

# Large-scale Purpose-built Shared Living London Plan Guidance

Consultation summary report

February 2024

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### Introduction

Between 27 January and 27 March 2022, the Greater London Authority (GLA) carried out a formal consultation on the Mayor’s draft Large-scale purpose-built shared living London Plan Guidance (LPG).

Three online events were held through the consultation period for Londoners to learn more about the draft LPG and ask questions. This report provides a summary of the consultation responses received during the consultation period via an online survey and from submitted emails and stakeholder event comments and questions. It identifies the key issues that were raised on the draft LPG, noting the type of stakeholder raising the issue where this was distinctive. It then sets out the GLA’s response to these issues, highlighting where follow-up conversations with particular stakeholder groups, including groups of developers, research bodies and Local Planning Authorities, as well as GLA development management colleagues, have informed this.

The Mayor would like to thank everyone who took part for engaging with the guidance. Appendix 1 includes a breakdown of all the consultation and engagement activity held since the draft LPG was published.

### Who took part?

Through the consultation period there were 215 attendees to virtual events, 3,611 page views and 797 document downloads. Of the 33 consultation responses received, 16 were sent through the dedicated online consultation survey, 2 sent both through the survey and via email, and 15 sent directly via email. This report provides a summary of the key issues raised in these responses and wider discussions both during the consultation period and subsequently.

The information on respondent type is taken from the information submitted with the formal consultation responses. There is limited data available about event attendees and those who responded via email. There is no detailed data available about virtual event attendees and page views. Therefore, the information on who took part likely represents only a small sample of those engaged and does not reflect the true breadth of engagement.

Survey respondents were asked whether they were responding as an individual; and, if not, what type of organisation they represented. The responder’s self-identified typologies are broken down in the table below.

Respondent type	Number	Percentage
Anonymous	5	15%
Business	14	42%
Government body or agency	1	3%
London Local Planning Authority	12	36%
Professional Body	1	3%
<b>Total</b>	<b>33</b>	<b>100%</b>

Survey respondents were asked for equality monitoring information to assess how representative respondents were compared to the demographics of Londoners. However, as the number of responses received on those questions was limited, an accurate analysis could not be made and has not been included in this consultation summary report.

## Consultation feedback and GLA response

### 3.1 Summary of Large-scale Purpose-built Shared Living LPG consultation responses.

As part of the consultation on the draft guidance, respondents were asked to submit answers to a survey with specific questions through the GLA’s online consultation portal. This section goes through each of the online survey questions and summarises the key matters raised in response. It also incorporates the responses received through emails submitted during the consultation period that relate to the theme of that question.

**Question 1. PLAN MAKING:** Section 2 sets out that boroughs can implement local policies and site allocations that may allow or limit LSPBSL developments based on specific contexts (to address range of housing, including affordable housing and to create mixed and inclusive neighbourhoods). Are there other aspects of planning for LSPBSL developments through local plans that should be considered in this section?

The key matters raised:

- There was general support from LPAs for the opportunity to create a local policy framework regarding LSPBSL development.
- Greater clarity was requested from LPAs to define what LSPBSL is and how it differs from other housing options.

- Concern (from developers and LPAs) to explain the role of LSPBSL in meeting housing need and where it sits in the hierarchy of required housing provision by typology.
- Additional guidance is required on how LPAs could define mixed and inclusive communities and how to identify and manage where an overconcentration of LSBPSL development is occurring within an area.
- Greater clarity is required for LPAs on how to secure affordable housing contributions.
- Many LPAs consider that LSPBSL developments should be restricted to locations with a PTAL of 5 and above.
- Some LPA respondents flagged a concern with overly relying on PTALs failing to allow site specific connectedness to active transport and proximity to local amenities to be considered.
- Clarity is required to know if an LSBPSL development qualifies for the Fast Track Route if sufficient C3 affordable housing is being provided on site.

### GLA response

Sections 1.2 and 2 of the revised draft LPG proposed for publication provides clarification regarding the definition of LSPBSL development and its function as well as guidance on potential options for plan-led approaches to creating mixed and inclusive neighbourhoods and for assessing and managing potential overconcentration of LSPBSL development within an area.

