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London Plan Guidance

Large-scale purpose-built shared living

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London Plan policies

Policy H16 Large-scale purpose-built shared living.

Plan-making

Planning authorities should use this guidance to inform site allocations where large-scale purpose-built shared living (LSPBSL) is being considered and any broad locations or policies in development plan documents that relate to LSPBSL.

Planning application type and how the London Plan Guidance (LPG) will be applied

This guidance provides direction and recommended benchmarks for the design and assessment of all applications with LSPBSL. Some aspects may also be relevant to some larger proposals for houses in multiple occupation (HMOs), with more than 20 bedspaces.

Who is this guidance for?

This guidance is for planning authorities to assess planning applications with LSPBSL.

This guidance should also be used by developers, architects and designers to design and manage LSPBSL developments.

1 Introduction

1.1 About this document

1.1.1 This document provides guidance to support London Plan Policy H16.

1.2 What is large-scale purpose-built shared living?

1.2.1 Large-scale purpose-built shared living (LSPBSL), also referred to as co-living, is a type of non-self-contained housing that is generally made up of at least 50 private individual rooms and communal spaces, and facilities.

1.2.2 LSPBSL differs from other housing types, including the following:

- Self-contained housing (use class C3), because there is an emphasis on communal living. Large-scale shared dining, recreation and (sometimes) workspaces are provided to offset private individual units that are smaller than the minimum internal space standards set out in table 3.1 of the London Plan.
- HMOs, due to the size of the developments and the extent of communal spaces and facilities.
- Hotels (use class C1) and hostels (sui generis), due to the requirement for minimum tenancies of no less than three months.
- Residential institutions (use class C2), as there is no significant element of care or training provided.
- Student accommodation, as this has a focus on student needs, links with universities and the provision of specific 'affordable student accommodation' as required by the London Plan. Notwithstanding paragraph 4.15.5 of the London Plan, any product designed and marketed for students should be prepared in line with Policy H15.

1.2.3 LSPBSL generally provides accommodation for single-person households who cannot, or choose not to, live in self-contained homes or HMOs. This accommodation type may be used on a transitional basis until residents find suitable longer-term housing. Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London.¹

¹ Recognising however, that LSPBSL contributes an element of housing choice, it is counted towards housing supply on a ratio of 1.8:1 basis as per London Plan Policy H1 paragraph 4.1.9

- 1.2.4 For this reason, LSPBSL cannot be considered an affordable housing product. It does not provide accommodation suitable for households in need of genuinely affordable housing, including families.

2 Planning for LSPBSL development

2.1 Locational and access considerations for LSPBSL development

- 2.1.1 To meet the requirements of London Plan Policy H16 (part A3), LSPBSL development should be:
- a. located in well-connected, well-served areas. The site-specific context of a proposed LSPBSL development should be considered in terms of the quality and ease of access to the public transport; active travel options; and the proximity to wider amenities and facilities in the area. Areas that are likely to be more suitable for LSPBSL include:
 - i. the Central Activities Zone (CAZ) and Inner London Opportunity Areas
 - ii. Metropolitan and Major town centres
 - iii. all areas of PTAL 5 or 6 and Inner London PTAL 4
 - iv. other town centres with high or medium growth potential (see Annex 1 of the London Plan).
 - b. car-free and not contribute to car dependency, as per London Plan Policy T6(B). This will partly be achieved through the location types set out above. The mix of uses incorporated in a development can also help to increase the needs (including employment) that are met locally without requiring a car. Attention to the safety and inclusiveness of the adjoining public realm through its design and management will also be an important consideration (see section 3, below), as will servicing and deliveries (see section 5, below).
- 2.1.2 These locations may be refined further by Local Plans according to their wider spatial and housing strategies.

2.2 Contributing positively to well-designed, mixed and inclusive neighbourhoods

- 2.2.1 LSPBSL developments should be located and designed to contribute positively to the character of the area; and the creation of mixed and inclusive neighbourhoods.
- 2.2.2 To inform this, local planning authorities should draw on characterisation studies and their design-led approach to optimising site capacity (see

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policies D1 and D3 of the London Plan, and the Optimising Site Capacity: A Design-led Approach LPG).

- 2.2.3 Locationally, at the neighbourhood level, contribution to mixed and inclusive objectives requires attention to housing mix – both onsite and in the wider area, including in delivery terms.

LSPBSL can impact upon neighbourhood housing mix positively and negatively:

- a. LSPBSL can positively disperse this type of development away from any emerging clusters; or add to housing mix where it is lacking.
 - b. It may be more negative where there are emerging concentrations of this or similar accommodation relative to conventional housing. Such concentrations may be spatial (particularly at neighbourhood scale) or as a proportion of housing delivery. In these cases, LSPBSL may be considered to be ‘crowding out’ conventional housing schemes, affecting the ability to meet a range of needs.
- 2.2.4 Ideally, Local Plans should identify where spatial or delivery concentrations of LSPBSL (relative to conventional housing) may be emerging and impacting on the ability to ensure mixed and inclusive neighbourhoods. This information could be used to develop spatial policies, or to indicate the significance of neighbourhood or pipeline housing mix in decision-making.
- 2.2.5 In areas where demand for LSPBSL is likely to be particularly high, and this could have a negative impact on creating mixed and inclusive neighbourhoods, local planning authorities may, with appropriate evidence: introduce a local policy framework that limits the number of developments or units within a defined area; ensure separation; or focus LSPBSL in specific places. More positively, they can identify areas where LSPBSL could be beneficial as part of the housing mix. Any such policy should be sufficiently flexible to ensure any limits are not applied arbitrarily.
- 2.2.6 However, in the absence of a Local Plan policy, London Plan Policy H16 A(2) provides scope for Local Planning Authorities (LPAs) to consider the impact of LSPBSL on mixed and inclusive neighbourhoods on a case by case basis. This should be supported with appropriate monitoring and engagement evidence.
- 2.2.7 LPAs should also consider housing size mix (see Policy H10(A)) and the provision of onsite affordable housing (see Policy H4(B)) as part of this matter. On larger sites, particularly where opportunities to provide a mix of sizes and tenures within the borough or area are constrained, it may be appropriate to seek blocks of conventional C3 housing in addition to LSPBSL.
- 2.2.8 In addition to broader spatial strategy and housing capacity considerations, when considering these aspects of LSPBSL development, local planning authorities should draw on:
- a. information about existing and emerging housing mix by area

- b. information about the cumulative impact on services and infrastructure of existing LSPBSL and other similar housing products such as purpose-built student accommodation (PBSA)
 - c. an understanding of local housing delivery issues and the positive or negative role LSPBSL is playing, or could play, in the area, and how any restrictions might affect this
 - d. an understanding of local housing rental markets (including Build to Rent, HMO and purpose-built student accommodation demand and supply) and pressures that may be alleviated by LSPBSL development.
- 2.2.9 Once in-principle locational issues have been resolved, wider infrastructure impacts arising from the scale of the development should also be considered and addressed. This should ensure that the proposed LSPBSL development does not adversely affect the inclusive nature of a neighbourhood by affecting the ability of any residents to access the infrastructure they need.

3 Design quality

3.1 Integrating LSPBSL into the neighbourhood

- 3.1.1 LSPBSL development should positively integrate with its surroundings as part of ensuring good-quality design, in turn contributing positively to mixed and inclusive neighbourhoods (see policies H16 A(2) D1 and D3 of the London Plan, and the Optimising Site Capacity: A Design-led Approach LPG).
- 3.1.2 LSPBSL should:
- a. ensure active uses and public amenities are designed and located to activate the street; and public amenities on the ground floor should front the street or public realm
 - b. avoid inclusion of any blank walls, dense vegetative screening or other design elements that visually segregate the development from the local surroundings or vice versa should be avoided, unless mitigation against external factors such as noise or air quality is required
 - c. be encouraged to include public amenities such as restaurants, bars and communal workspace; promote use of these by the surrounding local community; and make them available to residents at no extra cost
 - d. ensure any employment-space uses complement and strengthen the local economy.
- 3.1.3 The development should ensure the public realm is designed with different users in mind, including both residents and people in the surrounding communities who use wheelchairs or who have other mobility impairments.

- 3.1.4 Where necessary, improvements to the surrounding public realm should be achieved through planning obligations to ensure good connectivity through walking, cycling, green infrastructure and other streetscape elements. This should mitigate any crowding impacts that may arise at particular times from building access or egress.

3.2 Inclusive building design

- 3.2.1 The overall building design should have regard to the needs of people with a range of disabilities and impairments. Beyond wheelchair access, this could include the impacts of other mobility, sensory, dexterity and learning difficulties; and needs arising from particular mental health conditions. Design responses should consider the use of colour, light, soundproofing and way-finding; the ease of opening doors and windows; equipment/facility height; and space for wheelchair access and manoeuvres.

