

Dolphin Living comments

Page: [Draft New London Plan](#)

Section: [N/A](#)

As a developer and provider of rental homes for working Londoners Dolphin Living welcomes the Mayor's aspiration to build more homes, especially affordable homes for working Londoners contributing to the city's economic growth and success.

Dolphin Living aims to provide the maximum amount of affordable housing on all our sites. We strongly support the 50% affordable housing target and fast track route and we believe this can aid our objective and generally increase affordable housing delivery in London.

We strongly support the Build to Rent policy and feel this can aid the delivery of our affordable housing product. The proposed tenure mix will rightly simplify planning and delivery of build to rent at scale

Page: [Policy D4 Housing quality and standards](#)

Section: [Table 3.1](#)

Dolphin Living experience high demand for smaller affordable housing unit types that can be provided at lower rents. Well designed affordable and compact units should have a space in the provision of new homes.

A 2 bedroom 2 person unit could offer housing to sharers, couples and single parent families. There is clear demand for this product and the new London plan should meet this demand.

Page: [Policy D4 Housing quality and standards](#)

Section: [3.4.5](#)

Dolphin Living agree that dual aspect units can provide high quality accommodation. However, the provision of dual aspect units can be inefficient, particularly when providing smaller unit types (i.e. 1 person units and smaller 61 sq m 2 bedroom units).

Dolphin Living aim to help as many residents as possible into Build to Rent affordable housing at rents they can afford. By providing smaller single aspect units we can help more people.

Page: [Policy H6 Threshold approach to applications](#)

Section: [4.6.9](#)

The grant levels available under the affordable homes programme do not sufficiently compensate for the required rent levels, especially in high value areas.

Page: [Policy H7 Affordable housing tenure](#)

Section: [4.7.8](#)

We welcome use of the word “generally” when referring to the restriction to household income for intermediate rent. This reflects the fact that for some locations and sizes of homes are not affordable to household incomes of below £60,000. The acknowledgement that a variety of rent levels should be available within Build to Rent is also welcomed. Further we welcome the understanding that Build to Rent developments are best retained under common ownership and so affordable housing within these developments should not be subject to Right to Buy.

Page: [Policy H12 Housing size mix](#)

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Dolphin Living experience highest demand for studio and 1 bedroom homes. Anecdotally we understand from our tenants that this is driven by a wish to “control” their own space and lease at a rent they can afford. They are willing to sacrifice space, especially in a well designed space, for a sole tenancy they can afford.

H12 B explicitly discourages development of majority 1 bedroom flat development. Providing such housing allows us to house residents from which there is greatest demand. Providing smaller unit types allows Dolphin Living to charge lower rents. By providing smaller unit types we are able to compete for land against private sale development, making delivery of affordable housing more viable.

Policy H12 C contradicts policy H12B which notes that LPAs should not be prescriptive about dwelling size mix requirements (in terms of bedroom numbers)

We also challenge the suggestion that 1 bed flats are the 'least flexible unit type'; our smaller flats are very popular and allow us to charge lower rents to our residents.

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Dolphin Living strongly objects to the statement that 1 bedroom units are 'the least flexible unit type'.

We experience the highest demand for this unit type. It allows us to charge lower rents for our affordable housing product.

Page: [Policy H13 Build to Rent](#)

Section: [H13](#)

Dolphin Living strongly support the recognition of Build to Rent and the plans encouragement of institutional investment into the sector.

Understanding the economics of Build to Rent is important and further acceptance of this unique product at all levels of planning policy, specifically at LPA level, is required to drive the vast amount of investment looking to enter into this housing product that can deliver much needed housing supply.

Relaxation of housing standards for this product is required for competition with private for sale housing such as unit and tenure mix (smaller 1 and 2 bedroom units where demand is greatest for BtR), reduction in the amount of dual aspect units (smaller units are hard to design as dual aspect and smaller single aspect units can deliver a greater amount of unit numbers) and increase in the amount of flats per core.

Support -

Dolphin Living support the recognition of purpose built shared living and how it can aid the delivery of housing supply in London.

Discounted rents in this sector can help to provide housing that is affordable to elements of London's population that may not qualify or be able to affordable some affordable housing products (i.e. shared ownership or larger unit type intermediate rental housing).

We experience great demand from single persons on low to middle incomes, some of which could be adequately housed in shared accomodation.