Guidance on the locational and access considerations for LSPBSL development has been updated and nuanced in section 2.1 of the revised LPG; Local Planning Authorities can refine this through Local Plans.

The draft Affordable Housing LPG that was consulted on in May-July 2023 contains details regarding affordable housing provision in LSBPSL development [Affordable Housing LPG - Draft for consultation May 2023](#) and this is cross-referenced in paragraph 4.1.5 of the revised LSPBSL guidance.

**Question 2. PRIVATE ROOMS SIZE (STANDARD):** Do you agree that the size of private rooms should be between 18sqm to 27sqm? If not, could you please suggest an alternative range and explain why this would be more appropriate.

In general, LPAs supported the need for clear minimum and maximum private room size area requirements with many recommending the minimum room size area be increased.

Other respondents provided a wide variety of recommendations with supporting information for alternative minimum and maximum sizes, or for removing size limits all together.

The key matters raised:

- Concern that if rooms in LSPBSL development are too small they will create unacceptable living accommodation, but that larger rooms could eventually be converted into or operate as substandard C3 self-contained housing.
- Where larger private rooms sizes are provided smaller communal areas should be permitted and where the private rooms are at provided at the smaller end of the proposed scale, there should be the requirement for additional communal amenity space.

### **GLA response**

Ensuring that private rooms provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes is a key aspect of Policy H16 of the London Plan.

Fundamental to the LSPBSL development concept is the emphasis on communal living with large-scale and cooking, dining, laundry and recreational facilities shared between the residents in the building. It is critical to ensure that units within LSPBSL will remain non-self-contained and private rooms aren't built to a size, or equipped with facilities that will encourage self-containment by design to avoid the potential future creation of substandard living accommodation in developments of this nature.

Since the draft LPG went out for consultation there have been a number of LSPBSL developments completed and operating with private bedroom sizes of 18sq.m that demonstrate that, when well-designed, they are large enough to provide good quality accommodation.

Rooms sized 26 sqm or more in some LSPBSL developments are being advertised for 2 person occupancy by their operators, demonstrating that increasing the upper limit of the private room size standard would lead to a greater number of rooms being occupied by couples. The LPG proposed for publication? relaxes the need for all units to be single occupancy (see question 10 of this report) but that generally LSPBSL should be for single person households who cannot or choose not to live in self-contained homes or HMOs. This is outlined in section 1.2.3 of the revised LPG.

A significant amount of information, analysis and case studies were submitted by respondents to support a variety of positions regarding how the LPG should address private room area size ranges, much of which was contradictory.

A review of data gathered including the analysis of approved and operating LSPBSL developments that have been completed since the release of the draft LPG suggests that the recommended private room sizes of 18sqm to 27sqm is appropriate in line with the policy objectives, so it is retained in the LPG proposed for consultation.

Should there be a desire to convert LSPBSL developments to C3 accommodation in future this would require planning permission and there is a robust housing quality policy framework to shape what would be acceptable.

**Question 3. PRIVATE ACCESSIBLE ROOMS SIZE:** Do you agree that the size of accessible private rooms should be between 28sqm to 37sqm? If not, could you please suggest an alternative range and explain why this would be more appropriate.

Just over half of those that responded to this question agreed with the proposed area range identified in the draft LPG.

Other respondents advocated for either larger or smaller minimum area requirements and provided evidence and examples to support their positions.

The key matters raised:

- Many LPAs advocate for the LPG to reference building code standards from ADM Volume 1 and 2 (M4(2) and M4(3)), including guidance produced by Access Association Inclusive Hotels group for the accessible rooms layouts and design, with specific focus on bathrooms and kitchenette.
- Other respondents advocate for the removal of any area standards for accessible unit but that the LPG include the need to demonstrate they have been designed with adequate facilities and turning radii.
- That flexibility around the 10 percent accessible unit number should be provided to allow for a combination of accessible and adaptable rooms (e.g. on a 3:7 ratio).