3.3 Communal facilities – overview and inter-relationships

- 3.3.1 As a minimum, communal facilities should enable all residents to:
- cook, prepare and eat meals
 - relax and socialise, including with guests
 - work from home and
 - do laundry.
- 3.3.2 Table 3.2, below, sets out the required and optional types of internal communal facilities that should be included in LSBPSL development. Recommended benchmarks for communal indoor space provision, and for the design of kitchens, dining spaces, laundry facilities, living rooms, lounges and workspaces, are set out below, at sections 3.4 to 3.9; and tables 3.1, 3.2 and 3.3. These help to demonstrate ‘sufficiency’ as required by clause A (6) of Policy H16, and should relate to a maximum resident number² (see paragraph 5.1.1, below).
- 3.3.3 The recommended benchmarks are based on current best practice of operating LSPBSL developments. Some flexibility in the assessment of LSPBSL applications against these recommended benchmarks may be applied to the design, scale and provision of these facilities in consideration of the site’s location and context, or other scheme-specific factors where it is demonstrated that qualitatively good design outcomes are being achieved.
- 3.3.4 The approach to internal and external communal areas should be designed, taking into consideration the composition of the different spaces, their interrelationships across the building and their use(s). Where bedroom sizes

² This may not match the unit number given that some larger rooms may be occupied by couples.

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- are smaller, it should be expected that a higher quantum of communal space is achieved to help offset this, though a balanced approach is preferred.
- 3.3.5 Where possible, kitchen and dining spaces should be provided together, or close to each other; and should be adjoining, or adjacent to, external communal areas. This is to provide opportunities for outdoor dining, and to maximise the quality of this provision.
- 3.3.6 Communal areas should be inclusive; well designed; adequately sized; well ventilated; conveniently accessed; and sufficient to meet the requirements of the anticipated number of residents. They should be designed for flexible use, so residents can feel a reasonable degree of autonomy and are enabled to develop a sense of community. There should be the potential for different ways of using the space over the course of a day or a week, and over time. Where appropriate, communal facilities should integrate with the public realm and external spaces.
- 3.3.7 The design and location of the communal facilities should ensure equal opportunity for all and meet Policy D5 Inclusive design. This should include an adequate number of lifts; appropriately sized corridor spaces; and accessibility to all corridors, lifts, and internal and external spaces. Adaptability of communal spaces and associated facilities (e.g. table and counter height) will also be important, so that they can be altered to reflect diverse (and the potential for ever-changing) resident needs.
- 3.3.8 Where other uses are included alongside the LSPBSL, the relevant policy and guidance for those uses should be addressed separately and in addition. For example, cycle parking for offices should not be counted toward provision of cycle parking for LSPBSL units.
- 3.3.9 Provision of some public (non-resident) access to elements of the communal facilities is encouraged, to promote integration of the LSPBSL with the local area. This may be particularly appropriate for workspaces and facilities such as gyms and cafes.
- 3.3.10 Facilities open to the public may count towards resident communal space requirements where they are integrated within the LSPBSL accommodation; managed integrally by the building's manager; and accessible to residents at least 12 hours a day, and at least six days a week.

Table 3.1 Recommended benchmarks of total internal communal amenity space provision (including the table 3.2 internal amenities as indicated in column 3)

Number of residents	Benchmarked internal amenity space
Up to 100	4 sqm per resident
Every additional resident from 101 to 400	3 sqm per additional resident
Every additional resident from 401	2 sqm per additional resident

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Table 3.2 Recommended benchmarks: Communal areas and facilities

Communal area/facility	Required by policy or optional	Included in communal space requirement (table 3.1)?	Benchmark
Kitchen (section 3.4)	Required	Yes	0.5 sqm per resident, to include one cooking station per 15 residents and the other equipment identified in table 3.3
Dining space (section 3.5)	Required	Yes	Two dining spaces per cooking station; or number of dining spaces = 15% of total residents
Laundry and drying facilities (section 3.6)	Required	No (unless designed as part of a space that encourages residents to spend recreational time)	One washer and one dryer per 35 residents
Internal communal space (section 3.7)	Required	Yes	
Living rooms, lounges (section 3.7)	Required	Yes	
Other recreation or entertainment spaces for the exclusive use of residents without a charge (section 3.7)	Optional	Yes	
Workspace (section 3.8)	Optional	Yes	
Toilets (section 3.9)	Required	No	
Personal storage (section 3.9)	Optional	No	

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External communal space – terrace/garden (section 3.10)	Required	No	See table 3.4
Circulation space (corridors, stairs, lifts, lift lobbies)	Required	No	
Any spaces that residents incur additional costs to access or use	Optional	No	
Cafes, bars and restaurants or other spaces that are open to the public to use or not for the exclusive access and use of residents and their personal visitors	Optional	Conditionally yes see paragraph 3.3.10	
Storage used by management	Optional	No	
Cycle storage	Required	No	0.75 per person ³ .
Car parking	Car-free (London Plan Policy T6.1(E) Residential parking ⁴)	No	

3.4 Communal kitchens

3.4.1 Sufficient cooking facilities should be provided to meet the requirements of the residents and their visitors at a convenient and accessible location within the development. The recommended benchmark for kitchen space provision is 0.5 sqm per resident to accommodate the items outlined in table 3.3, below, with adequate circulation space.

³ Flexibility may be applied based on the site location, and where onsite shared bicycle schemes are provided as part of the development for residents' use without charge.

⁴ noting this policy still requires provision for blue-badge holder parking.

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- 3.4.2 The design, location and size of the communal kitchen facilities will depend on considerations such as floorplate size; the number of storeys within the building; and the maximum number of residents who will occupy the LSPBSL. To foster a sense of community, communal kitchen facilities should be designed to encourage group interactions.
- 3.4.3 The kitchen amenities/facilities identified below in table 3.3 are recommended good practice to ensure sufficient facilities and good design are provided. The management plan should demonstrate proposed provision and its operation will satisfy the needs of future residents and their visitors, including how the equipment will be maintained.

Table 3.3 Indicative expected kitchen amenities

Kitchen amenity	Benchmark
Hob and oven Sink and draining board	One of each per 15 residents
Fridge with freezer, Dishwasher, Microwave, Base or wall units for food and utensil storage	Located within the kitchen; as appropriate to satisfy the needs of future residents and their visitors.
Refuse space, including recycling	Located within the kitchen; as appropriate to meet the needs of all residents and their visitors.

3.5 Communal dining spaces

- 3.5.1 Dining spaces should enable people to eat where they cook. Hence, they should be provided either alongside communal kitchen facilities, or with other communal space located near the kitchen facilities.
- 3.5.2 The dining space should include space for chairs, tables and circulation, including for people with disabilities.
- 3.5.3 Any café and restaurant seating that is open to the public may be counted toward the dining space or required communal space where they meet the conditions set out in paragraph 3.3.10.

3.6 Laundry and drying facilities

- 3.6.1 Adequate laundry and drying facilities should be provided for residents at no additional charge; and should not be used by the management company for washing bedding and linen.
- 3.6.2 They should be in a convenient and ventilated location; and will not be counted toward the required communal space unless designed to accommodate recreational activities and/or social interactions. They should not interfere with other communal spaces that are used for cooking, dining, recreation or socialising.
- 3.6.3 The number of washers and dryers provided will depend on the type and size of the machines. The management plan should include information that demonstrates how the proposed provision will satisfy the needs of future residents; and how the machines will be managed and maintained.

3.7 Internal communal (social/living) space

- 3.7.1 Lounge and living spaces should be of high-quality design to encourage incidental meetings, socialising, lounging, engagement and recreation. A variety of spaces should be provided to allow for smaller group interactions; engagement for larger groups; and quieter spaces, such as prayer rooms.
- 3.7.2 Internal communal (social/living) spaces should be distributed across the development to promote use and be easily accessible to all, including disabled people. They should be adequately sized; integrated within the building design; and not provided in leftover spaces. While such space can be provided as extensions of the kitchen areas or external terraces and gardens, they should be in addition to these other communal amenities.
- 3.7.3 Communal social/living spaces should be located and designed to allow views out; and should have convenient access to cores and external communal spaces. They should have adequate passive ventilation and lighting, including natural daylight.
- 3.7.4 Sufficient and comfortable seating, in the form of sofas and lounge chairs, should be provided throughout the space to allow for lingering and comfortable interactions for the intended number of users. Quantity of seating provided should allow for residents' visitors.
- 3.7.5 Inclusion of a gym and associated fitness studio facilities in the internal communal areas is encouraged. Any such space provided should have higher ceilings, and benefit from natural lighting.

3.8 Workspace

- 3.8.1 Common work areas should be provided, where possible, to enable hybrid working environments, and avoid the use of kitchen/dining spaces for these purposes. Use of these areas should be at no extra cost to residents.

