

**Watford Borough Council**

**Co-Living: Standards and Requirements  
Supplementary Planning Document**

**Consultation Statement**

**July 2025**

## **1. Co-Living: Standards and Requirements Supplementary Planning Document (SPD)**

- 1.1 In order to adopt a new Supplementary Planning Document the Town and Country (Local Planning) (England) Regulations 2012 under Regulation 12(a) requires local planning authorities to prepare a statement, setting out:
- i. The persons the local planning authority consulted when preparing the supplementary planning document;
  - ii. A summary of the main issues raised by those persons; and
  - iii. How those issues have been addressed in the supplementary planning document;
- 1.2 In accordance with this part, and Regulation 13 of the named regulations, the persons and organisations consulted as part of the process for preparing the Supplementary Planning Documents are identified in Appendix 2a.
- 1.3 Public Consultation on the Draft Supplementary Planning Documents was open for more than five weeks, from 12<sup>th</sup> February to 20<sup>th</sup> March 2025.
- 1.4 This statement sets out the responses received, the key issues identified and how the council has sought to address these issues.

## **2. Purpose of the Document**

- 2.1. Co-living is a shared housing model that has been gaining significant planning interest in Watford over the past year. This SPD sets out the key standards and requirements for co-living developments to ensure they are well-designed, fit well within the community, and offer a high quality of life for residents.
- 2.2. This guidance is to be used by council officers, members and applicants when developing and making decisions on schemes for co-living.
- 2.3. Once adopted, this SPD will be a material consideration in the determination of planning applications.

### **3. Stakeholders consulted during preparation of the SPD**

- 3.1. The Local Plan consultation database was used as the basis for the consultation and everybody on the database was contacted at the start of the consultation period and then again within 48 hours of the closing date.
- 3.2. This database includes statutory consultees as well as a range of other interested parties, businesses and residents.
- 3.3. Notification of the consultation was also given to attendees at a local Developer Forum which took place in November 2024. See below for further details of this meeting.
- 3.4. Additionally, public notification of the consultation was given on all the Council's social media accounts as described below and so any person who followed these pages would be notified of the consultations taking place.

### **4. How were stakeholders formally consulted?**

- 4.1. Officers presented the proposal to produce supplementary guidance on co-living at the Watford Developer Forum on 12<sup>th</sup> November 2024. This session was attended by a variety of locally active developers and key stakeholders. All attendees at the Forum were consulted on the SPD. Also presenting at this meeting were several co-living developers who outlined their experience of dealing with co-living schemes.
- 4.2. Formal consultation was undertaken in accordance with Watford Council's Statement of Community Involvement (2020).
- 4.3. The consultation consisted of the following:
  - a. *Website*. Details of how to view and respond to the consultation were published on the Council website [here](#).
  - b. *Hard copies*. These were made available to view at the Town Hall and Watford Library throughout the consultation period.

- c. *Email and letter notifications.* The Council sent an electronic newsletter or posted a letter to all those on the Local Plan consultee list<sup>1</sup>.
- d. *Social media resources.* Notification of the consultation period was posted on the Council's Facebook, LinkedIn and Instagram pages. This was done on the day the consultation was launched and at two subsequent times throughout the consultation period.
- e. *Local press.* A press notice was issued in the Watford Observer on Friday 14 February 2025.

4.4. The consultation period ran from Wednesday 12 February 2025 through to 5pm Thursday 20 March 2025.

4.5. The consultation resources are set out in Appendix 1 of this statement.

## **5. Watford Place Shaping Panel**

5.1. The Watford Place Shaping Panel reviewed the draft Co-Living SPD on 21 January 2025 immediately prior to the consultation period. The Panel welcomed the development of detailed guidance to support high quality co-living schemes but encouraged flexibility whilst the co-living model is still evolving.

5.2. Where appropriate, the Panel's suggestions were incorporated into the draft SPD that was consulted on. The main comments arising from this panel discussion are listed below:

- The Panel recommended that the SPD includes a statement that ensures co-living schemes are expected to create a high quality of life to discourage transient communities.