### **GLA response**

To provide suitable housing and genuine choice for London's diverse population, including disabled people, the GLA is consistently applying the policy of at least 10 per cent of new dwellings in housing development, or bedrooms in serviced and student shared accommodation that are required to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' standards.

The post-consultation revised LPG has retained the guidance regarding 10% of the bedroom units to be accessible. Paragraph 3.11.5 of the revised LPG has introduced the potential for accessible rooms that are smaller than 28sqm to be considered where it has been demonstrated that part M of the building regulations be met and where the design has been approved by an inclusive accessibility expert. Adaptability may be more appropriate in relation to other aspects of the building once key parameters such as lift access and wheelchair turning space in corridors are achieved and this is highlighted at paragraph 3.3.7 of the revised guidance.

**Question 4. INTERNAL COMMUNAL SPACES:** Is 5 sqm per resident of internal communal space adequate? If not, could you please suggest an alternative amount and explain why this would be more appropriate.

In general, the responses from LPAs either supported the 5sqm of internal communal space per resident or advocated for it to be increased. Other respondents



objected to this amount of space as an overprovision that creates adverse outcomes and provided several alternative recommendations. Some also commented on the distribution of these spaces.

The key matters raised:

- The requirement is too prescriptive and prevents proposed development from responding effectively to site specific constraints and intended demography of occupants, leading to poor design and other (e.g. viability) outcomes.
- That the flat rate of 5sqm is too large for developments of any size/bedroom size and particularly fails to consider the economies of scale in the larger developments. In built out LSPBSL development this has led to the creation of underutilised space that provides little value to residents.
- That there should also be flexibility over distribution, and fixed approach requiring provision on every floor was not always appropriate – a balance between dispersal and centralisation of such spaces is needed to account for different preferences and willingness to ‘travel’ within the building and different potential outcomes (e.g. domination by those in proximate rooms compared to underuse from being too remote).

### **GLA response**

Section 3.3 and table 3.1 of the revised LPG identify recommended benchmarks for the provision of sqm per person of communal space within a proposed LSPBSL development. These benchmarks have been refined in light of the best practice examples of LSPBSL development observed from site visits, reviewing operational data gathered from occupant surveys and from assessments of potential LSPBSL development proposals by GLA development management officers. The flat 5 sq m requirement has been replaced with a benchmark that varies with accommodation block size.

In addition, the guidance has been amended to allow some flexibility in the recommended provision of this space where it is demonstrated that qualitatively good outcomes are achieved that satisfactorily meet the needs of residents (see paragraph 3.3.3 of the revised LPG).

Locational/distributional guidance relating to communal living/social space has been made more flexible, whilst still emphasising the importance of ease of access (see revised LPG paragraph 3.7.2).

**Question 5. EXTERNAL COMMUNAL SPACE: Is 1sqm per resident of external space adequate? If not, could you please suggest an alternative amount and explain why this would be more appropriate.**

The majority of responders to this question disagreed that this amount of space provision was appropriate. Most LPAs recommended an increased minimum sqm area per person with other responders advocating for flexibility in the LPG on this requirement.

The key matters raised:

- Many LPAs advocated for the minimum to be increased to 2sqm per resident.
- That proximity of a development to public open space, local parks and water courses should be a material consideration in allowing a reduction of onsite external communal amenity area provision.
- The flat rate requirement fails to consider the economies of scale for larger LSPBSL schemes and prevent LSPBSL development coming forward where there are site-specific restrictions within denser urban areas.

### GLA response

Section 3.3.4 and 3.10 of the revised LPG states that opportunities for the provision of external communal space should be maximised and design led. Table 3.4 identifies the recommended benchmarks for external communal space based upon a review of best practice examples of LSPBSL development observed from site visits, reviewing operational data gathered from occupant surveys and from assessments of potential LSPBSL development proposals by GLA development management officers. This now varies with accommodation block size.

The guidance has also been amended to allow some flexibility in the recommended provision of this space where it is demonstrated that qualitatively good outcomes are achieved that satisfactorily meet the needs of residents.

**Question 6. EXTERNAL COMMUNAL SPACE:** The LPG stipulates that none of the outdoor spaces provided as part of LSPBSL should be smaller than 40 sqm. Do you agree that this is an appropriate minimum? If not, please suggest alternative approaches.