3.8.2 Such workspaces should have high-speed broadband connections. Desk spaces should be equipped with charging points; and should be fully adjustable for comfortable use over longer periods by residents of various heights.

3.9 Toilets and storage

3.9.1 Toilet facilities should be provided in proximity to communal spaces, such that they are accessible to residents when away from their own rooms, and to their guests.

3.9.2 Some additional storage areas, in the form of lockers or cupboards, should be provided for each resident to store personal belongings, including larger items.

3.10 External communal space

3.10.1 Opportunities for the provision of external communal space should be maximised, recognising its role in providing for both wellbeing and urban greening and biodiversity. Such space should be accessed directly from usable (and preferably communal) internal spaces. External communal space should be overlooked by usable internal spaces and, where possible, private units to avoid creating isolated areas that cannot be used safely.

3.10.2 High-quality, multipurpose aggregated space should be provided and designed to encourage residents to spend time on recreation, and to interact in large groups. All residents should be able to access all external communal spaces, including disabled people.

3.10.3 External communal space should be designed and landscaped to ensure useable space for residents. It should provide adequate seating, lighting and landscaping to provide a good-quality, relaxing environment. The provision of outdoor dining facilities is encouraged.

3.10.4 When landscaping is provided in external communal space, it should be designed for biodiversity net gain, as per Policy G5 Urban greening.

3.10.5 Any private balconies or terraces (for individual units) should not count towards the communal space requirement.

Table 3.4 Recommended benchmarks for external communal amenity space:

Number of residents	Benchmarked external outdoor communal amenity space
Up to 400	1 sqm per resident
Every additional resident from 401	0.5 sqm per additional resident

3.11 Private units

- 3.11.1 Policy H16 (7) requires that the private units are not self-contained homes, nor capable of being used as self-contained homes, but provide functional living space. Hence, units should be accessed through a shared internal area and not have a separate external access.
- 3.11.2 The units should be suitably sized to accommodate the amenities listed in table 3.5, below, for sleeping, eating, working, relaxing and storage. They should be no less than 18 sqm, and no more than 27 sqm, to avoid them being used as substandard self-contained units. Larger units may be suitable for occupation by couples.⁵
- 3.11.3 Private units should be designed to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions.
- 3.11.4 To meet the requirements of London Plan Policy D5, and ensure inclusive design, LSPBSL schemes should provide 10 per cent accessible units. This is in line with the approach taken for other forms of residential dwellings in the London Plan.
- 3.11.5 Accessible units are generally expected to be between 28 and 37 sqm to accommodate ease of access to the amenities listed in table 3.5, below. Units under 28 sqm may be considered where: drawings demonstrate how the rooms have been designed in accordance with Part M of the building regulations; they provide adequate space and wheelchair accessibility; and the design has been approved by an inclusive accessibility expert.
- 3.11.6 Accessible units should be distributed to the most convenient locations within the development, and in proximity to the communal accessible kitchen(s) and other shared amenity spaces.
- 3.11.7 The room amenities identified below are examples of additional indicators of good design and functional living space.

⁵ Where this is expected to be the case, plans and viability assessments should clearly state this – see paragraph 5.2.1a.

Table 3.5 Indicative expected private unit amenities

Room amenities	Additional notes
Double bed Desk with worktop space	-
Bedside cabinet	At least one is recommended
Wardrobe/clothing storage	A storage space of at least 1.2 cubic metres per person.
Seating area	An armchair
Dining area	Seating area could be used for eating. If provided, it should be limited to two people dining.
Bathroom with shower	Should have a standard size sink, a WC and a place to dry a bath towel. Bath tubs are discouraged.
Small kitchenette to allow preparation of convenience food	Should provide: sockets to plug in a toaster, a kettle and a non-convection microwave; sink and drainage space, and counter space. If hob is provided, then it should have no more than two plates. A mini fridge should fit under the kitchen counter. No freezer required.

4 Affordable housing

4.1 Contributions

4.1.1 LSPBSL follows the viability-tested route as set out within Policy H5 and H16. LSPBSL must deliver a cash-in-lieu contribution towards conventional C3 affordable housing if it is the only type of housing proposed. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either of the following payments, made to the local authority:

- an upfront cash-in-lieu payment linked to market value
- an in-perpetuity annual payment linked to actual rental income.

- 4.1.2 The expected contribution will be assessed in relation to either 35 per cent of the units, or 50 per cent where the development is on public-sector land or industrial land appropriate for residential uses, in accordance with Policy E7. The contribution is to be based on 50 per cent of the market value or rental income of the relevant proportion of units.

4.2 Other affordable housing provision

- 4.2.1 The provision of below-market rental units within the LSPBSL development is not an acceptable alternative to such an off-site financial contribution, as LSPBSL units do not meet London Plan internal space standards for C3 housing (see paragraphs 1.2.3 and 1.2.4, above).
- 4.2.2 However, if the site is suitable for incorporating other types of development in addition to the LSPBSL, on-site provision of C3 affordable housing should be considered (see paragraph 2.2.8 above). Further guidance on this situation is likely to be included in future LPG that will support the implementation of Policy H5.

5 Management plans and other application information requirements

5.1 Management plan content

- 5.1.1 Any application should include an appropriately detailed and resourced management plan that identifies:
- a. the maximum number of residents that can occupy the LSPBSL
 - b. how the proposed communal equipment, facilities and spaces, and their operation and maintenance, will satisfy the varying needs of this number of residents and their guests, on an ongoing basis;
 - c. how management practices will meet policy requirements, including to ensure that the development continues to function as a high-quality LSPBSL scheme.
- 5.1.2 The management plan should be appropriately secured through a section 106 agreement. It should detail how the LSPBSL development will be managed by a single management company, whilst allowing for appropriate transfers, in perpetuity. And it should provide for continuity of communal space, facility and service provision, including relevant aspects of the inclusive design statement, in perpetuity, regardless of changes in ownership or management.
- 5.1.3 Supporting paragraph 4.16.4 of London Plan Policy H16 advises of various issues that LSPBSL management plans should address as a minimum, in light of policy objectives. Further guidance on these and related issues is given below:

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- a. Security and fire safety procedures – this should include detail regarding:
 - i. relevant procedures for emergency and fire access and exit (this is separate from, but aligned with, the fire safety statement)
 - ii. safeguarding of external and internal communal spaces, and safety measures for private units and communal spaces
 - iii. registration of any electrical products, such as white goods, that are built into the property, and encouraging residents to do the same; this will help to pick up any recalls, and ensure safety of the residents and the building
 - iv. preparation of Personal Emergency Evacuation Plans (PEEPS) for all residents whose ability to self-evacuate may be compromised, taking into account the General Data Protection Regulations (GDPR) and the Data Protection Act (2018).
- b. Move-in and move-out arrangements, deliveries and servicing – this should include detail regarding:
 - i. the location of loading and unloading areas to ensure the public realm is not obstructed by parked vehicles, and there is no negative impact on highway or road traffic, nor on surrounding communities
 - ii. timings of move-in and move-out to avoid congestion impacts, and impacts on any other important events (e.g. cultural celebrations) in the surrounding communities
 - iii. routes and lifts to be used during move-in and move-out, to ensure the smooth operation of communal spaces and other services of the development
 - iv. security and concierge provision
 - v. storage facilities for deliveries when a resident is not immediately available.
- c. Management and maintenance of all internal and external areas of the development – this should include detail regarding:
 - i. hours of operation for various functions, allowing for appropriate cleaning and maintenance access
 - ii. resourcing of communal areas including communal cooking and dining equipment, cleaning materials and waste management receptacles

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- iii. procedures for how cooking and dining facilities will be managed and maintained to ensure all residents can comfortably cook and eat when they desire, avoiding wait times and conflict with people using the space for other purposes
 - iv. systems and procedures to ensure appropriate cooking facilities for faith-based groups, and those with particular allergies and dietary preferences – for example, by designating separate cooking stations, storage and fridge/freezers within the kitchen areas
 - v. provision of quiet spaces, with the flexibility to be used as prayer rooms if required by residents
 - vi. where a facility has an element of public use, the ways in which there will always be sufficient availability/capacity for residents first and foremost, as opposed to external users
 - vii. cycle storage provision, servicing, maintenance and upkeep
 - viii. personal storage management
 - ix. out-of-hours management
 - x. landscaping upkeep.
- d. Cleaning and linen-changing – this should include detail regarding:
- i. location of facilities for linen laundry, storage and related services
 - ii. location of facilities for waste management, refuse and recycling
 - iii. linen changing and/or room-cleaning services (e.g. a schedule)
 - iv. the cleaning of internal and external communal facilities and spaces including associated waste management provision.
- e. – this should:
- i. ensure 90-day-plus tenancy agreements for all LSPBSL units
 - ii. ensure that no part of the LSPBSL accommodation is run as a hotel or hostel
 - iii. prevent cohabiting in smaller private units, and exceedance of the maximum resident number
 - iv. prevent units being turned into self-contained units (e.g. through additional equipment being installed within them)

- v. detail how marketing will promote the inclusiveness of the development, with appropriate awareness of the accessible room provision and other features that cater to diversity of need rather than a particular demographic
- vi. provide for all services and facilities that are included in the assessment of sufficiency⁶ to be covered the rent, except utility bills for individual units (although rents may be inclusive of bills).

