

Osman, Louis

From: Valerie Selby <[REDACTED]>
Sent: 21 February 2022 08:16
To: PlanningPolicy Wandsworth
Cc: Biodiversity
Subject: Representation for the Reg 19 Local Plan - Policy LP27 Housing Standards
Importance: High

Dear Planning Policy team,

[Representation for the Reg.19 Local Plan - Policy LP27 – Housing Standards](#)

I wish to object to policy LP27 (criterion A2) of the Reg. 19 Wandsworth Local Plan.

This criterion (along with A1) defaults housing size standards to the Nationally Described Space Standard and to Policy D6 of the Published London Plan. In the case of internal space standards, this is an acceptable route, as the national standards secure basic space needs for the functional running of a dwelling and contributes to good design.

However, the national standards do not make any provision for external amenity space. Policy D6 of the London Plan does make provision for external amenity space (private outside space), but also clearly allows for local standards to exist.

During the last two years of the pandemic, it has become abundantly clear that access to external space, outside of one's home, is important to provide access to open air, for break out space, for exercise and recreation and for maintaining one's mental health and wellbeing. This has emphasised the role that parks and open spaces play, but those without some form of external amenity space associated with their own homes have arguably been worse off for the absence of a garden, private terrace or balcony. The plan should be seeking to ensure that, where possible and appropriate, new homes have good quality, private amenity space, and that housing providers are not able to default to a (sometimes inadequate) minimum expectation.

London Plan policy aims to set a bottom line for all of London but given London's huge diversity, cannot respond to local circumstances and context. Policy D6 clearly leaves an open door for local standards to be set, allowing authorities the freedom to realise external amenity space within new residential environments that suit the location, context, and future occupier. I understand that a number of authorities – including Lambeth, Southwark and Barnet – have done this in recent local plan documents, establishing a higher standard, particularly ensuring that family housing is able to support family activities within the residential curtilage.

For a long time, Wandsworth has also had a higher standard for external amenity space. Based on evidence and experience, Policy DMH7 of the adopted plan seeks 10sqm of space in non-family sized units and 15sqm in family sized units. These standards have been, and continue to be, applied to new residential development in the borough and often deliver space at these levels. Where they cannot be met, they allow a discussion to be had about how space might best be provided within development to meet future resident needs without having to default to the London Plan minimum (e.g., through communal spaces or larger habitable rooms). Notwithstanding the maintenance of the 15sqm standard in policies LP26 and LP7 of the Regulation 19 Plan, the absence of any standard for external amenity space in new housing development in the plan threatens to undermine the opportunity to ensure that residents have access to good quality, private space associated to their own homes, and gives the impression that a 'pan-London minimum' is an acceptable way forward for new housing across Wandsworth in all of its diversity.

The absence of a local standard for external amenity space is not justified given that a locally determined standard is viable, realistic and would not undermine other aspects of the plan (including housing delivery). The Plan should therefore reintroduce the standards for external amenity space as currently set out within the adopted Local Plan at Policy DMH7. This would also be consistent with the expectations set out for new family housing created on small sites or through conversions in Reg. 19 Policies LP7 and LP26. This provision could be made at criterion A2 of Policy LP27, or through the addition of a further criteria dealing specifically with external amenity space.



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