Less than half of respondents agreed that this was appropriate and most (whether they agreed or disagreed) advocated that the priority for external space provision was to ensure the accessibility, good design quality and adaptability for a variety of functional uses.

**Question 7. EXTERNAL COMMUNAL SPACE:** To what extent do you agree or disagree with the following sentence: As described in the guidance, external communal space should be provided as one or two aggregated spaces rather than small outdoor spaces on different floors.

Just over half of the responders agreed with this sentence in the guidance with the remainder being unsure or disagreeing.

**Questions 5, 6 and 7** were drawn from a single section - 4.9.2 of the draft LPG that states *At least one sqm of external communal space should be provided per resident. This space should be provided as one outdoor space at ground floor or podium level. If an aggregated space is not possible, external communal space should be provided as ground floor or terrace gardens, with each individual outdoor space at least 40 sqm.*

As such many of the responders to questions 6 and 7 merged their answers.

The key matters raised from questions 6 and 7:

- Aggregated spaces were supported but the restriction of a 40sqm minimum size was considered arbitrary and impractical.
- Specifying locations for such spaces were too prescriptive and didn't allow for roof gardens or the creation of smaller more intimate spaces.
- Flexibility should be allowed to respond to site specific constraints and proximity of the development site to publicly accessible green spaces.

### **GLA response (to points raised in questions 5, 6, and 7)**

The requirements outlined in question 5, 6 and 7 have been taken out of the revised LPG. Sections 3.3.4 and 3.10 put the emphasis on design-led responses to context and high quality flexible, multipurpose aggregated space that is designed to encourage recreational use and group interaction.

**Q8. KITCHENS:** To what extent do you agree or disagree that communal kitchens should be provided on every floor and any alternate arrangements need to demonstrate convenient access for residents. Please tell us if you have any comments on kitchen amenities and location in this guidance.

LPA respondents generally supported the principle of communal kitchens being provided on every floor or one on every three floors as a minimum. The other respondents were firmly opposed to this requirement.

The key matters raised:

- Clarity is required on how 'convenient access' to these kitchens should be measured.
- This requirement is excessive, fails to consider site specific restrictions and are impractical to manage and so likely to create "silos" within an LSPBSL and / or unused facilities.
- Fewer and larger kitchens, if located in the right places within a development, would be more likely to create the opportunity for community building for residents.

Responses to this question also incorporated commentary on the requirements outlined in the draft LPG regarding kitchen areas and equipment. Some LPAs advocate for more kitchen area space and equipment and other respondents object to what they considered an over-provision of space and impractical and overly prescriptive equipment provision requirements.

### **GLA response**

The consultation and engagement evidence gathered by the GLA suggests the draft guidance failed to account for the variation in the types of equipment that can be provided in kitchens and laundry facilities and flexibilities in design. Instead, the revised guidance suggests that the management plan should demonstrate that what is being proposed will adequately meet residents' needs.

The requirement for kitchen space / cook station provision has been amended to a recommended benchmark, and equipment specifications clarified as indicative, with the guidance focusing on the desired outcomes of creating shared spaces that will genuinely create the opportunities for community building with the development. See section 3.4 and tables 3.1 and 3.3 of the revised LPG

### **Q9. MANAGEMENT:** Do you agree with the requirements for management plans set out in Section 5 of the guidance.

Nearly all respondents agreed with the sentence. Seven, mostly boroughs, gave further comments.

The key matters raised:

- That management plans need to have sufficient details regarding maintenance and operations, particularly in relation to safety, security, waste
- That it may be helpful to consider appropriate marketing and awareness of wheelchair-accessible units
- That requirements should not be too restrictive or prescriptive and needed to be sufficiently flexible e.g. regarding tenancy length and what should be included in rents.

### **GLA response**

The section of the guidance has been reviewed for clarity and alignment with amendments made to other sections. This has resulted in some minor changes regarding the role of the management plan in demonstrating sufficiency of facilities, and some additional detail to aid understanding. However, the level of detail regarding the management issues raised is generally considered to be appropriate.