5.2 Other information requirements for LSPBSL planning applications

5.2.1 Drawings and tables submitted with applications for LSPBSL schemes should include the following information:

- a. private unit sizes and locations, including which of these are considered suitable for double occupancy
- b. clear identification of which spaces are counted toward the internal communal space (see table 3.1)
- c. clear identification of which spaces are counted toward the external communal space (see table 3.4)
- d. clear identification of which spaces are communal spaces – semi-public or public – that are being used by non-residents of the LSPBSL development
- e. size and distance calculations that demonstrate how the kitchen facilities are sufficient and appropriately located
- f. calculations that demonstrate how the facilities are sufficient for the intended number of users, including residents' visitors, with reference to the guidance benchmarks.

⁶ See paragraph 3.3.2 above.

Equality Impact Assessment (EqIA) for London Plan Guidance

1 Overview

London Plan Guidance name: Large-scale purpose-built shared living LPG

Stage: Post-Consultation

Date of EqIA assessment: Last updated January 2024

Please provide a brief outline of the guidance:

The large-scale purpose-built shared living (LSPBSL) LPG sets out to support the implementation of London Plan Policy H16. In doing so, it recognises the role of such accommodation as part of London's broader housing ecosystem; and seeks to achieve consistent quality and inclusivity in delivery as part of wider Good Growth objectives. It does so by clarifying policy expectations around mixed and inclusive neighbourhoods; design and sufficiency of facilities; and management, providing benchmarks to assess scheme proposals against. It also seeks to address the balance with other planning considerations that relate to other types of housing need, recognising that over-concentration and dominance of LSBPSL can nonetheless be problematic if unmanaged.

Who is the guidance aimed at?

The primary audience is Local Planning Authorities and others involved in bringing forward proposals for LSPBSL. The guidance is to help them best address housing needs through this type of accommodation, as part of a wider approach to housing and regeneration. This audience may include developers, providers and funders.

What are the key issues to be aware of?

This EqIA takes a general approach, loosely based on the assumption that LSPBSL is generally designed to meet the needs of single-person households seeking a significant degree of interaction with others in a similar position. However, the caveat is that this accommodation type has a unique purpose, and is not required to meet housing standards. It should be noted that as the guidance has been revised post-consultation to reflect consultation responses, the assessment has been approached afresh, drawing on updated evidence. However, the original EqIA is available on the LPG webpage.

The draft guidance has been amended post-consultation to address concerns raised during the consultation that the single-occupancy requirement amounted to indirect discrimination in relation to marital status. Whilst marriage and civil partnership is a protected characteristic under the Equality Act 2010 (the Equality Act), it is not covered in the same way to other protected characteristics by the public sector equality duty (PSED). In relation to marriage and civil partnership, a body subject to the PSED need only comply with its first aim (and only in relation to work). This aim is limited in scope to circumstances where the Equality Act makes discrimination, harassment, victimisation or other prohibited conduct because of a particular protected characteristic unlawful.

Nonetheless the single-occupancy requirement has been removed from the guidance. The LPG has also been amended to encourage appropriate awareness-raising of wheelchair-

accessible accommodation, and other inclusive design features, to broaden the inclusivity of the accommodation provided in practice. References to design being affected by target demographic considerations have also been removed. While LSPBSL schemes are not restricted to any particular user groups by occupation or specific need, they generally cater to a younger age demographic of working people. They are currently targeted at this group through marketing material that should, in future, reflect the full range of individuals who could benefit from it. This reflects consultation responses, as set out in the consultation report at appendix 1, rather than issues identified in the original EqIA.

There are still relatively few LSPBSL schemes in operation (there were even fewer at the point of consultation in early 2022). Therefore, it will remain important to be alive to any emergent issues not anticipated by the engagement and updated assessment to date. This is the role of ongoing monitoring and engagement.

Which of the Public Sector Equality Duty (PSED) aims,¹ considered in turn, are relevant to the guidance and the impacts identified?

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by or under the Equality Act.

Yes

2. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.

Yes

3. Foster good relations between people who share a relevant protected characteristic and those who do not.

Yes

2 Assessment

List aspects of the guidance that might impact those with protected characteristics or other identified group(s).²

¹ Please see Appendix C for legal context/background information.

² Including those that share a protected characteristic listed in the Equality Act (see Appendix C for definitions), and other groups that are likely to be affected by equalities issues, such as people on low incomes; carers; refugees and asylum seekers; looked-after children; care leavers; UK Armed Forces veterans; homeless people and rough sleepers; and ex-offenders/people with experience of the criminal justice system.

Table 1: Summary assessment of post-consultation draft guidance

Guidance key aspects, chapter headings, theme etc	Group(s) that could be impacted
<p>Fostering mixed and inclusive neighbourhoods through advising on plan-making and other consideration of over-concentration of LSPBSL and ensuring appropriate affordable housing contributions. Also consideration and addressing of infrastructure impacts.</p>	<p>Positive: All groups, helping to ensure different housing needs are balanced across an area rather than overly dominated by a particular type, and that authorities are overall more able to meet a range of needs. Neutral: All groups – infrastructure impacts addressed.</p>
<p>Design Standards: requiring sufficient and comfortable facilities with good design quality. Improved certainty/consistency particularly relating to facilities/space provision through assessment benchmarks to guide design and assessment of schemes.</p>	<p>Positive: All groups – given that all should be able to benefit as visitors, though low-income groups (noting intersectionality with other protected characteristics) may be less able to access the accommodation as residents.</p>
<p>Inclusive design and management advice relating to the accommodation, (including housing mix) public spaces and integration with the wider neighbourhood</p>	<p>Positive: Disabled people with particular access needs and religious groups requiring prayer/worship space – highlights design considerations that recognise the way that different people use their accommodation/communal and public space varies, and different needs that should be met, avoiding conflict.</p> <p>All should benefit from design seeking to foster a sense of community – encouraging interaction between different groups and the fostering of mutual understanding.</p> <p>All should benefit from design advice concerned with making public spaces more safe and secure, and especially groups that have particular personal safety concerns related to their protected characteristics, including LBGT+ people, women, disabled people and those from Black, Asian and minority ethnic groups.</p>

It should be noted that the general policy requirement and principles are already required through the London Plan. This LPG is providing further detail on how the policies should be implemented, and therefore further amplifying the effects.

2.1 Equality impacts, mitigating actions and justification

This section sets out the positive and negative impacts of the implementation of this (post-consultation draft) guidance for specified groups (including those that share a protected characteristic).

Evidence (including engagement)³ is cited, where possible, for impacts. For negative impacts, mitigating actions to minimise or eliminate negative impacts are identified, along with any action plan. If negative impacts cannot be mitigated, an [objective justification](#) is provided. For positive impacts, considerations is given to how these could be maximised.

The impacts are scored as follows:

- Strong positive
- Positive
- Neutral
- Negative
- Strong negative
- Mixed (both positive and negative impacts identified) or uncertain

Further explanation of the PSED aims and definitions of protected characteristics can be found in Appendix C.

Age (consider particularly children, under-21s and over-65s)

Potential positive impacts and scores

The guidance should result in an increase in good-quality LSPBSL benefiting those of all age groups, though acknowledging younger people are particularly attracted to this housing type. This should improve their housing choice and wellbeing, as derived from managed brand quality; an emphasis on a variety of spaces for social interaction; and predictable billing for energy and other utilities. (Strong positive.)

The revised guidance also recognises that some other people, including older people and others experiencing life changes (e.g. bereavement, changes in relationships, moves to a new city) may also benefit from this housing typology; and that design, management and marketing should acknowledge this to make it more inclusive in practice. (Positive.)

There may also be indirect impact on the HMO private rental sector, alleviating competition and upward pressures on rents. This may also benefit the housing choice and wider quality of life of some young people and others (including older people) that resort or choose to live in this type of housing. (Positive.)

Affordable accommodation payments in lieu, and encouraging on-site conventional C3 provision where the site is sufficiently large, should also help address wider supply of affordable housing. This may be particularly relevant for those from backgrounds affected by other inequalities arising from protected characteristics resulting in low incomes (see below). (Positive.)

This benefit may also arise from the guidance advising on wider housing-mix considerations that can help address imbalances at a neighbourhood level; and/or in

³ See Appendix A and B.

delivery that may otherwise have reduced the housing choice in some areas for families and older people. This can contribute to neighbourhoods that are more mixed and inclusive, addressing social exclusion and poverty. (Positive.)

