

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M33 LARGE-SCALE SHARED LIVING DEVELOPMENT

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

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

1. London first supports the criteria listed in H18A, including the (1A) insertion in the GLA's Minor Suggested Changes that, "*it contributes towards mixed and inclusive neighbourhoods*". Collectively, all housing products should contribute to mixed and inclusive communities through the delivery of good-quality homes, including affordable housing, and a variety of size and type of units within a neighbourhood. Large-scale purpose-built shared living developments can make a valuable contribution towards the delivery of that objective.
2. The creation of mixed and inclusive communities fosters social diversity, redresses social exclusion, and strengthens communities' sense of responsibility for, and identification with, their neighbourhoods. Therefore, the requirement for large-scale purpose-built shared living developments to contribute towards mixed and inclusive neighbourhoods is justified.
3. London First also supports the deletion of "*it meets an identified need*" from the criteria in H18A and its replacement with "*it is of good quality and design*".

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?

1. London First believes that H18 in the draft Plan follows the correct approach by not referencing defined space and amenity standards for large-scale purpose-built shared living developments. Flexibility is required because each application will need to be assessed on its own merits in terms of good design. Sui generis shared living is a separate planning land use class and

asset class, residents rent bedrooms and the whole development forms their home. Therefore, space standards are not necessary or appropriate within the New London Plan.

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

1. The presumption that large-scale purpose-built shared living developments comprise at least 50 residential units is welcomed and considered to be effective. This level of accommodation and scale of development would have the capacity to support the requisite high-quality shared amenities expected by this product.

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

1. London First welcomes the clarity provided on affordable housing requirements for large-scale purpose-built shared living developments. Furthermore, London First also supports the principle of cash in lieu contributions towards the provision of C3 affordable housing elsewhere in the borough. However, policy H18A (8) should include the flexibility to provide a shared living discount market rent product on site that could help those who are unable to access social housing. The policy should also allow for cash in lieu payments to be phased rather than given as a lump sum upfront, where there is agreement between the local authority and applicant, to reflect the fact that the distinct economics of this sector will see a much longer-term return on investment compared to for-sale housing. This should be included in paragraph 4.18.8 of the supporting text.
2. Paragraph 4.18.8 should also include a provision that removes the requirement for a development that meets the relevant affordable housing thresholds cited in paragraph 4.18.8 to submit a Financial Viability Appraisal (similar to the Fast Track Approach for C3 developments including build to rent developments).
3. Finally, paragraph 4.18.9 takes into account the rental cost as a per square metre comparison with other local C3 products to use as a basis for viability. By the nature of shared-living homes being non-self-contained, this comparison must be done on a gross internal area to gross internal area calculation, not merely on the direct 'net rented area' of a room versus the net area of a C3 apartment, as this does not take into account the shared spaces which are the equivalency of the living room in standard C3 accommodation.

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

1. The inclusion of new Policy H18, and its recognition as a new source of housing supply and form of housing that can contribute towards meeting London's housing needs, is welcomed by London First. Subject to the amendments requested above, the policy will provide a justified and effective approach to the delivery of large-scale purpose-built shared living accommodation in London.
2. The acknowledgement in the Plan of shared living as a housing product will further diversify housing choice and options by providing new homes for the city's growing rental sector. Increasing the delivery of large-scale purpose-built shared living developments will also help improve the health and well-being of Londoners through enhanced social interaction and sense of community.
3. This policy will ensure that good-quality, large-scale shared living developments, with optimal public benefits, will be delivered across London in an effective, justified and controlled manner.
4. In conclusion, for the reasons above, London First welcomes the inclusion of Policy H18 in the Plan and, subject to the recommended amendments, believes that it will make a positive contribution to the Good Growth objectives set out in GG1 to GG4.