

M33. Would Policy H18 provide a justified and effective approach to the delivery of large scale purpose built shared living accommodation in London?

- 33.1 Yes. Large-scale purpose-built shared living (LSPBSL) is a relatively new approach to housing provision in London and there is currently no national policy or guidance to manage the delivery of this type of housing. This notwithstanding, there is developer interest in delivering LSPBSL in London and, therefore, Policy H18 is required, firstly to help define what the product is and secondly to effectively manage the delivery of new LSPBSL development proposals to ensure that they support the delivery of Good Growth.

In particular:

a) Would the criteria set out in Policy H18A be justified?

- 33.2 Yes. All the criteria set out in Policy H18 A are justified in that they will help to ensure that LSPBSL developments are managed effectively to provide high-quality accommodation in a way that delivers the Mayor's Good Growth objectives. The importance of each criterion is set out below:

H18 A 1) it is of good quality and design

- 33.3 LSPBSL will usually be of a sizeable scale – new proposals will typically provide at least 50 bedrooms. Development of this scale can be expected to be of local townscape significance and must therefore achieve good design quality. Furthermore, the residential density of LSPBSL development is relatively high. It is therefore essential that good quality design is required to protect the amenity of tenants and neighbours. A key feature of the product is that the residential offer includes a small private room with access to functional communal spaces and facilities. It is essential that the quality of these spaces is of a high standard to ensure that residents have access to sufficient, functional and comfortable private and communal space that can help to safeguard their mental and physical health. The GLA may publish supplementary design guidance for LSPBSL if this is considered necessary to ensure that new LSPBSL development is of good quality and design.

H18 A 1A) it contributes towards mixed and inclusive neighbourhoods

- 33.4 LSPBSL developments are likely to be occupied by a relatively homogeneous group of tenants, because the product provides mostly single-person units that are likely to appeal to adults who do not cohabit or have dependent children, and because LSPBSL developments are mono-tenure and so are likely to be occupied by working adults. For these reasons it is important that how a LSPBSL contributes towards mixed and inclusive neighbourhoods is an explicit consideration. This is also consistent with the requirement of Policy GG1 B and the 2012 NPPF.¹

H18 A 2) - it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency

- 33.5 LSPBSL is a relatively dense form of development in terms of number of individual households per hectare. Furthermore, the profile of tenants is skewed towards working

¹ NLP/GD/03: DCLG, National Planning Policy Framework (NPPF) 2012, Paragraph 50

adults that are likely to generate demands of local public transport infrastructure at similar times of day. It would be unsustainable to deliver LSPBSL in locations that are not well connected by public transport as this could put unacceptable stress on existing public transport provision and it may increase private motor vehicles uses, which would be detrimental to Londoners' health and counter to the Good Growth objectives of the draft Plan, and the requirements of Policy T1 in particular.

H18 A 3) - it is under single management

- 33.6 LSPBSL developments do not provide self-contained accommodation and all tenants rely on well-managed communal facilities and services. In order to ensure consistent, transparent, high-quality and cost-effective services and management, it is important that LSPBSL developments are retained under single management.

H18 A 4) - its units are all for rent with minimum tenancy lengths of no less than three months

- 33.7 Tenancies must be for no less than three months to ensure that the product is providing housing, rather than being used as serviced holiday apartments or as a form of temporary hostel accommodation. Both these alternative uses give rise to a different set of planning considerations. Unlike Built to Rent development, which provides a longer-term housing option for renters, LSPBSL is typically used by tenants as an in-between housing choice before finding a more permanent form of accommodation. For this reason, it would not be appropriate to require longer minimum tenancy lengths that might prevent tenants from moving on to longer-term housing.

H18 A 5) - communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:

- 33.8 Private bedrooms should not function as under-sized and sub-standard self-contained accommodation. Communal facilities and services are an integral part of the LSPBSL offer and provide for social interaction between the tenants. These facilities and services must be sufficient to meet the needs of the intended number of tenants.

H18 A 5 (a) Convenient access to a communal kitchen

- 33.9 It is essential that LSPBSL tenants have access to communal kitchen facilities that enable them to prepare meals. Communal kitchen provision should be sufficient that no tenant must travel an unreasonable distance to prepare their meal and no tenant should be unable to prepare their meal at times of relatively high demand.

H18 A 5 (b) Outside communal amenity space (roof terrace and/or garden)

- 33.10 Most private rooms will not provide private outside amenity space. It is therefore important for tenant's health and wellbeing to have access to outside communal amenity space.

H18 A 5 (c) Internal communal amenity space (dining rooms, lounges)

- 33.11 Private rooms do not provide adequate or functional private amenity space to be used as self-contained units. It is therefore important that LSPBSL developments provide sufficient internal communal amenity space to meet the full range of non-bedroom room functions that would usually be provided for in a self-contained unit. This

includes dining rooms, kitchens and lounges, but may include additional uses that facilitate social interaction and provide a good residential quality to LSPBSL tenants.