---

<sup>1</sup> Where a bounceback was received, every effort was made to find an alternative contact

- The Panel recommended commissioning a study of the viability of co-living in central Watford. This would not necessarily be to inform the SPD but could strengthen the councils negotiating position.
- The space standards in the Greater London Authority (GLA) guidance seem appropriate for Watford and the SPD should set out clear expectations for private room proportions and layout.
- Applications should include a strong rationale for the location, sizing and range of shared facilities and providing larger, consolidated spaces that link to outdoors should be considered. Kitchen areas in particular should connect to outdoor spaces.
- Schemes should meet the outstanding design requirement in Watford's building height policy including exceeding sustainability expectations.
- The Panel recommended that project teams should provide a statement of intent setting out the rationale for design principles, operation and delivery of the development. This should include a demonstration of how they are exceeding sustainability expectations, how they are achieving outstanding design and significant public benefits where Policy QD6.5 is triggered.
- The quantity of public realm should be proportionate to scheme density. The SPDs guidance on public realm should be strengthened, establishing a clear space requirement that is proportionate to the density of the development.
- Flexibility on bike storage policy should only be granted if public benefit to Watford can be demonstrated. Further research may be beneficial to show whether co-living schemes should be held to the same cycle parking standards as C3 housing.

- The quality of resident amenity space and circulation spaces should be clearly set out, including minimum corridor widths and requirement for natural light and views. Aligning the amenity space requirements with the GLA guidance is supported and reasonable.
- In the Panel's experience, consolidating shared internal amenity spaces into fewer large spaces rather than small areas on each floor works well. The location of these spaces is fundamental to their success and applicants should be asked to demonstrate a minimum journey time from the furthest private room to the communal spaces. It also helps if main kitchen and lounge areas are adjacent to other amenity spaces.
- Applicants should demonstrate that roof areas and other outdoor spaces are useable throughout the year.
- The SPD should make clear that all parts of the development will be run by a single operator.
- Applicants should be required to demonstrate a clear strategy for refuse collection, servicing, deliveries, loading bays and drop offs within the management plan

5.3. All Panel comments were considered and addressed prior to the consultation period and many were incorporated into the consultation draft.

## **6. Consultation Responses**

- 6.1. 8 responses were received to the formal consultation. These were from three statutory consultees and five other interested parties.
- 6.2. The table below sets out responses received. Note that certain responses have been paraphrased to identify the key issues.

| Ref | Respondent type | Organisation name | Para/Section    | Comment  | Council response  |
|-----|-----------------|-------------------|-----------------|--|---|
| 001 | Organisation    | Studio Multi      | Figures 2 and 3 | Please note that for fire safety the kitchen/hob can't be in front of windows so the diagrams will need an adjustment.   | Figures 2 and 3 have been amended to reflect fire safety guidance   |
| 002 | Organisation    | Natural England   | All             | No specific comments   | N/A   |
| 003 | Organisation    | Historic England  | All             | No specific comments   | N/A   |
| 004 | Organisation    | Assael            | Para 2.7        | Does this mean there is no opportunity for a DMR product as part of the co-living scheme or accompanying onsite C3 accommodation? This is a missed opportunity.  | The Council considers that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Text in para 2.7 has however been amended to add clarity. |
|     |                 |                   | Para 3.5        | "It does not provide a secure, long term housing solution." Don't think this is a relevant point. People can choose to live in these developments for years. Length of occupation does not define whether it is C3 or not. Suggest omission. London Plan dictates a 3 month minimum stay period. C3 technically has less restriction on short term use hence not a relevant point. | First bullet point has been removed from the SPD  |



|  |  |  |           |  |  |
|--|--|--|-----------|--|--|
|  |  |  | Para 3.8  | Great if there could be a route to a type of affordable product that could in part make a contribution to affordable housing - through a dmr product. There is a massive demand for this and makes a more diverse and successful community.  | The Council considers that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Tweaks to wording have been made to clarify further. |
|  |  |  | Para 4.19 | Desk space that can be used for solo work or studying. Should be able to double up the dining space for this, and not be in addition   | Pragmatic suggestion. Amendments made to para 4.19 to reflect this   |
|  |  |  | Para 4.58 | "Each private room should include sufficient storage space for luggage." What is the expectation for this? Suggest this is better located in the communal storage noted in the paragraph below. Suggest luggage is omitted from this or at least caveat with 'unless suitable space is provided elsewhere' | Paragraphs 4.58 and 4.59 have been amended   |
|  |  |  | Para 4.65 | Typo 'pace' instead of 'space'   | Corrected  |
|  |  |  | Para 5.4  | Can this mention DMR rooms as an option?   | The Council consider that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Tweaks to wording have been made to clarify further.  |
|  |  |  | Para 6.5  | Feels too prescriptive, better to have a limit across the overall development.   | It does not seem unreasonable for an applicant to provide an indication of how many people may live on the scheme at once. This would allow a  |





