

M28 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?

No. We share the Highbury Group's view that the SHMA has made unwarranted assumptions that concealed households are childless and would remain so after moving to set up on their own. We also believe that there are also unwarranted assumptions made about under-occupation rates significantly reducing in the future across both private and social rented households. These assumptions are unrealistic and mean that the 2017 SHMA is not robust, and should not be relied upon.

Just Space proposes to re-word: H12 (A6 the nature and location of the site). A mix of dwelling sizes, including family homes, at all rent levels is needed in all parts of London. Within each borough some locations will be more suitable for one and two bed units than others.

Highbury Group proposes: "At least 30% of a new development should be units with at least 3 bedrooms, unless the local planning authority determines that a specific site is unsuitable for residential accommodation for households with children." As being in line with the evidence in the SHMA. We consider that this blanket 30% figure is still too low to meet the needs estimated in the SHMA's central projection (Table 1). Table 15 of the 2017 SHMA is based on more realistic assumptions than the principal scenario, and it finds a requirement that 62% of new homes in the market sector need to be family sized. Just Space thus urges the application of prescriptive dwelling size mix across all tenures to ensure that this need for family sized accommodation is met.

- . 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?

The text argument in support of this policy makes much of the fact that there is no way to ensure that family-size homes in the open market are occupied by families. While that is clearly true, we must stress (i) that sharing groups of adults are a perfectly legitimate kind of household, (ii) that if family-sized units are available in the open-market stock then they are likely to be used by families **for part of the building's lifetime at least** and (iii) controls over size mix can be very important in the places where profitability considerations would otherwise encourage developers to focus only on small units. Boroughs which have sustained such policies have many contented leaseholder families who would otherwise have been unable to meet their needs in those localities.

The SHMA estimates reproduced in Table 43. show that family sized (3 bed and larger) homes are a **much** larger proportion of total need in the market sector than in the other 2 sectors.

Just Space thus urges the application of prescriptive dwelling size mix across all tenures. Boroughs would then be required – and free- to build an argument based on local needs if they wished to apply detailed local evidence of need not in conformity with the London Plan provisions.

Boroughs should have power to require MORE low cost rent than levels indicated by the London wide SHMA if their local needs studies indicate it, but not the freedom to do less. The desperate need for more low cost rent (to make good the backlog of unmet need and to meet current needs) is a London-wide strategic imperative to which all localities must respond.

Just Space is also deeply concerned that the Mayor has failed to consider the differential impact of this policy on groups with protected characteristics and is thus in breach of his Public Sector Equality Duty. He should have investigated the impacts on all equality groups, seeking out information through research and/or consultations. He does not appear to have done this either in the original IIA or in the later revision. On this particular topic the glaring failure relates to the widely differing household sizes common in various ethnic groups. In earlier periods Irish families were typically large; now we know that (for example) some orthodox segments of the Jewish community, Somalis and Bangladeshis typically have large families. The Mayor has no excuse for failing even to consider these differences. Preventing the imposition of dwelling size mix policies in market and intermediate housing would thus tend to affect these communities adversely – and impede those boroughs who seek to discharge their PSED properly. This is a compelling legal argument for the deletion of this policy sub-section C.

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

No, for the multiple reasons given above.