H18 A 5 (d) Laundry and drying facilities

- 33.12 Private rooms do not provide laundry facilities and laundry is a basic human necessity. It would be unreasonable to expect tenants to rely on private laundrettes for laundry as these may not be accessible.

H18 A 5 (e) A concierge

- 33.13 The provision of concierge services ensures tenants are provided with a high-quality and standard of management, where issues can be reported and dealt with effectively and rapidly.

H18 A 5 (f) Bedding and linen changing and/or room cleaning services

- 33.14 On-site communal bedding and linen changing and/or room cleaning services are required because private rooms do not provide laundry facilities and tenants may have insufficient space in private rooms to store cleaning equipment. Furthermore, the option of room cleaning services ensures the product is of a high quality.

H18 A 6) - the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes

- 33.15 Units must provide basic functional and comfortable space, considering their intended use, but they should not be used as under-sized, sub-standard, self-contained homes. The Mayor's statement on Matter 36 Housing Quality and Standards explains the importance of the minimum space standards for self-contained homes. The requirements of Policy H18 A5a-g also help to demonstrate that the private unit will not be a self-contained accommodation and thus does not have to comply with the policy requirements for self-contained housing in Policy D4.

H18 A 7) - a management plan is provided with the application

- 33.16 LSPBSL development has a relatively high household density with a high frequency of residents moving in and out. A management plan is therefore important to ensure that acceptable levels of residential amenity are provided for tenants and neighbours.

H18 A 8) - it delivers a cash in lieu contribution towards conventional C3 affordable housing

- 33.17 This criterion is discussed in relation to part d) of this Matter below.

b) In the absence of the application of defined space and amenity standards, would it be effective and justified in delivering good design and the objectives of policies GG1 to GG4?

- 33.18 Yes. As noted above, LSPBSL is a relatively new housing model in London. For this reason, and for the time-being, it is necessary to assess LSPBSL proposals on a case-by-case basis, considering the criteria set out in Policy H18 A that ensures good design. Proposals for LSPBSL will be subject to a high level of design scrutiny and be expected to robustly demonstrate that the criteria in Policy H18 A has been

sufficiently met. The criteria in Part A will encourage entry into the market from genuine providers seeking to deliver a high-quality product. By extension, the criteria serve to discourage low-quality providers from seeking to deliver a sub-standard product.

- 33.19 Given the novelty of the product, the Mayor considers that there is currently insufficient evidence upon which effective design guidance for this type of development could be based. The Mayor may produce planning guidance, including space standards, for LSPBSL in future if it is deemed necessary to more effectively manage this type of development. In the meantime, individual London boroughs may wish to prepare further detailed guidance to manage LSPBSL development proposals to respond to local concerns.

c) Would the size of development defined in paragraph 4.18.3 be justified?

- 33.20 Yes. However, it should be noted that there is no requirement for LSPBSL development to provide at least 50 units. The reference to 50 units is indicative to assist decision makers in identifying developments where Policy H18 is applicable, given the fact that there is no formal planning definition for LSPBSL. It is considered that it would not be cost-effective to provide high-quality professional management services, including well-maintained functional communal spaces for LSPBSL developments of fewer than 50 homes. It is also important to differentiate between LSPBSL developments from more traditional large-scale houses of multiple occupation that do not provide services to residents.

d) Would the affordable housing requirements be effective and justified?

- 33.21 The 2012 NPPF states that, to meet local affordable housing needs, residential development should provide affordable housing on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.² Policy H18 8 requires an in-lieu affordable housing requirement because LSPBSL does not provide self-contained homes suitable for meeting affordable housing needs. This is because LSPBSL does not provide stable, long-term accommodation suitable for most households in need of genuinely affordable housing, including families. The Policy provides the flexibility for boroughs to determine whether in-lieu contributions should be provided as an upfront lump-sum payment or a long-term revenue stream to fund the delivery of conventional affordable housing.
- 33.22 Due to the immaturity of the LSPBSL market there is currently an insufficient understanding of the product to robustly set a threshold that could allow applications for this type of development to access a Fast Track Route (FTR) (see Policy H6). However, LSPBSL developments that provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review. This is considered reasonable, considering that there is no FTR option.

² NLP/GD/03: DCLG, NPPF 2012, Paragraph 50

e) Overall, would it deliver the planned level of growth to meet the objective of good growth policies GG1 to GG4?

- 33.23 It is important to note that Policy H18 does not set out a planned level of growth for LSPBSL. The policy responds to a recent market trend in order to effectively manage a new type of development in a way that delivers high-quality development that can support Good Growth. In particular, LSPBSL should contribute towards building strong and inclusive communities and creating a healthy city, in accordance with Policies GG1 and GG3. Development will contribute towards this objective through providing high-quality homes for tenants, with communal amenity space for social interaction that can support good mental and physical health. LSPBSL, where of good quality and of high standards, could contribute towards Policy GG4 by delivering more homes to meet London's diverse range of housing needs, helping to create mixed and inclusive communities.