|     |              |            |                     |  |  |
|-----|--------------|------------|---------------------|--|--|
|     |              |            |                     |  | consideration of the scheme against the amenity space standards which are per person. However, paragraph wording has been amended to clarify the requirement.  |
|     |              |            | Para 7.6            | Surely this should be a fire statement as appose to being in the management plan   | Agreed- additional para 7.11 and 7.12 added to SPD to clarify  |
|     |              |            | Appendix 1- Table a | Combine desk space and seating/dining space. Don't think the desk space should be in addition to dining table and seat. Want to encourage people to use the co-working space   | Footnote added to clarify  |
| 005 | Organisation | Aroundtown | Para 2.7            | Aroundtown understand that Policy HO3.3 of the Local Plan requires proposal for co-living to make a financial contribution towards affordable housing (Paragraph 2.7). Query whether there is more of an opportunity for schemes to deliver Discounted Market Rent (DMR) as part of the co-living scheme or accompanying onsite C3 accommodation. If this is not the case, then this feels that WBC have missed an opportunity to deliver this type of accommodation.        | The Council consider that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Text in para 2.7 has however been amended to add clarity. |
|     |              |            | Para 3.5            | Paragraph 3.5 states the following "Co-living is not classified as C3 residential development as it does not provide a secure, long term housing solution". Aroundtown have reviewed this description and do not think this point is completely accurate. This is because individuals can live in co-living developments for years i.e. it can provide a secure, long term housing solution. Additionally, the length of occupation does not define the type of housing (Use | First bullet point has been removed from the SPD   |



**WATFORD**  
**BOROUGH**  
**COUNCIL**

|  |  |  |          |  |   |
|--|--|--|----------|--|---|
|  |  |  |          | Class) it is. Therefore suggest this item is removed from the Draft SPD.   |   |
|  |  |  | Para 3.8 | Paragraph 3.8 outlined that co-living “is not considered to be an affordable housing product itself, and as such an additional contribution towards affordable housing will be required in accordance with Policy HO3.6 of the Watford Local Plan. This contribution will usually be provided by way of an off-site financial contribution”. Aroundtown understand this point, however think that there is an opportunity here for co-living schemes to deliver an affordable product i.e. DMR that could in part make a contribution to affordable housing. There is a large demand for this and makes a more diverse and successful community. Highly encourage that WBC consider this suggestion. | The Council consider that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Tweaks to wording have been made to clarify further. |



|  |  |  |           |   |  |
|--|--|--|-----------|---|--|
|  |  |  | Para 4.19 | Paragraph 4.19 outlines the requirements for each private room within a co-living building. Within this there is a requirement for “desk space that can be used for solo work or studying”. Aroundtown advise that this sentence is updated to state that this desk space should also double up as a dining space (bullet point three) and not be an additional requirement. Consequently, Appendix 1: Co-Living Compliance Checklists should be updated to combine the following two private room requirements as currently noted – “Seating/dining space included the adjacent features as a minimum” and “desk space”. Aroundtown want to emphasise that the co-living schemes should encourage residents to use the co-working communal space and therefore do not need a separate dining space and desk space within the private room. | Pragmatic suggestion. Amendments made to para 4.19 to reflect this   |
|  |  |  | Para 4.47 | Paragraph 4.47 states that “It would be helpful if applicants provided an estimated minimum journey time from the furthest private room to a communal amenity space”. Aroundtown believe that this is too much detail to be provided at the planning application stage of the development and should be removed from the Draft SPD.   | Council consider there are other, less onerous ways of assessing this information and so agree with removing requirement |
|  |  |  | Para 4.58 | Aroundtown argue that Paragraph 4.58 should be amended to remove luggage storage being provided in each private room, and instead be included in Paragraph 4.59 where it notes that there is communal storage facilities to keep oversize items that do not fit comfortably in the private rooms.   | Paragraphs 4.58 and 4.59 have been amended   |