Considering resident and visitor needs in the design and provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding (Positive.)

Guidance encouraging the design and management of successful mixed-use developments, integrated with wider neighbourhoods, should also help address the housing, employment and social infrastructure needs of all Londoners, including older people. This can in turn help to promote a culture of equality; and reduce poverty and social exclusion experienced by these older people. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, such as disruption and crowding that may particularly affect older people with mobility impairments and children in buggies. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and Transport for London (TfL) advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

None identified

Relevant PSED aim(s)⁴

- 2 (a)
- 2 (b)
- 2 (c)
- 3

Disability (consider different types of physical, learning or mental disabilities)

Potential positive impacts and scores

The application of the housing mix and inclusive (building scale) design guidance should increase and improve provision for disabled people seeking to live in a more social form of accommodation. This recognises that private-sector HMOs (the typical alternative to LSPBSL) are often in older, inaccessible housing stock, affecting equality of opportunity for disabled people. This should widen their housing choice; improve their ability to live away from their family home if best suited to their needs and career plans; and improve their

⁴ See Appendix C for the PSED aims.

ability to socialise with people in similar circumstances and other benefits of living in and visiting LSPBSL. (Strong positive)

Inclusive design guidance, including that relating to flexibility to meet different needs and ensure adequate size, quality and accessibility of spaces and facilities, considering resident and visitor needs, should improve the inclusion, health and wellbeing of all residents, and may particularly benefit those with mental health conditions. The management plan guidance that seeks awareness-raising through marketing of inclusive design features to broaden the demographic reach of the accommodation should also help reinforce this. (Positive.)

The potential indirect impacts on the HMO private rental sector, alleviating competition and upward pressures on rents, may also benefit the housing choice and wider quality of life of disabled people – given households affected by health and disability deprivation are significantly present in the private rental sector. (Positive.)

Disabled people may also benefit from the guidance advising on housing-mix considerations that can help address imbalances at a neighbourhood level; and/or in delivery that may otherwise have reduced their housing choice in some areas. They may also benefit from the guidance regarding quality design that should help LSPBSL proposals contribute positively to wider neighbourhood inclusivity and activity, in terms of access and ability to meet different life needs. This should help to reduce social inclusion and foster good relations between different groups in the community. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, such as disruption and crowding that may particularly disabled people with mobility impairments or others that find crowds and other disruption challenging. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)
- 3

Gender reassignment

Potential positive impacts and scores

Those undergoing gender reassignment may experience harassment in public spaces. Trans people in particular are more likely to experience threats of physical or sexual harassment or violence. The guidance encourages activation and surveillance of public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect some trans people. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (c)
- 3

Marriage and civil partnership

Potential positive impacts and scores

The consultation draft guidance previously specified that rooms should be secured for single occupation only. Consultation responses raised this as a negative impact amounting to potential indirect discrimination in relation to marital status. Whilst marriage and civil partnership is a protected characteristic under the Equality Act, the PSED (as explained above) does not cover it in the same way as other protected characteristics.

Nonetheless the single-occupancy requirement has been removed from the guidance, enabling some larger rooms to be let to couples, improving their housing choice. Guidance that management plans should include appropriate marketing provision to improve awareness of inclusive design features (which may include larger rooms) should also help reinforce this. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion for all. (Positive.)

Potential neutral impacts and scores

The guidance recognises that this housing typology is typically aimed at single-person households. This does not in itself affect the ability of married persons to access it. (Neutral.)

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts for all. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (b)
- 2 (c)
- 3

Pregnancy and maternity

Potential positive impacts and scores

Inclusive design and management guidance, particularly that relating to external public realm and internal/external communal spaces, considering resident and visitor needs, should benefit all – including those with pregnancy and maternity-related mobility impairments and particular access (e.g. pram/pushchair related) needs. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affects some women. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (b)

Race

Potential positive impacts and scores

Provision of LSPBSL, and its potential impact on alleviating pressures on the private rental (HMO) sector that affect rents (pushing them upwards) and competition for housing, are likely to particularly benefit ethnic groups that disproportionately rely on this tenure to meet their housing needs. In London this is non-British White and Chinese groups. Black, Asian and Minority Ethnic groups are disproportionately affected by homelessness, in part due to unaffordable rent increases; these groups may also benefit through this mechanism. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

People from Black, Asian and Minority Ethnic backgrounds may also benefit from the guidance advising on housing-mix considerations that can help address imbalances at a neighbourhood level; and/or in delivery that may otherwise have reduced their housing choice in some areas. This may be particularly relevant in respect of C3, affordable housing, which some Black, Asian and Minority Ethnic groups are more in need of – given ongoing labour market inequalities and other impacts of discrimination. (Positive.)

Guidance helping to foster the design and curation of successful mixed-use inclusive neighbourhoods (through the design and management of LSPBSL) will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect some ethnic groups, helping to foster good relations within the neighbourhood. (Positive.)

People from Black, Asian and Minority Ethnic backgrounds may experience harassment in public spaces. The guidance encourages activation and surveillance of public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements; and on cultural events in surrounding communities that may be associated with particular ethnic groups. This guidance should neutralise these potential impacts,

particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (c)
- 3

Religion or belief

Potential positive impacts and scores

To the extent that households holding particular religious beliefs belong disproportionately to Black, Asian and Minority Ethnic groups, they are likely to experience similar impacts to those identified for Black, Asian and Minority Ethnic backgrounds. (Positive.)

Inclusive design guidance within the document encourages consideration of diversity of needs – including for designated cooking/food storage and preparation associated with particular religious practices; and for suitable prayer/worship space. The management plan guidance that seeks awareness-raising through marketing of inclusive design features to broaden the demographic reach of the accommodation should also help reinforce this. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect some communities. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements; and on cultural events in surrounding communities that may be associated with particular religious groups. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (b)
- 2 (c)
- 3

Sex

Potential positive impacts and scores

Women may experience harassment and other threats in public spaces. The guidance encourages activation and surveillance of through routes and other public spaces. This should help address vulnerability, and help women feel more safe and secure in public spaces. (Positive.)

A positive benefit may also arise from guidance addressing imbalances in housing mix and delivery, which may have reduced choice in some areas. This may be particularly relevant in respect of C3, affordable housing, which some women are more in need of – given women are more likely to be economically inactive, low-paid, and/or subject to the poverty that affects single-parent families. This should contribute to neighbourhoods that are more mixed and inclusive addressing social exclusion and poverty. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affects some women. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (c)

Sexual orientation

Potential positive impacts and scores

Those who are LGBTQ+ may be more likely to experience harassment in public spaces. The guidance encourages activation and surveillance of public and external communal spaces. This should help address vulnerability; and help people feel more safe and secure in public spaces. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect some LGBTQ+ people. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements, and on events in surrounding communities which may be associated with particular groups. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (c)
- 3

People on low incomes⁵

Potential positive impacts and scores

Low-income groups may also benefit from the indirect impact of alleviation of pressures on the private rental HMO sector, where many (particularly those not on benefits) may be particularly focused, and vulnerable to homelessness, given their income situation where rental rises may easily tip into unaffordability. (Positive.)

People from low-income backgrounds may also benefit from the guidance advising on housing mix considerations that can help address imbalances at a neighbourhood level; and/or in delivery that may otherwise have reduced their housing choice in some areas. This may be particularly relevant in respect of C3, affordable housing, which low-income groups are more in need of. (Positive.)

Guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect some people. (Positive.)

In addition, considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

The guidance also advises on design and management plan mitigation of issues associated with the impact of a large development on the wider neighbourhood. This includes the impact of servicing and resident access/egress on surrounding streets and pavements. This guidance should neutralise these potential impacts, particularly when acting in tandem with broader design and TfL advice on streets. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 2 (a)
- 2 (c)

⁵ The socio-economic duty was introduced into legislation as Section 1 of the Equality Act, with the aim of ensuring that public bodies had to take socio-economic disadvantage into account when making strategic decisions. However, following a change in government in 2010, the new coalition government decided not to implement the socio-economic duty. Though not a protected characteristic in the Equality Act, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore considers equality impacts on people on low incomes as part of its decision making.

Other groups such as carers; refugees and asylum seekers; looked-after children; care leavers; UK Armed Forces veterans; homeless people and rough sleepers; and ex-offenders/people with experience of the criminal justice system

Potential positive impacts and scores

People with vulnerabilities including refugees and asylum seekers are identified as disproportionately housed in the private rental sector, and in the lowest income brackets, so may benefit from an increase in this type of provision that indirectly alleviates pressure on the private rental HMO sector. This may help address upward pressure on rents and competition that affects people's disposable income and propensity to homelessness. (Positive.)

