and every other double or twin should be at least 2.55m wide, in most of the length of the room, to comply with the nationally described space standard.
4.5.3	In homes of two or more storeys with no permanent bedroom at entrance level, there should be space on the entrance level that could be used as a convenient temporary bed space.	Standard removed
4.5.4	Building structure above a main bedroom and an accessible bathroom should be capable of supporting a ceiling hoist and the design should allow for a reasonable route between this bedroom and bathroom.	Standard removed
<b>4.6</b>	<b>Bathrooms and WCs</b>	
4.6.1	Dwellings designed for a potential occupancy of five or more people should provide a minimum of one bathroom with WC and one additional WC.	Standard removed
4.6.2	Where there is no accessible bathroom at entrance level, a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level.	To provide step-free access to a WC that is suitable and convenient to some wheelchair users and, where reasonable, to make provision for showing, dwellings should comply with the requirements of Part M4(2).
4.6.3	An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom.	An accessible bathroom that complies with Part M4(2) should be provided in every dwelling on the same storey as a double (or twin) bedroom.
4.6.4	Walls in bathrooms and WCs should be capable of taking adaptations such as handrails.	Walls in the bathrooms and WCs should be capable of taking adaptations and comply with Part M4(2).

<sup>8</sup> Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the accessible threshold standard.

<b>Existing Standard</b>		<b>Standard from October based on nearest equivalent national technical standard</b>
<b>4.7</b>	<b>Storage and utility</b>	
4.7.1	In dwellings supported by the LDA or receiving public subsidy, built-in general internal storage space free of hot water cylinders and other obstructions, with a minimum internal height of 2m and a minimum area of 1.5 sq m should be provided for 1 and 2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5 sq.m of storage space is required.	Built-in general internal storage space should be provided to comply with Table 3.3 of the LP, and the nationally described space standard 4.1.
<b>4.8</b>	<b>Study and work</b>	
4.8.1	Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home.	Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home.
4.8.2	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner.	Service controls should be within easy reach and comply with Part M4(2).
<b>4.9</b>	<b>Wheelchair accessible dwellings</b>	
4.9.1	Ten percent of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users in accordance with the GLA Best Practice Guide on Wheelchair Accessible Housing.	Ten percent of new housing should be designed to be wheelchair user dwellings that comply with Part M4(3).
<b>4.10</b>	<b>Private open space</b>	
4.10.2	Private outdoor spaces should have level access from the home.	All private outdoor space should have accessible threshold from the home <sup>9</sup> ,
<b>5.0</b>	<b>Home as a Place of Retreat</b>	
<b>5.3</b>	<b>Noise</b>	
5.3.1	The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.	The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.

<sup>9</sup> Excluding an allowance of 5 litres or less per head per day for external water use (as set out in the 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010 )

Existing Standard		Standard from October based on nearest equivalent national technical standard
<b>5.4</b>	<b>Floor to ceiling heights</b>	
5.4.1	The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level.	To address the unique heat island effect of London and the distinct density and flatted nature of most of London's residential development, a minimum ceiling height of 2.5m for at least 75% of the dwelling area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.
<b>5.6</b>	<b>Air Quality</b>	
5.6.1	Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality: be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).	Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
<b>6.0</b>	<b>Climate Change Adaptation</b>	
6.1.1	Designers should seek to achieve a minimum of Level 4 of the Code for Sustainable Homes in all new developments.	Standard removed
<b>6.2</b>	<b>Energy and CO2</b>	
6.2.1	Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction. Year Improvement on 2010 Building Regulations 2010 - 2013 25 per cent 2013 - 2016 40 per cent 2016 - 2031 Zero carbon	Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction. Year Improvement on 2013 Building Regulations 2014 - 2016 35 per cent 2016 - 2036 Zero carbon
<b>6.4</b>	<b>Water</b>	
6.4.1	New dwellings should be designed to ensure that a maximum of 105 litres of water is consumed per person per day.	New dwellings should be designed to ensure that a maximum of 105 <sup>9</sup> litres of water is consumed per person per day.

<b>Existing Standard</b>		<b>Standard from October based on nearest equivalent national technical standard</b>
6.4.2	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with PPS25.	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with the NPPF and its associated technical Guidance <sup>10</sup> .
<b>6.5</b>	<b>Materials</b>	
6.5.1	All new residential development should accord with Code for Sustainable Homes Level 4 and the London Sustainable Design and Construction SPG with regard to the sourcing of materials.	Developments should manage existing materials, specify sustainable materials that are robust and fit for purpose and secure the sustainable procurement of materials.
6.5.2	All new residential development should meet the requirements of the Code Level 4 with regard to using materials with lower environmental impacts over their lifecycle.	Standard removed

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### Chinese

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### Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

### Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

### Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

### Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

### Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

### Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

### Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

### Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

### Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

**MAYOR OF LONDON**