|     |              |  |           |   |   |
|-----|--------------|--|-----------|---|---|
|     |              |  | Para 4.65 | Aroundtown want to flag that there is a typo in Paragraph 4.65 – the sentence currently states “pace” but should say “space”.   | Corrected   |
|     |              |  | Para 5.4  | Paragraph 5.4 states the following “Any proposal to provide on-site affordable housing on a co-living development will be considered on a case by case basis”. Aroundtown advise that this should be updated to include DMR on-site as part of the affordable offer.  | The Council consider that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. Tweaks to wording have been made to clarify further.   |
|     |              |  | Para 6.5  | Paragraph 6.5 states that “Other than in specifically designed two person rooms, tenancies should be for single occupancy and the applicant should provide a maximum number of residents expected on the scheme as part of the application”. This requirement feels too prescriptive for a co-living scheme. Aroundtown advise that there should be a limit across the overall development. | It does not seem unreasonable for an applicant to provide an indication of how many people may live on the scheme at once. This would allow a consideration of the scheme against the amenity space standards which are per person. However, paragraph wording has been amended to clarify the requirement. |
|     |              |  | Para 7.6  | Paragraph 7.6 states that “The Management Plan should set out clearly how the development, including the private rooms, has complied with the latest fire safety regulations”. Aroundtown question the wording of this, and advise that it is updated to refer to a Fire Statement rather than a Management Plan.   | Agreed- additional para 7.11 and 7.12 added to SPD to clarify   |
| 006 | Organisation | Watford Community Housing Trust (WCHT) | All       | WCHT welcome the development of the Co-Living SPD but make no comments.   | Support welcome   |



**WATFORD  
BOROUGH  
COUNCIL**

|     |              |                   |                    |   |  |
|-----|--------------|-------------------|--------------------|---|--|
| 007 | Organisation | National Highways | All                | We are content that the draft SPD complies with Local Plan policies and will not alter any conclusions from the transport evidence as part of the Local Plan. Therefore have no further comments on the SPD.  | N/A  |
| 008 | Organisation | Halcyon           | Affordable Housing | Share Assael view with regards to the affordable housing contribution and whether the PIL route was a missed opportunity as opposed to incorporating DMR. The DMR product we have in our two London schemes is really successful and ensures that we're able to pitch the offer to a very wide range of affordability. Think in Watford a co-living DMR product could open up co-living housing opportunities to those really early in their careers or in traditionally lower earning sectors including key workers. Appreciate there is a wider remit to deliver affordable housing, however Halcyon found there are huge numbers of individuals in society generally who are priced out of market housing and not eligible for social housing. Halcyon will be campaigning for the next iteration of The London Plan to reflect this where there is already a policy for affordable student accommodation. | The Council consider that sufficient flexibility exists in the Affordable Housing SPD and in the Co-living SPD for the Council to consider on-site affordable housing proposals on a case by case basis. |

## **7. Proposed changes to the SPD**

- 7.1 As a result of the above responses being received, the following changes are proposed to the SPD.
- 7.2 In response to several comments, the Council has provided additional clarification regarding on-site affordable housing contributions from co-living schemes. Whilst not proposing to be as explicit in its support for Discounted Market Rent as has been suggested in responses, the Council consider that the SPD now offers sufficient flexibility for on-site affordable housing contributions to be put forward for consideration by the Council on a case by case basis. This has also been reflected in the parallel Affordable Housing SPD.
- 7.3 Figures 2 and 3 will be amended to ensure that they reflect the latest fire regulations in terms of layout and positioning of the kitchen.
- 7.4 Reference to co-living not providing a long term, secure housing solution will be removed.
- 7.5 Add footnote to paragraph 4.19 and Appendix 1, Table A that clarifies that desk space and dining space can be combined.
- 7.6 Clarity added to paragraph 4.58 to ensure approach to luggage storage is reasonable and practical.
- 7.7 Clarify the requirement for applicants to set out a maximum number of residents on a co-living scheme so that this becomes a requirement only to set out the number of double occupancy rooms.
- 7.8 Amend the requirements of the Management Strategy to separate the compliance with the latest fire regulations into a Fire Statement rather than in the Management Strategy.