There may be further benefits through the guidance advising on housing-mix considerations that can help address imbalances at a neighbourhood level; and/or in delivery that may otherwise have reduced the housing choice in some areas. This may be particularly relevant in respect of C3, affordable housing, which many of these groups should be able to benefit from given their priority status on council housing waiting lists. (Positive.)

Considering resident and visitor needs in the provision of communal facilities should enable social interaction between people with different characteristics, improving social inclusion and fostering mutual understanding. (Positive.)

In addition, more generally guidance regarding design and curation of successful mixed-use inclusive neighbourhoods, through the design and management of LSPBSL, will help address the employment and social infrastructure needs of all Londoners. This in turn should help to promote a culture of equality; and reduce poverty and social exclusion, which disproportionately affect these groups. (Positive.)

Potential neutral impacts and scores

The guidance advises that infrastructure impacts should be considered and addressed, as part of ensuring the scale of the development does not adversely impact the ability of anyone in the neighbourhood to access the infrastructure they need. This should avoid any adverse impacts. (Neutral.)

Potential negative impacts, mitigations or objective justification and scores

No impacts identified.

Relevant PSED aim(s)

- 1
- 2 (a)
- 2 (c)
- 3

2.2 Overview of equality impacts

Table 2: overview of equality impacts

Protected characteristic/group	Strongly positive impacts	Positive impacts	Neutral impacts	Negative impacts	Strong negative impacts	Mixed or uncertain impacts
Age	Yes	Yes	Yes	-	-	-
Disability	Yes	Yes	Yes	-	-	-
Gender reassignment	-	Yes	Yes	-	-	-
Marriage and civil partnership	-	Yes	Yes	-	-	-
Pregnancy and maternity	-	Yes	Yes	-	-	-
Race	-	Yes	Yes	-	-	-
Religion and belief	-	Yes	Yes	-	-	-
Sex	-	Yes	Yes	-	-	-
Sexual orientation	-	Yes	Yes	-	-	-
People on low incomes	Yes	Yes	Yes	-	-	-
Other groups	-	Yes	Yes	-	-	-

Cumulative impacts

Cumulative, aggregate and in-combination impacts have been considered; and, where relevant, seem generally likely to reinforce positive benefits (e.g. the combination of design and management features, and marketing material that raises awareness raising).

3 Amendments

No further changes made due to overall positive impacts. However, note the amendments highlighted in the introduction that have addressed equalities concerns raised in the consultation/the earlier EqIA.

4 Recommendation

The EqIA of this draft guidance proposed for publication (which has been updated post-consultation) has not identified any potential for discrimination or negative impact, and all opportunities to advance equality have been taken. As such officers recommend that the guidance can be published in its proposed form.

5 Monitoring

Monitoring will take place through the London Plan Annual Monitoring Report and wider monitoring of the Mayor's other strategies, as well as part of reviewing the London Plan. The evidence base on housing need (including composition by group characteristic) will continue to be developed, and will further help to identify and monitor relevant trends.

6 Appendix A: Evidence Reference and Content

6.1 Evidence

Age

London has a relatively young population. The median age of Londoners is 35, compared to a national average of 40. Under-25s make up 30 per cent of London's population; those aged 65-plus make up 12 per cent.⁶

Those aged 16-24 are more likely to be unemployed than those aged 25-64.⁷

Younger Londoners face higher housing costs than older groups: those aged 16-49 spend, on average, 29 per cent of their net income on housing costs, compared to 24 per cent for 50-64 year olds and 17 per cent for those aged 65-plus.⁸

Rates of overcrowding are higher in London than anywhere else in the country. Households with children are more likely to be overcrowded than households with no children. In London, 26 per cent of all households with dependent children are considered overcrowded, according to the bedroom standard measure, compared to 4.2 per cent of households without dependent children.⁹

At the end of March 2023 there were just over 60,000 homeless households living in temporary accommodation arranged by London boroughs, including 76,970 children.¹⁰ In 2022-23, households with dependent children comprised more than 89 per cent of households accepted as statutorily homeless.¹¹

Those under 24 are now less likely to live in the private rental sector than they would have been 20 years ago – and more likely to still live at home due to rising costs. Older people make up an increasing proportion of private renters, so this may change over time.¹²

Around one in four children are in persistent poverty. Child poverty overall stands at around 33 per cent.¹³

The proportion of London's pensioners in poverty is 23 per cent: just above that of the working-age population. One in nine London pensioners are living in material deprivation, unable to access the necessities for today's society.¹⁴

A higher proportion of older Household Reference Persons aged 65 and over own, rather than rent, their home (67 per cent with 33 per cent); though 25 per cent live in social rented housing.¹⁵

⁶ [ONS, 2021 census](#)

⁷ ONS/London Datastore, [Unemployment numbers and rates by equalities group LFS](#)

⁸ Resolution Foundation, [Intergenerational audit for the UK: Data dashboard, 2023 \(data to 2017\)](#)

⁹ ONS, [Census 2021: Household Composition Occupancy Rating by region](#)

¹⁰ GLA Housing and Land, [Housing in London 2023](#), October 2023

¹¹ DLUHC, [Homelessness Live Tables](#), 2023

¹² ONS, [UK private rented sector – 2018](#), 18 January 2019

¹³ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

¹⁴ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

¹⁵ ONS, [Census 2021: Household composition, occupancy rating for bedrooms and tenure of household](#)

Disability

Disabled people are more likely to live in the social rented sector compared with their non-disabled counterparts. Across the UK, nearly one in four disabled people aged 16 to 64 (24.9 per cent) rent social housing, compared with fewer than one in 10 non-disabled people (7.9 per cent).¹⁶ In London, this proportion rises to nearly one in three (30 per cent)¹⁷

The proportion of disabled people living with their parents has risen from 12.4 per cent in 2013-14 to 16.4 per cent in 2020-21. By contrast, the proportion of non-disabled people living with their parents is more or less unchanged (from 18.2 per cent to 19.2 per cent in the same period).¹⁸

Disabled residents are more likely to be living in poverty: 33 per cent of Londoners who live in families where someone is disabled are living in poverty after housing costs, compared to 22 per cent of those in families where no one is disabled.¹⁹

Households in London where at least one member uses a wheelchair some or all of the time are more likely to be dissatisfied with their accommodation than households where no one uses a wheelchair.²⁰

Gender reassignment

In 2022-23, the police recorded 4,732 hate crimes against transgender people across England and Wales: an increase of 11 per cent from the previous year.²¹ Probable underreporting means this figure is likely low (out of 108,100 responses to the 2017 National LGBT Survey, 88 per cent of transgender people did not report the most serious type of incident).²² Transgender people are more likely to experience threats of physical or sexual harassment or violence compared with the LGBT community as a whole.²³

Stonewall research in 2018 found that 25 per cent of trans/non-binary survey respondents were discriminated against when looking for a house or flat to rent or buy in the last year. In the survey, 20 per cent reported that they had experienced discrimination while looking for a new home.²⁴

Marriage or civil partnership

No relevant data.

Pregnancy and maternity

No relevant data.

¹⁶ ONS, [Outcomes for disabled people in the UK: 2021](#), 10 February 2022

¹⁷ ONS, [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), 2021

¹⁸ ONS, [Table 6: Housing Situation of people aged 16 to 64 by disability status and English region](#), 2021

¹⁹ Trust for London, [Proportion of Londoners in poverty in families with and without disabled persons](#), 2023 (based on three-year averages to 2021-22 excluding 2020-21, using DWP data)

²⁰ GLA Housing and Land, [Housing in London 2023](#), October 2023

²¹ Home Office, [Hate crime, England and Wales, 2022 to 2023 second edition](#), updated 2 November 2023

²² Government Equalities Office, [National LGBT Survey: Research report](#), updated 7 February 2019

²³ Stop Hate UK, [Transgender Hate](#)

²⁴ Stonewall, [LGBT in Britain – Trans Report](#), 2018

Race

On average, Black Londoners and those from most other minority ethnic groups experience worse housing conditions, less tenure security, higher rates of housing need, worse affordability and lower wealth than White Londoners.²⁵

Currently, 39 per cent of Black, Asian and Minority Ethnic Londoners live in relative poverty after housing costs, compared to 21 per cent of White Londoners.²⁶ 2023 surveys found that Londoners from a Black or Asian ethnic background were more likely than people from White, other or mixed ethnicity backgrounds to have struggled to meet housing payments in the last six months. They were also less confident about meeting them without a struggle in the next six months.²⁷

The poverty rate in London, after housing costs, was 38 per cent for Black households, and 33 per cent for Asian households, compared to 18% for White household. For single parents it was 47 per cent. Poverty rates also varied significantly across London's boroughs.²⁸

So whilst there is a problem of relative low income (household income before housing costs) in populations with a Black, Asian and mixed/other minority ethnic background, these groups are also more affected by London's high housing costs than White Londoners, as illustrated in the chart below. This particularly shows the issue within the private rental sector, and the insulating effect of home ownership.²⁹

