

The London Plan Examination in Public 2018-2019

Organisation: Levitt Bernstein

Date: 10 January 2019

Matter: 28

Housing Size Mix

M28. Would Policy H12 provide a justified and effective approach to achieving the dwelling size mix to meet London wide and local needs? In particular:

a) Does the dwelling size and mix identified in the 2017 SHMA provide a robust and realistic assessment of London wide needs?

We are extremely concerned by the dwelling mix set out in the 2017 SHMA; particularly the identified need for 55% of new homes to be one bedroom apartments/studios. We were not reassured by the presentations and discussion that took place during the technical seminar held in November, nor by the methodologies used to assess housing need.

We fully understand that young singles and couples find it very difficult to access suitable housing and are extremely sympathetic to their plight. We have long suspected that the true number of HMOs in London has been underestimated and it is positive that the latest SHMA recognises the compromises made by thousands of reluctant sharers.

However, the pressures on families and couples who want to start a family are just as acute. Historically, and for a variety of lifestyle-related reasons, a proportion of young families have always chosen to leave London and will continue to do so. The 2017 SHMA identifies that outward migration among 29-39 year olds is growing; what it fails to do is to interrogate the cause. We believe that an ever-increasing proportion of households in this demographic group is leaving from necessity, rather than from choice, and that this should be thoroughly investigated, and housing need re-assessed accordingly.

We are also concerned that the mix proposed in the SHMA will be detrimental to the strategic aim to create mixed and balanced neighbourhoods; places which are stabilised and characterised by households who feel rooted in a place and play active roles in their local community. It also seems clear that the very obvious pressure for numbers is also playing a part here and in a number of other proposed policies in the Draft Plan.

b) Would policy H12 provide an effective and justified strategic framework to deliver the mix of homes needed? What is the justification for preventing boroughs from setting prescriptive dwelling size mix requirements for market and intermediate homes and would this approach be effective? Would it provide sufficient flexibility to meet local needs? In light of this and the need to optimise density would it make a sufficient contribution towards family homes?

Policy H12 begins by making reference to the SHMA but also recognises the need to deliver a wide range of unit types, tenures and uses. In the consultation version of the draft London Plan, H12B specifically suggests that 'developments should not generally comprise mainly one person units'; we are very concerned that this has since been deleted at the request of MHCLG in the on-line version with minor suggested changes. Paragraph 4.12.5 has been similarly amended as required by MHDCLG. We would strongly recommend that the original text in these clauses should remain unaltered.

H12 also mentions the role of one and two bed homes in freeing up family housing. The majority of older people, even those who are single, are seeking two bedrooms and that should be reflected in the SHMA.

Notwithstanding the fact that some boroughs have historically set unreasonably high targets for family homes, we are concerned that the Mayor intends to prevent boroughs from setting mix requirements for market and intermediate homes. Developers need no encouragement to build small homes; for most that is

already the option of choice because they are the most profitable typology and the most likely to attract the first-time buyers who can benefit from Help to Buy. But they are also the least flexible; forcing people to move on (and out) or face overcrowding.

A further concern is that neither the SHMA nor the Draft Plan distinguishes between one person and two person dwellings, or between one bedroom flats and studios. We are therefore concerned not only by the number of one beds required but also that these could be mostly single person dwellings.

Single person studios are the most limiting and therefore the greatest concern. We know that many are already occupied by two people; some by families. Most studios are deep and narrow and the vast majority are single aspect with a single window – forcing dwellings to be designed contrary to Policy D4. Daylight, sunlight, ventilation and outlook are all compromised as a result and this impacts adversely on wellbeing. It also makes overheating significantly more likely. A separate bedroom affords greater privacy, more potential to separate different activities and a second window. While almost all one bedroom flats can be adapted to become open plan studios, very few studios can be adapted to provide a flat with a workable separate bedroom. We therefore strongly suggest that studios should only be permitted in specific, defined locations and should not exceed 10% of the dwellings in any given development.

c) Overall, would it meet the objective of Policy GG4 to deliver the homes Londoners need?

We are not convinced that it would meet the objective particularly if undue weight is given to the SHMA. Small apartments will always achieve the highest densities when expressed as dwellings per hectare but are the least dense in terms of bedspaces per hectare. Each person occupies 37m² in a single person studio; more than twice as much space as the 17.2m² attributed to each person in a fully occupied 3b5p apartment. They are also more expensive to build per square metre due to the fact that a greater proportion of the internal floor area is given over to kitchens and bathrooms - areas that need more services, drainage and fixtures and fittings than other parts of a dwelling. In addition, a larger number of circulation cores are usually required for residential buildings of predominantly studios or 1bed flat types, requiring more lifts and stairs than in buildings with a range of dwelling sizes and types, and therefore in this sense, predominantly one bed or studio accommodation is not the best use of land. A further disadvantage is also created by large numbers of one bed / studio accommodation, in that own door access from street level is not workable for one bed / studio flats, whilst achieving homes which stack structurally and in servicing terms (as the smaller types have very little frontage to achieve this). The resulting buildings create 'inactive' street frontages at ground level and also place a greater pressure on circulation cores, as all homes use core access as the main means of entry. This also can make these buildings less suitable for mixed tenure development, which is in direct contravention of policy 3.4.5B.

The real root of the problem is affordability. Families are unable to afford even a two or three bedroom flat, let alone the house and garden that most would prefer. Building fewer would only serve to make those that do exist, more expensive and drive out even more families.

We also note that this section makes no mention of cultural requirements or special needs arising from ethnicity. Some households have large families, some accommodate extended families (often including parents or grandparents who may have specific age-related needs) and others have cultural requirements which may require more space and/or a particular configuration of spaces.

In the consultation draft, paragraph 4.12.7 notes that HMOs 'are an important part of London's housing offer'. However, this section has been moved to Policy H11 in the suggested minor changes version. We are very concerned by the poor quality of many HMOs, which are only regulated through the Housing Health and Safety Rating System (HHSRH). We are equally concerned that while many London Boroughs have set their own standards for HMOs, including internal space standards, these are extremely low. Bedsits and studios are typically only required to be around 13m². The GLA needs to do more to raise these standards and achieve consistency between boroughs.