A review of the level of prescriptiveness has also been undertaken in line with an overall emphasis on design flexibility to enable response to different needs and site/scheme context. Some minor amendments have been made (e.g. in relation to

fixed provision for prayer rooms). It is not considered appropriate to relax the guidance regarding tenancy length or charging for facilities given that these are fundamental to the London Plan's position regarding the role/definition of this product (see section 1.2 of the revised guidance) and definition of facility sufficiency.

It is considered appropriate in light of the policy's reference to mixed and inclusive neighbourhoods and wider equality objectives to add a reference to marketing to ensure awareness e.g. of wheelchair accessible rooms and the ability of the accommodation to flex to address different needs.

### **Q10. GENERAL:** Do you have any further comments to make on the guidance?

Key matters raised:

- The single-person occupancy recommendation is too restrictive, difficult to enforce, and out of step with the realities of the needs that this type of housing is meeting.
- The style of language being used in this section and throughout the draft LPG reads like directives of an adopted statutory policy as opposed to guidance that is a material consideration for planning matters related to LSPBSL.

### **GLA response**

Section 1.2.3 of the revised LPG has been amended to reflect the nature of guidance and reflect the fact that single occupancy won't always be possible due to enforcement, viability and equalities (relating to marital status) considerations, indeed Larger rooms in operating LSPBSLs are already being let to couples. By having flexibility to the single occupancy need LPAs will be able to assess the viability of a scheme on the basis that the larger rooms are likely to be double occupancy and secure increased contributions to affordable housing. This is also reflected in the section (5.2) with regards to the information to be provided with planning applications.

Having a maximum number of residents allowed to occupy a scheme is recommended as part of the management plan and suggested for inclusion in the section 106 to provide certainty regarding the overall number of residents and help to prevent small to medium sized rooms being let for dual occupancies. This is reflected in section 5.1 of the revised LPG on management plans.

The style of language within the revised LPG has been amended to reflect its role as a guidance document to policy and its use as a material consideration in support of Policy H16 of the 2021 London Plan.

### **Other themes raised during engagement**

Discussions at consultation events generally highlighted issues that went onto be raised in the consultation responses. Testing of proposed revisions with stakeholders

notably Local Planning Authorities has helped refine the revised guidance and ensure it sufficiently explains what is expected in terms of the policy H16, and informed by current best practice. Areas that have been refined includes:

- the applicability to schemes of less than 50 units,
- expectations regarding parking for blue badge holders and cycle parking,
- viability testing in light of some units being suitable for double occupancy,
- concern not to relatively advantage or disadvantage similar products, (notably purpose-built student accommodation) and to continue to prioritise C3 (particularly affordable) accommodation, and
- management of resident access to open to all facilities.

There was also interest in improving access to information about schemes in different parts of London to better understand evolving market trends in areas such as design.

### **GLA response**

These matters have been addressed as part of an iterative review process that is mindful of other guidance, including that under preparation. Clarifications and additional considerations, including some additional flexibilities have been added in line with the overall intention of the guidance helping to smooth the planning process and optimise delivery of policy objectives. These include the flexibility to consider reduced bike parking if pool bikes are available free of charge, and additional guidance on how to address spatial and delivery imbalances that run counter to mixed and inclusive neighbourhood objectives. This, and a new specific section on affordable housing provision aligns with draft guidance on purpose-built student accommodation.

### **Equality impacts**

Equality impacts were raised in relation to:

- the single occupancy stipulation which was suggested to be potentially discriminatory to couples and the protected characteristic of marriage
- inclusive design detail - concern that this didn't go far enough, including in management/operational detail for development to be truly inclusive to disabled people or others with particular needs relating to their protected characteristics. A particular concern was that co-living developments are oriented through design and marketing to appeal to a particular demographic – young and non-disabled – which could deter other potential residents who might benefit from the offer.

The evidence for the positive assessment of the ability of LSPBSL developments to contribute to affordable family-sized housing through the guidance on mixed and balanced neighbourhood considerations was also queried.