Black households in London are significantly more likely than those of other ethnicities to report moving because their landlord ended the tenancy or evicted them. They are also more likely to say they expect to be treated worse by private landlords than people of other races.³⁰

Households headed by someone who is Black are around 150 per cent more likely to be owed a homelessness duty.³¹ 1.6 per cent of all householders in London were assessed as owed a homelessness duty in London in 2019- 20, but this rate varies enormously by ethnicity – from less than one in every 1,000 for Chinese, Indian and White British households to four or five in every 100 for Black and Mixed ethnicity households. 17 per cent of Black households living in private rented or social housing in London say they have been homeless at some point in their lives, compared to 8 per cent of Asian households, 6 per cent of White households and 9 per cent of mixed/other ethnic minority households.³²

²⁵ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022

²⁶ (source: GLA analysis of Households Below Average Income data (End User dataset), Homes for Londoners: Affordable Homes Programme 2021-2026 Equality Impact Assessment)

²⁷ GLA, [Housing in London 2023](#), October 2023

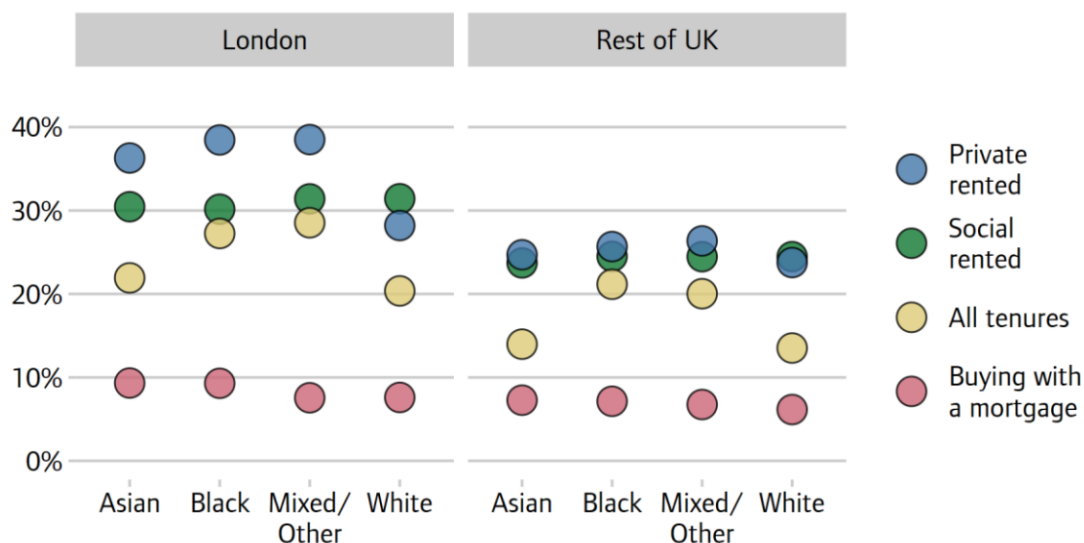
²⁸ Trust for London, [Who is in poverty in London?](#), 21 July 2023 (using 2021-22 data)

²⁹ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022

³⁰ GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using English Housing Survey 2014-18)

³¹ GLA Housing and Land, [Housing in London 2023](#), October 2023

GLA, [Housing and race equality in London: An analysis of secondary data](#), March 2022 (using data from the English Housing Survey and the DLUHC)



Median of housing costs as a proportion of household income, London and rest of UK 2015-16 to 2019-20. Source: Households Below Average Income

Households that were not from a White British ethnic background in the three years to 2021 were 60 per cent more likely to be overcrowded than the London average.³³ More specifically, Londoners from Bangladeshi and Black African backgrounds were among those most likely to say they are living in crowded homes.³⁴

English Housing Survey data (2015-17) shows that, in every ethnic group, private renters were the most likely to live in homes below the decent homes standard; and Black and Asian households in private rented housing were particularly likely to live in ‘non-decent’ homes.³⁵

Religion or belief

To the extent that Londoners holding particular religious beliefs belong disproportionately to Black, Asian and Minority Ethnic groups (Census 2021), the relevant data overlaps.

There has been limited data releases with the breakdown in relation to housing statistics, but people of Muslim faith are disproportionately likely to be homeless (19 per cent of homeless people are Muslim, compared to 15 per cent of the population).³⁶ This is also the case with housing deprivation more generally, which shows 35 per cent of Muslim-only households are deprived in one or more domain (over-crowding, no central heating, shared dwelling) compared to an average of 17 per cent for all other households with any other single religion or no religion.³⁷

³³ DLUHC, [Overcrowded households](#), 2 August 2023

³⁴ GLA, [Housing in London 2022](#), October 2022 (from 2021-22 London survey data).

³⁵ GLA Housing and Land, [Housing and race equality in London: An analysis of secondary data](#), March 2022

³⁶ ONS, [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

³⁷ ONS, [Census 2021: Combination of religions in household and household deprived in the housing dimension](#)

Sex

Female-headed lone-parent households in London comprise 22 per cent of all households accepted as statutory homelessness in 2022-23 (compared to 2 per cent of male-headed lone-parent households) while single males comprise 38 per cent of households assessed as owed a duty.³⁸

Sexual orientation

In 2022-23, 24, the police recorded 24 102 hate crimes related to sexual orientation across England and Wales.³⁹ Over two-thirds of same-sex couples have modified their behaviour in public towards their partner (for example, avoided hand-holding) for fear of hate crime.⁴⁰

People on low incomes

The proportion of Londoners saying they were 'financially struggling' increased from 12 per cent in January 2022 to 17 per cent in January 2023. Londoners living in social rented accommodation and with a gross household income of less than £20,000 remain most likely to be 'financially struggling'. In January 2023, over half of Londoners (54 per cent) said they struggled to pay for food and essential items, up from 39 per cent in January 2022.⁴¹

In 2021-22, 25 per cent of Londoners had a maximum of £1,500 in savings. This is a significant reduction from 33 per cent in 2018-19. Black Londoners were the ethnic group most likely to be in this category.⁴²

Despite higher average incomes, more expensive housing means that the 2021-22 poverty rates in London almost doubles when housing costs are taken into account (from 14 per cent to 25 per cent), meaning London has the highest regional poverty rate in the UK.⁴³ Around one in six Londoners are in persistent poverty.⁴⁴ As detailed in other sections above, for some groups poverty rates are even higher.

Lower-income households are more likely to rent, with roughly the same proportion in social rent and private rental tenures (38 per cent and 37 per cent respectively) – the latter has significantly increased in recent years. Of all tenures, poverty rates are highest for those in social rented housing (49 per cent), compared to 31 per cent of those in privately rented, and 11 per cent of owner-occupiers.⁴⁵

Estimates suggest that London households in poverty (those with incomes that are up to 60 per cent below the median), on average, spend 54 per cent of their total net income on housing costs, compared with just 13 per cent for the rest of the population.⁴⁶

³⁸ DLUHC, [Tables on homelessness](#), last updated 30 November 2023

³⁹ Home Office, [Hate crime, England and Wales, 2022 to 2023 second edition](#), updated 2 November 2023

⁴⁰ Government Equalities Office, [National LGBT Survey: Research report](#), updated 7 February 2019

⁴¹ See GLA Poll Results surveys at [London Datastore](#)

⁴² GLA: London Datastore, [Survey of Londoners 2021-22](#)

⁴³ Trust for London, [Poverty rates by region](#), 2023

⁴⁴ GLA: London Datastore, [Poverty in London 2021/22](#), 27 March 2023

⁴⁵ Trust for London, [Housing](#), 2023 (using three year average to 2021-22 excluding 2019-20)

⁴⁶ Trust for London, [Relative housing costs](#), 2023 (using three-year rolling averages 2017-18 to 2019-20)

Other groups

Asylum seekers and refugees

Asylum seekers have rapidly increased in the last few years, nationally and in London.⁴⁷ Accommodation provision is typically through hotel (initial) and private rental (dispersed) contracts, as asylum seekers do not have access to other housing until they are granted refugee status. At this point, the rapid withdrawal of direct state support (within 28 days) can often lead to homelessness as refugees, given the lack of time to find employment and, linked to this, alternative accommodation.⁴⁸

Research from 2018 found that refugees and asylum seekers in the bottom one third of before housing costs income groups, are disproportionately housed in the private rental sector.⁴⁹

According to the 2021 census, Londoners whose first language is not English make up 35.1 per cent of those who are homeless – but only 26.6 per cent of the overall population. This disproportion is more pronounced among those with the least proficiency in English, who constitute 11.8 per cent of those who are homeless but only 4.2 per cent of the overall population.⁵⁰ This is likely to be a partial proxy for asylum seekers and refugees who may have had less opportunity to gain language fluency.

