From:
 Steve Fidgett

 To:
 Carmel Edwards

 Subject:
 Matter 3.4 and 3.6

 Date:
 28 October 2020 17:53:47

Attachments: <u>image001.jpg</u> <u>image004.png</u>

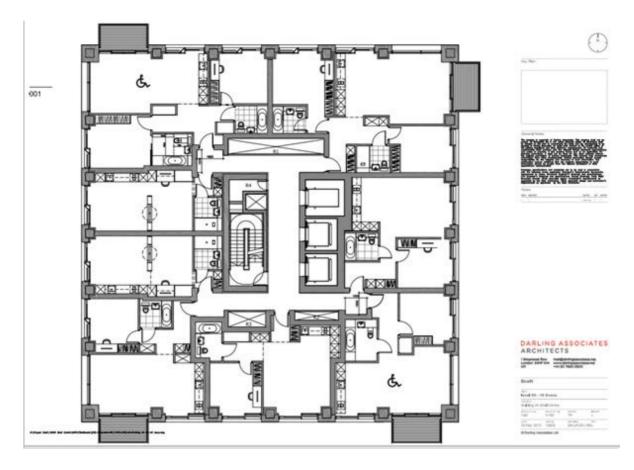
Carmel,

Following a review of the Council's evidence on the above, I am happy to provide a summary comment which I have set out as follows:

Matter 3.4 Housing Standards

The Council's evidence sets out a wide range of reasons why they consider single aspect units 'do not perform as well' as dual aspect units. We are concerned that the matters raised in reaching this conclusion are generalisations and are not borne out in our experience by detailed site assessment. We routinely carry out daylight/sunlight assessments, heating/cooling, privacy, outlook and air quality assessments on high density development in central London including Lambeth and have demonstrated numerous times that schemes have achieved the required standards on each measure while including a proportion of single aspect units. It is simply not possible with the majority of new flatted development to achieve 100% dual aspect units.

The consequence of the policy would be to prevent schemes that are otherwise acceptable. For a flatted development there are generally only 4 sides and with a central core, this limits the number of true dual aspect units that can be accommodated to 4 per floor. Flatted development generally requires more than 4 units per core to be viable and achieve efficient net to gross ratios. Hence it requires some units per floor that are single aspect. This is true of high quality schemes such as the Shell Centre and much of the development in Vauxhall and Waterloo. An example from the Shell Centre is below which illustrates the point.



There is even less choice in situations where you are dealing with infill plots which flank adjoining buildings and hence only have a front and back and where a central core is required.

It is also relevant that appropriate acoustic properties and daylight levels can be achieved in most situations by layout and façade design and specification. In poor air quality areas, this generally covers the wider area and hence façade orientation is less effective than internal ventilation and filtration schemes. These can combine with renewable technologies for low carbon development.

This is why the London Housing SPG (2016 as amended) provides guidance and not a strict policy preventing single aspect units. Standard 29 of that guidance applies throughout London and provides that developments should minimise the number of single aspect dwellings and in particular single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms. This is a recognised and reasonable approach and one that recognises that where these circumstances do not apply, single aspect units can form a part of a high quality development. This approach should be adopted here.

3.6 Student Housing

It is noted that in the Council's response on this topic, they propose the deletion of the requirement in 5.126 that there should be no more than two such uses in a given 500m radius. This deletion actually relates to the text supporting large-scale purpose-built shared living which classes such proposals as similar in nature to student accommodation in its potential effects. This deletion is supported.

However, our concern remains that large-scale purpose-built shared living is considered similar to student housing, which it is not. It serves an entirely different demographic group and its characteristics and facilities are much more closely aligned to largescale build to rent schemes. It is a formalisation of the 'room for rent' market that exists in the form of flat shares and house shares for local people and key workers and provides a high quality, managed product that provides better access to shared services and facilities such as libraries, cinema rooms, gym facilities, work space and resident lounges. There is no evidence that suggests any concentration of such uses with other uses, such as student accommodation has given rise to any specific concerns. I deal with this further in relation to Matter 3.11 and mention it now, simply as a marker as it has been raised under this topic.

Kind regards.

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Director



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