

GL Hearn comments

Apeiron Capital Limited (vb@apeiron.com)

Page: [Policy H18 Large-scale purpose-built shared living](#)

Section: [N/A](#)

Object -

1. On behalf of our client Apeiron Capital Limited we write to submit representations to the Draft New London Plan 2017, and specifically Policy H18 – Large scale purpose built shared living.
2. We broadly support the principles of the policy and are pleased that the purpose built ‘shared living’ model of housing has been recognised in the Draft New London Plan (‘the Plan’).
3. The target market for this type of housing is likely to be early 20s – late 30s, though not exclusively. In terms of housing for this demographic, research undertaken by JLL confirms that location and cost, along with local amenities have higher priority above the size of accommodation. As such, the opportunity exists to deliver smaller but still high quality homes for Londoners, at a price that can be afforded.
4. As the Mayor will recognise, there are large (and growing) parts of society that do not qualify for social or intermediate housing and cannot afford to buy, or even rent a standard sized home alone in London. This means that increasing numbers of Londoners are being required to share accommodation in the private rented sector, where the challenges that renters face are well documented. The purpose built professionally-managed shared accommodation model offers one solution to this issue.
5. Not only are these developments properly managed, but where ‘private’ units (as defined at paragraph 4.18.6 of the Plan) are proposed as part of a larger shared living development, these allow people the opportunity to live alone if they want to; something that may not be an option with conventionally sized housing.

6. As a new housing typology there is currently a policy vacuum, with no clear or consistent guidance being provided to developers. Whilst it is right that the Plan comments on this form of housing, supporting it in principle, we question the need for such detailed policy at the strategic level. Policy H18 should therefore be revised to set the broad principles to guide development in this sector and an SPG providing the detailed guidance should be prepared separately.
7. If Policy H18 is to remain detailed, then much greater clarity is required, as set out below.
8. In Part A, the policy states “*where of good quality and design, may have a role...*” The reference to good quality and design needs clarity. For example, the size of a unit is not a prerequisite for ‘good design’. In other high density global cities such as Tokyo and New York, smaller apartments are the norm. It is therefore possible to deliver small units that incorporate innovative design and layouts, and that allow people to maintain high standards of living. We would welcome specific design guidance against which to assess development proposals, and this would ensure consistency across London.
9. The Draft Plan is required to be drafted in a positive way. For that reason, and given the need to speed up housing delivery and to offer a range of housing typologies to suit a range of budgets, it is clear that shared living *does have* a role to play in meeting London’s housing need. The policy should be amended accordingly.
10. We support Part A, Sections 1-4 and 5 a-e, but consider that Part A, Sections 5 f and g are too restrictive, lack clarity and are unenforceable. As such they should be deleted from the Plan.
11. It is not clear what is meant by “*community management*” and question the need for such a representative(s) within a shared living development. Whilst some operating models may want to invest in this, others may take a more organic approach to developing and managing the community for example, by the provision of high quality spaces that promote interaction and the natural growth of a sense of community. Providing a community manager is likely to add to the service charge of the building, putting up rents and potentially achieving very little. This aspect of policy is therefore considered unnecessary and counterproductive and should be deleted.
12. In respect of bedding and linen services, whilst we understand that for some residents this may be beneficial, in reality this would be an additional cost within the service charge and therefore increase monthly rents. Equally, residents should not/cannot be restricted on the type of bedding they use in their permanent residence.
13. Part 1, Section 6, lacks sufficient clarity to be a sound policy. The word “adequate” is subjective and should be deleted. Again, more detailed guidance on design standards should be provided as an SPG by the Mayor to set out the broad requirements for functional living space and layout.
14. In terms of what is classed as “demonstrably not C3”, this requires much clearer guidance in the policy and in a supporting SPG. To be Use Class C3 requires a unit to be “self-contained”. Within planning law, this is a concept that is open to interpretation.

15. There are varying models of shared living, with some developers providing a bedroom to an individual but with all other facilities shared; whereas others are seeking to provide the essential functions for domestic existence within a single unit. We would suggest both fall outside of Use Class C3 as some facilities such as dedicated living space and a fully fitted kitchen and bathroom are lacking, and in all cases there are various residential functions being shared with others. Paragraph 4.18.6 supports these typologies, terming the more fully fitted unit as “private”. We welcome this, but suggest that guidance is required by way of SPG to define what the Mayor would consider to be Sui Generis.
16. Without this guidance the policy would lack clarity, include contradictions, and therefore be unsound. Equally, debates over whether proposals are Sui Generis or C3 would slow delivery rates and ultimately harm the Mayor’s primary ambition of speeding up housing delivery in London.
17. Part A, Section refers to the requirement for a cash in lieu payment to offsite affordable housing provision. We are aware of the representations that the British Property Federation has submitted and fully support these, particularly in respect of affordable housing.
18. Whilst the principle behind this is understood, the level of contribution sought is likely to prove unviable in the majority of cases where large scale high density shared living accommodation is proposed. As such, we are concerned that at a time when it is important to speed up housing delivery and broaden the range of housing products available, the proposed policy will deter investment in this sector, which has so much potential to assist with tackling London’s housing need.