Carers

The current cost-of-living crisis means that carers are facing unprecedented pressure on their finances: 25 per cent are cutting back on essentials such as food and heating; and 63 per cent are extremely worried about managing their monthly costs.⁵¹

In addition, caring also comes with additional costs that can have a significant impact on carers' finances, and many carers suffer financial hardship: 44 per cent of working-age adults who are caring for 35 hours or more a week are in poverty.⁵² Carer's Allowance, the main carers' benefit, is £76.75 per week (2023-24) for a minimum of 35 hours. It is the lowest benefit of its kind. In the UK, 977,506 carers were in receipt of Carer's Allowance in 2022.⁵³

Being a carer also links to sex as a protected characteristic, as unpaid carers are more likely to be women (according to the 2021 census, 59 per cent of unpaid carers are women).

In terms of housing, a 2016 report by Carers UK found:

- one in five carers (18 per cent) are waiting for adaptations to be made to their homes

⁴⁷ London Councils, [Asylum Seekers and refugees in London](#); House of Commons Library, [Asylum statistics](#), 12 September 2023

⁴⁸ Refugee Council, [Top facts from the latest statistics on refugees and people seeking asylum](#)

⁴⁹ University of York Centre for Housing Policy, [Vulnerability amongst Low-Income Households in the Private Rented Sector in England](#), 2018

⁵⁰ ONS, [People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables](#), 6 December 2023

⁵¹ Carers UK, [State of Caring](#), November 2022

⁵² Joseph Rowntree Foundation, [UK Poverty](#), 18 January 2022

⁵³ DWP, [Stat-Xplore](#), retrieved in February 2022

- 10 per cent said that their home was in poor condition, damp or disrepair, rising to 15 per cent of carers renting privately
- 15 per cent said there isn't enough space for someone to provide overnight care, rising to 19 per cent of carers living in social housing
- 13 per cent said that as a result of caring there isn't enough space to live comfortably, rising to 18 per cent of carers living in social housing.

Veterans

Veterans are likely to disproportionately need specialist adapted housing, which may be particularly lacking. Additionally, some are at increased risk of homelessness due to a lack of knowledge around the civilian housing sector, welfare system and budgeting; and a reluctance to seek help early.⁵⁴

Care leavers

Poor housing options and provision for care leavers persists. It is often far from social networks, and comprised of stressful environments that have knock-on effects to mental health.⁵⁵

Looked-after children

There is concern for the distribution of housing options, including sufficient in-borough provision (e.g. foster care) which is likely to correlate with the availability of affordable housing. Statutory guidance assumes that foster carers can access the homes they need, including affordable homes, in each borough. Given the need for affordable homes across London, this seems unlikely.⁵⁶ However, further evidence is however needed.

Homelessness

The number of individuals seen sleeping rough in London rose substantially in 2022-23, to over 10,000, continuing the long-term trend. At the end of March 2021, more than 60,000 homeless households were being housed by London's local authorities in temporary accommodation.⁵⁷

6.2 Gaps in evidence

LGBTQ+

There is a lack of data on the extent to which those who identify as LGBTQ+ find it harder to access suitable and affordable housing, compared with other groups. This makes it difficult to reliably identify potential impacts in this domain, though some wider issues can be surmised in relation to broader experiences in public spaces.

Marriage and civil partnership

⁵⁴ Ministry of Defence, [Statutory Guidance on the Armed Forces Covenant Duty](#), November 2022

⁵⁵ The Care Leavers' Association, [Caring for Better Health](#), December 2017

⁵⁶ Department for Children, Schools and Families, [Statutory Guidance on Securing Sufficient Accommodation for Looked After Children](#), 2010

⁵⁷ GLA: London Datastore, [Raising Living Standards](#)

No data has been found that details the extent to which this characteristic correlates with accessing suitable housing and related inclusive neighbourhood needs.

Pregnancy and maternity

No data has been found that details the extent to which this characteristic correlates with accessing suitable housing and related inclusive neighbourhood needs.

7 Appendix B: Engagement summary

7.1 Summary of groups engaged

Already engaged:

The consultation on the document, including the associated EqIA, was widely publicised, with several 'open to all' stakeholder events, as well as some more targeted sessions with LPAs that are also bound by Equalities Act duties. As the consultation report sets out, there is limited information on the demographics, including protected characteristics, of participants, as this was not recorded at events and people chose not to respond to relevant monitoring questions in sufficient numbers in the online survey. However, several additional equalities issues were raised in this process, suggesting that this is nonetheless a helpful process.

Future engagement:

The London Plan team continues to work to broaden its engagement reach, including through the Planning for London Programme. Relevant information will be drawn into the monitoring process and used to update the LPG as necessary.

7.2 Engagement record

The detailed engagement record is to be found in the LPG consultation report (see Appendix 1 of that document).

In summary, of 33 survey respondents, 39 per cent would have been subject to the PSED.

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%
Total	33	100%

While other engagement did take place, the survey was the main source of input around equalities issues given specific questions on the implications of the guidance for different groups with protected characteristics, and the adequacy of the EqIA that accompanied the consultation draft of the guidance.

8 Appendix C: Legal context

8.1 Equality Act 2010

The Equality Act replaced the pre-existing anti-discrimination laws with a single Act. The legislation covers the exercise of public functions, employment and work, goods and services, premises, associations, transport and education.

The Equality Act prohibits victimisation and harassment, and all of the following forms of discrimination: direct; indirect; by association; by perception; or discrimination arising from disability.

The Equality Act recognises [nine protected characteristics](#):

1. Age

A person having a particular age or being within an age group. This includes all ages, including children and young people.

2. Disability

A physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Certain medical conditions are automatically classed as being a disability- for example, cancer, HIV infection, multiple sclerosis.

3. Gender reassignment

A person has the protected characteristic of gender reassignment if they are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

4. Marriage and civil partnership

Marriage is a union between a man and a woman or between a same-sex couple.

Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act).

Marriage and civil partnership are a protected characteristic for the purposes of the duty but only in relation to the first aim of the equality duty as detailed below and only in relation to work.

5. Pregnancy or maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the

non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

6. Race

In the Equality Act, race can mean your colour, or your nationality (including your citizenship). It can also mean your ethnic or national origins, which may not be the same as your current nationality. For example, you may have Chinese national origins and be living in Britain with a British passport.

Race also covers ethnic and racial groups. This means a group of people who all share the same protected characteristic of ethnicity or race.

7. Religion or belief

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief (including ethical veganism) and includes a lack of belief (for example, Atheism).

8. Sex

A man or a woman.

9. Sexual orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Though not a protected group in the Equality Act, the GLA recognises that socio-economic disadvantage is a significant contributor to inequality across London and therefore regards people on low incomes as an additional group against which to assess equality impacts.

8.2 Public Sector Equality Duty aims

The PSED set out at section 149 of the Equality Act requires public bodies, when exercising its functions, to have 'due regard' to the following:

- Aim 1: eliminate discrimination, harassment and victimisation and other conduct prohibited under the Equality Act because of any of the protected characteristics.
- Aim 2: advance equality of opportunity between people who share a protected characteristic and those who do not. This only applies in relation to those who share a relevant protected characteristic for the purposes of this aim.
- Aim 3: foster good relations between people who share a protected characteristic and those who do not. This only applies in relation to those who share a relevant protected characteristic for the purposes of this aim.

The first aim means the giving advance consideration to discrimination issues before making policy decisions. It relates particularly to scrutinising policies, practices or decisions that could result in discrimination or other prohibited conduct.⁵⁸

Having due regard to second aim involves having due regard, in particular, to the need to:

⁵⁸ Equality and Human Rights Commission, [EHRC Technical Guidance](#)

- Aim 2(a): remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Aim 2(b): take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Aim 2(c): encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

Having due regard to the third aim involves having due regard, in particular, to the need to:

- 3(a) tackle prejudice, and
- 3(b) promote understanding.

The three aims of the duty are known as the 'general equality duty'. They must be fulfilled before and at the time of the exercise of a public function and on a continuing basis by the GLA when exercising its functions. Each aim must be considered in turn; for example, the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.

Large-scale Purpose-built Shared Living London Plan Guidance

Consultation summary report

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1 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.

2 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%
Total	33	100%

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.

3 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 LSPBSL 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 LSPBSL 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 LSPBSL 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.

4 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.

5 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.

6 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, 2nd Generation Shared Living Consortium, BPF (compact living working group), SLP UK

Anonymous:

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Consultation Event Attendees

Event Date	Focus	Attendees
25 th Feb 2022	Local Planning Authorities	61
22 nd Feb 2022	Industry	152
18 th 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	The key concerns regarding LSPBSL development from an LPA perspective Testing of draft revisions and implications of these, additional clarifications and nuances discussed

	Waltham Forest	
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