### GLA response

- The removal of the single occupancy recommendation is discussed under Q10 above.
- The guidance relating to inclusive design and management has been strengthened overall as detailed in various sections above whilst acknowledging that some flexibility is needed where operators have demonstrated that this is not detrimental (e.g. bookable space that can be used for prayer rather than requiring dedicated prayer rooms). Language has also been updated to reflect the latest good practice guidance.
- It is acknowledged that there is some uncertainty over impact of guidance that has yet to be tested. However, feedback from LPAs and others involved with the development management process suggests the clarifications (including the additional detail added post-consultation) should improve the ability to pursue appropriate neighbourhood housing mix and address any emerging imbalances. This should be kept under review through ongoing monitoring processes detailed below.

The EqIA has been updated to reflect post-consultation amendments and these matters.

### Next steps and monitoring

Consideration was given to whether a further re-consultation on a revised draft would add value to the guidance, however given that there has been ongoing engagement with the key interested parties following on from the formal consultation period it was felt that this would not add value having regard to the use of resources and stakeholder time. This follow-up engagement has included operators, LPAs and the GLA's own planning and viability officers, and as explained above, has enabled the iterative refinement of the document to best support policy objectives and appropriately address concerns.

Monitoring of the policy continues in line with the wider London Plan monitoring framework, and review of planning applications and decisions related to this type of housing. Ongoing engagement with stakeholders, including through the present Planning for London programme and regular meetings with LPAs is another important aspect of monitoring. Together these can inform review of the policy and supporting guidance over time. This will be particularly important to help monitor equalities impacts and ensure that mixed and inclusive neighbourhoods objectives are being met.



## Appendix 1

### Consultation Respondents

London Boroughs:

Newham, Croydon, Southwark, Redbridge, Tower Hamlets, Bromley, Lambeth, Islington, Richmond upon Thames, Wandsworth, Brent, Greenwich

Local government (other):

ReLondon (partnership)

Industry/Professional:

RGP, UK Housing Partnership, Caddick, Common Living, Poha House, Manner, Halycon, Fifth State and Whittington, Reshape and Crosstree, SAV, Yoo, Tide/HTA, 2<sup>nd</sup> Generation Shared Living Consortium, BPF (compact living working group), SLP UK

Anonymous:

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### Consultation Event Attendees

Event Date	Focus	Attendees
25th Feb 2022	Local Planning Authorities	61
22nd Feb 2022	Industry	152
18th March 2022	Open to all	109



## Post-consultation engagement

Event details	Group	Key findings
Teams meetings - 24/02/23, 19/05/23, 27/09/23	Halcyon	Key learnings from the three LSPBSL developments they have completed. Implications of draft LPG/potential changes to LPG. Updated evidence for consideration.
Site visits - 02/03/23 Sunday Mills, 08/08/23 Florence Dock	Halcyon	Review of built schemes for evidence of quality and good practice linked to different quantum of e.g. private room size and communal amenity space
Site visit - 08/03/23 Croydon	Tide	Insights into the outcomes of a tower development with larger rooms.
Teams Meeting - 01/03/23	DP9	Updated evidence for consideration relating to recent schemes. Implications of draft LPG/potential changes to LPG.
Teams Meetings - 19/01/23, 19/07/23	The Consortium	Updated evidence for consideration. Implications of potential changes to LPG.
Borough Director event (part of the Planning for London Programme) - 04/09/23	LPA Planning Chiefs	The key concerns regarding LSPBSL development from an LPA perspective
Teams Meetings - 16/08/23, 06/10/23	Newham Council	Specific issues that Newham is facing with LSPBSL development applications. Implications of draft LPG/potential changes to LPG.
Teams Meeting - 07/09/23	Waltham Forest	Specific issues that Waltham Forest is facing with LSPBSL development applications. Implications of draft LPG/potential changes to LPG.
Teams Meeting workshop – Discussion with LPAs on key changes - 08/10/23	Brent, Bromley, Croydon, Newham, OPDC, Redbridge, Waltham Forest	The key concerns regarding LSPBSL development from an LPA perspective. Testing of draft revisions and implications of these, additional clarifications and nuances discussed

