

BY EMAIL & POST

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Dear Mayor,

NEW DRAFT LONDON PLAN

REPRESENTATIONS ON BEHALF OF CATALYST HOUSING LIMITED

On behalf of Catalyst Housing Limited we hereby submit representations on the New Draft London Plan. We will also be writing to you separately in respect of representations prepared on behalf of other individual clients and as a Planning and Design Practice working within Greater London.

Catalyst Housing Limited welcome the draft London Plan's objectives to pursue 'Good Growth', 'build a city that works for all Londoners' and address London's 'housing crisis'¹. Addressing the latter requires a tightly honed Plan but it also requires bold decisions to be made on the type of residential accommodation that should be constructed to meet London's needs.

In this context, the purpose of these representations is to set out how Catalyst Housing Limited considers the draft London Plan can be made more effective and expedite delivery, particularly the delivery of new homes. Set out below are recommendations in respect of the promotion and delivery of 'shared living' accommodation and how these specific points can be addressed in the draft London Plan.

Chapter 4: Housing			
Policy H3	Counting delivery from student housing or shared living schemes	The current draft London Plan policy states <i>'Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of</i>	Such development is currently counted on a 1:1 basis (i.e. each student room is equivalent to a Class C3 1 bed - 1 person (1b1p) studio home).

¹ This can be defined by current annual rates of housing delivery addressing less than half of identified need. Recent years have seen average net delivery of 31,125 homes. The draft London Plan identifies need for roughly 66,000 homes per annum. Different approaches outlined by the government and HBF suggest the level of need is higher still.



		<i>a 3:1 ratio, with three bedrooms being counted as a single home.'</i>	<p>There is a logic to the current approach in that in practice each person occupying their own space is in essence a household. If they wanted to live together with a partner, family members or others then they could.</p> <p>The perverse outcome of the approach outlined in the draft London Plan is that monitoring reports would effectively be undercounting delivery for alternative forms of accommodation. This is especially peculiar given 1b1p studios will still be counted on a 1:1 basis when the number of people actually being housed is identical.</p> <p>The current approach should be maintained and such accommodation counted on a 1:1 basis.</p>
Policy H12	Reducing housing pressure and freeing up family housing	The recognition that new development and the delivery in particular of one and two bed homes assists with this is welcomed.	The Plan should cross-refer to these principles in Policy H13 Build to Rent and Policy H18 Large-scale purpose-built shared living. These are fundamental aspects of the wider public benefits that such developments will provide.
Paragraph 4.12.5	Smaller unit sizes	It is encouraging to see that the Mayor recognises that one-bedroom units play a very important role in meeting housing need. However, this paragraph appears to omit any recognition of the demand for "smaller" or "shared Living" units which are smaller than the minimum space standards contained with Table 3.1. These units are attractive to professionals and key workers that want to be independent but cannot afford to rent a larger one-bed flat (37 to 50 sqm). Whilst these self-contained units are smaller than the normal rental market unit, they also tend to benefit from a reduced rental level (because of the size of the units) and benefit from shared facilities such as workspace, gym, community space and amenity space.	We respectfully request that this type of product (and the demand for it) is acknowledged in this section of the New Draft London Plan.
Policy H18	Large-scale purpose-built shared living	This policy is supported by CHL on the basis that it supports purpose building shared living accommodation.	We are, however, concerned that providing the equivalent of 35% of these lower-rental units as an off-site financial contribution in-lieu of an on-site affordable housing provision will make these schemes unviable. The policies reference to the submission of a viability assessment must remain in this policy.

We trust that these representations will help the Mayor refine the next draft of the New London Plan.

If there is anything that Officers would like to discuss, please do not hesitate to contact us at these offices.

Yours sincerely

**BARTON WILLMORE LLP
ON BEHALF OF CATALYST HOUSING LIMITED**