## **Appendix 1 – Consultation documents/material**

### **Appendix 1a (Letter sent to those on consultation database without an email address)**

Dear Sir or Madam,

#### **RE: Watford Borough Council consultation on two Supplementary Planning Documents**

Watford Borough Council has published two Supplementary Planning Documents (SPDs) for consultation until 5pm on 20<sup>th</sup> March 2025.

##### Affordable Housing: Developer Contributions SPD

This SPD focuses on the provision of developer contributions towards affordable housing. Specifically, it outlines a revised approach to calculating off-site affordable housing contributions through commuted sums and a methodology for undertaking a late stage review to determine whether any additional affordable housing contributions are possible once a development is substantially completed.

##### Co-living: Standards and Requirements SPD

Co-living is a form of shared communal living for which interest in Watford has increased over the past year. This SPD therefore focuses specifically on co-living development and will set out a range of quantitative and qualitative standards and requirements that a co-living scheme would be expected to meet. The aim of the SPD is to ensure that co-living schemes are well designed, well integrated into their surrounding community and that they provide a high quality of life for residents.

#### **How and when to respond?**

The deadline for comments on both SPDs is **5pm on 20 March 2025**.

Responses to both SPDs should preferably be provided by email to [strategy@watford.gov.uk](mailto:strategy@watford.gov.uk)

Alternatively, responses can be made in writing to Planning Policy Team, Town Hall, Watford, WD17 3EX.

#### **Where to view the documents?**

The easiest way of viewing the SPDs is via the planning policy pages on the Councils website here- [www.watford.gov.uk/planning-guidance-1/community-planning](http://www.watford.gov.uk/planning-guidance-1/community-planning).

Paper copies of the SPDs are available to view at the Town Hall and Watford Library during normal opening times.

You are receiving this letter because you are listed on the Councils Local Plan consultation database. If you no longer wish to be on the database, or you would like to provide an email contact for future correspondence then please let us know.

If you have any queries, please do not hesitate to contact the Planning Policy team by email ([strategy@watford.gov.uk](mailto:strategy@watford.gov.uk)) or telephone (01923 278617).

Yours sincerely,

**Ellen Higginson**

**Place Shaping Lead**


Watford Borough Council

Town Hall, Watford, Hertfordshire WD17 3EX

[watford.gov.uk](http://watford.gov.uk)




Appendix 1b (Email that was sent on 12<sup>th</sup> February 2025)


 The linked image cannot be displayed. The file may have been moved, renamed, or deleted. Verify that the link points to the correct file and location.

[View this email in your browser](#)

