

From: [Steve Fidgett](#)
To: [Carmel Edwards](#)
Subject: Matter 3.4 and 3.6
Date: 28 October 2020 17:53:47
Attachments: [image001.jpg](#)
[image004.png](#)

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.

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.

Steven Fidgett

Director



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