

Jinder Ubhi

From: Ian Mayhead <imayhead@iceniprojects.com>
Sent: 16 November 2015 16:48
To: EIP Secretary
Cc: David Churchill
Subject: RE: MALP Actions arising from EIP

Follow Up Flag: Follow up
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Dear Carmel Edwards

Thank you for the opportunity to make further comment in relation to the Note from the Mayor on post-EiP action points. Our comments specifically relate to Action point 11 (approach to space standards and covenanted PRS), paragraphs 24 and 25. These paragraphs highlight that, in the Mayor's view, there is "sufficient flexibility" in the plan and supplementary guidance as drafted.

Our significant concerns with the current wording remain, and in our view it is critical that the wording is made explicit, stating that the space standards should be applied flexibly. This needs to be written into the Policy itself and not simply left to the LPAs to interpret this when considering planning applications. The wording as currently drafted could be interpreted differently across the LPAs, with the resultant lack of consistency across London.

Of particular concern is the reference to the units being "demonstrably of exemplary design" in Policy 3.5, and the reference in the SPG to them being of "exceptional standard". As identified above, these are subjective terms that will result in inconsistencies in interpretation by LPAs across London. PRS by its very nature is intended to cater for the housing needs of a wide range of occupiers, and whilst it will be a high quality product it is unlikely to pass the test of being "exceptional". This hurdle is one that residential proposals, including PRS, should not be expected to clear. Paragraph 25 of the Note from the Mayor suggests that flexibility should be reserved for circumstances where "it can be proved that the design is of **good** quality" [our emphasis]. This is not reflected in the wording of the policy or the wording of the guidance, and this should be rectified prior to the adoption of the Plan.

In summary, it is agreed that the standards should be applied flexibly in the case of good design; however, exceptional design is too high hurdle to overcome. We are committed to working with the Mayor to enhance his understanding of the PRS model and how it can work for London, and are grateful for the opportunity to respond to these further comments.
I would be grateful of confirmation of receipt by reply.

Kind regards

Ian

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From: EIP Secretary <EIPSecretary@london.gov.uk>
Date: 2 November 2015 at 12:24:46 GMT
To: EIP Secretary <EIPSecretary@london.gov.uk>
Subject: MALP Actions arising from EIP

Dear Respondent

Please find attached notes and further suggested changes produced by the GLA in response to requests from the inspector during the EIP.

As announced at the EIP Mr Hogger invites comments on this further work. Any comments should be sent to the EIP Secretary by 5pm on Monday 16th November. Only comments on this work will be accepted, Mr Hogger does not want any unsolicited material.

Kind regards

Carmel

Carmel Edwards
EIP Secretary
Minor Alterations to the London Plan EIP

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