## Have your say on two Supplementary Planning Documents

NEWS FROM

 **WATFORD  
BOROUGH  
COUNCIL**

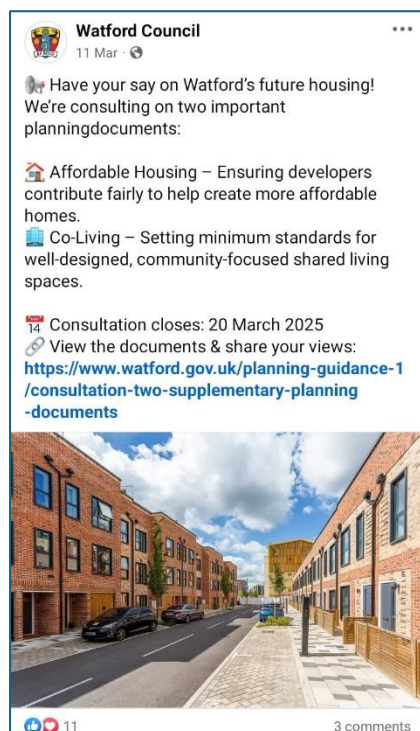


**WATFORD  
BOROUGH COUNCIL**

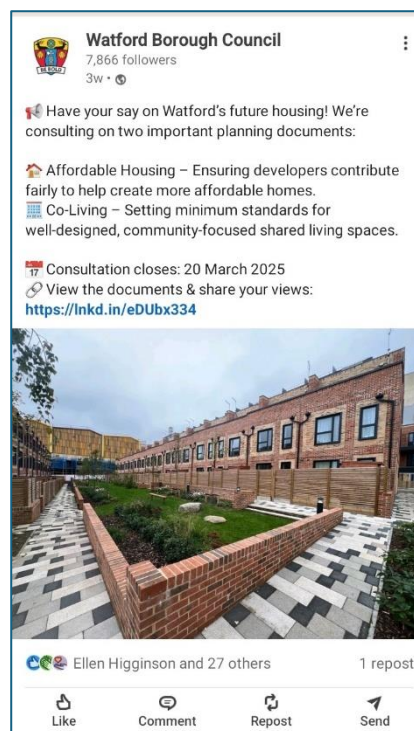
The council is now consulting on two Supplementary Planning Documents (SPDs) which build on policies in the adopted Local Plan. We welcome comments on either document from any interested parties. These consultations are running in parallel and the deadline for comments is **20 March 2025**.

## Appendix 1c (Social Media posts)

### Facebook



### LinkedIn



### Instagram





**WATFORD  
BOROUGH  
COUNCIL**

Appendix 1d (Press notice that was in the Watford Observer on Friday 14<sup>th</sup> February)

## **WATFORD BOROUGH COUNCIL**

### **WATFORD PLANNING DOCUMENT CONSULTATION**

Watford Borough Council is consulting on two new supplementary planning documents.

#### **Affordable Housing: Developer Contributions Supplementary Planning Document (SPD)**

This SPD focuses on the provision of developer contributions towards affordable housing. Specifically, it sets out a revised approach to calculating off-site affordable housing contributions through commuted sums and a methodology for undertaking a late-stage review to determine whether any additional affordable housing contributions are possible once a development is substantially completed.

#### **Co-living: Standards and Requirements Supplementary Planning Document (SPD)**

Co-living is a form of shared communal living for which interest in Watford has increased over the past year. This SPD focuses specifically on co-living development and will set out a range of quantitative and qualitative standards and requirements that a co-living scheme would be expected to meet. The aim of the SPD is to ensure that co-living schemes are well designed, well integrated into their surrounding community and that they provide a high quality of life for residents.

The consultation runs until **5pm on Thursday 20th March 2025**.

To find out more, read the documents and to provide comments please visit: [www.watford.gov.uk/planning-guidance-1/community-planning](http://www.watford.gov.uk/planning-guidance-1/community-planning)

Responses should be sent by the deadline to [strategy@watford.gov.uk](mailto:strategy@watford.gov.uk) or alternatively sent to Planning Policy Team, Town Hall, Watford, WD17 3EX.

Paper copies are available for inspection at Watford Town Hall Customer Service Centre and Watford Central Library during normal opening hours.

**Dated: 14th February 2025      [www.watford.gov.uk](http://www.watford.gov.uk)**

## **Appendix 2 – List of Consultees**

### **Appendix 2a (Specific Consultation Bodies)**

- Adjoining (and nearby) Local Planning Authorities (Dacorum Borough Council, Hertsmere Borough Council, St Albans City & District Council and Three Rivers District Council)
- The Coal Authority
- Electronic communication companies who own or control apparatus in the Borough
- Environment Agency
- Hertfordshire County Council
- Hertfordshire Valleys Clinical Commissioning Group
- Highways Agency
- Historic England
- Homes and Communities Agency
- Marine Management Organisation
- Natural England
- Network Rail
- Town and Parish Councils adjoining the Borough
- Utilities and service providers

### **Appendix 2b (Duty to Co-Operate)**

- Civil Aviation Authority
- Environment Agency
- Hertfordshire Futures
- Historic England

- Homes and Communities Agency
- Highways Authority
- Integrated Transport Authorities
- Marine Management Organisation
- Mayor of London
- Natural England
- Neighbouring local authorities and county councils
- Office of Rail Regulation
- Primary Care Trusts (Herts Valley Clinical Commissioning Group)
- Thames Water
- Transport for London