

Respondent No. 1195 The Retirement Housing Consortium

Draft London Plan Housing Supply & Targets

M19. Are the overall 10 year housing target for London and the target for the individual Boroughs and Corporations set out in Policy H1 A and in Table 4.1 justified and deliverable? In particular:

No.

The Consortium supports the position of the HBF that the housing land supply assumptions used in the DLP are flawed. The targets set out for the individual Boroughs & Corporations set out in Table 4.1 and Policy H1 A are not realistically deliverable or justified and that the DLP should be deemed unsound on that basis. We support the HBF submission on this matter.

Little consideration appears to have been given to whether the annualised target for each of the London Borough's for specialist older persons' housing in *Table 4.4: Annual Borough Benchmarks for Specialist Older Persons' Housing (C3) 2017-2029* is deliverable. There would need to be an increase in output in this sector by **circa 600%** per annum to meet demand.

Table 3.38 of the most recent Annual Monitoring Report identifies that there is a shortfall of 3,276 units against the annualised target in Annex 5 of the adopted London Plan. 15 of the London Boroughs provided no specialist housing for older people at all. In one instance, the Royal Borough of Greenwich, one member of consortium was responsible for all their delivery of specialist housing over that period. It is abundantly clear that the Mayor and the London Boroughs are reliant on private developers, such as the members of the Consortium, to markedly increase their delivery to meet the targets of Table 4.4 of the DLP.

In light of the above we consider that it is illogical for the Mayor to stipulate a requirement on the London Boroughs to markedly increase the delivery of specialist older persons' accommodation while simultaneously imposing a policy framework that hinders these forms of development being brought forward. The overly prescriptive design and development contributions policies required by the DLP policies have been prepared with little or no consideration of feasibility, suitability or the impact on viability for forms of accommodation (further detail to be provided in Housing Quality & Viability Hearing Statements). The DLP cannot be considered deliverable under the 'tests of soundness' in Paragraph 182 of the NPPF (2012) as a consequence.

a) Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment (SHLAA) reasonable and realistic?

The Consortium shares the view of the HBF that there is a high degree of risk associated with basing the DLP housing targets on SHLAA assumptions.

We therefore support the response of the HBF in this regard.

b) Have the environmental and social implications of the proposed increase in housing targets been fully and properly assessed?

The Consortium supports the view of the HBF in this regard.

c) Policy H1 B 2) a)-f) identifies various sources of capacity. Will these be sufficient to meet the ten years targets and what proportion of housing is expected to be delivered by means of the different types? How much is expected to be delivered on existing industrial land in the context of Policies E4-E7?

The Consortium supports the view of the HBF in this regard.

d) Will the focus on existing built up areas rather than urban extensions using GB/MOL provide sufficient variety of house types and tenure?

The Consortium supports the principle of the optimising the use of previously developed land in sustainable locations within and on the edge of town centres, including smaller sites. Such sites are eminently suitable for specialist older persons' accommodation and the best use of such sites is a defining characteristic of this form of development.

It is also well recognised that the delivery of specialist older persons' housing frees up under occupied housing stock. In accordance with the Government's bedroom standard in which people have at least two unused bedrooms, 57% of people aged over 55 were considered to be under occupying. Research by the Intergenerational Foundation in 2011 entitled '*Hoarding of Housing: The intergenerational crisis in the housing market*' identified that there were 18 million surplus bedrooms in 2009/2010, 9 million of which were under occupied by those aged 60 and over. Shelter calculated in their research entitled '*A better fit? Creating Housing choices for an ageing population*' (2012) that if

20% of older households currently under occupying were to downsize, around 840,000 family homes would be released, including 760,000 that were owner occupied in tenure.

Increasing the delivery of specialist older persons' housing in Greater London would increase the diversity of available housing stock, not only by meeting the housing needs of older Londoners but also families and first time buyers through the release of under occupied housing stock.

It is therefore both counterintuitive and counterproductive for the Mayor to impose an overarching planning policy framework across Greater London that will inhibit the delivery of this form of development.

e) Is the emphasis on development in outer London consistent with the intention in Policy GG2 that seeks to proactively explore the potential to intensify the use of land on well-connected sites?

The Consortium supports the view of the HBF in this regard.

f) Does the Plan adequately consider the cumulative impacts of other policies on the deliverability and viability of housing?

No.

The Mayor's viability evidence is based on the false understanding that the viability of delivering specialist older persons' housing is no different to conventional forms of housing and the evidence base is lacking as a consequence.

The Consortium has consistently and frequently advised the Mayor that the viability evidence underpinning the DLP is insufficiently robust on this basis.

The Consortium is strongly of the view that the DLP cannot be considered justified under the 'tests of soundness' in Paragraph 182 of the NPPF (2012).

It is our intention to provide further information on this matter in our Statement for the Viability Hearing Session.

g) What is going to bring about the step change in delivery implied in the Plan compared to the current one? What are the tools at the disposal of Boroughs in 1.4.6? Is it realistic to expect this to occur from 2019 or should there be a stepped or transitional arrangement?

The DLP requires two step changes in delivery; one in the overall level of housing delivery and the other in the delivery of older persons' housing.

The Consortium shares the view of the HBF that the step change in overall housing delivery is expected to arise as a result of the increased delivery of small sites, as per the targets in Table 4.2. In our consultation responses to the DLP, the consortium supported the presumption in favour of small sites in sub-clause D) of Policy H2 however we are concerned with the caveats detailed in sub-clause F) of the same Policy.

Notwithstanding the above we share the concerns of the HBF on the reliance of small sites to provide 24,573 completions per year from 2019. We therefore support the response of the HBF in this regard.

In relation to the step change in the delivery of older persons' housing, Policy H15 advises that there is a need to deliver 4,000 units per annum of older persons' accommodation to meet the total potential demand for this form of accommodation (paragraph 4.15.4 of the DLP).

Put into context, Table 3.38 of the most recent Annual Monitoring Report (AMR) advises that only 624 units of specialist older persons' accommodation were approved in 2016/17. There is therefore a need to be an increase in output in this sector by circa 600% per annum to meet demand.

Conversely however the DLP creates a more restrictive planning policy framework and takes little to no consideration of the specialist features, design requirements, and in particular the viability of these forms of development.

As a result, it is our view that there is no prospect of an increase in delivery of specialist older persons' accommodation, indeed we feel that the delivery will decrease as a result of the DLP. As the DLP is undeliverable in this regard, it is considered unsound on that basis.

h) Should Table 4.1 include targets for different types and tenures of housing?

The provision of annualised targets for different types and tenures of housing is a key matter and it is imperative that this information is presented clearly within the DLP.

Table 4.1: 10 year targets for net housing completions (2019/2020 – 2028/29) provides an annualised average target for housing delivery which makes the expectation for each London Borough clear.

This table is useful in its own right provided that a finer level of detail for different housing types and tenures is provided elsewhere in the document.

In the case of specialist older persons' housing, annual benchmarks for the delivery of specialist older persons' housing (C3) for each of the London Boroughs are provided in

Table 4.4: Annual Borough Benchmarks for Specialist Older Persons' Housing (C3) 2017-2029.

We note however that the DLP removes *Annex 5: Specialist Housing for Older People* from the adopted London Plan. Table A5.1 of the Annex provided indicative annualised targets for specialist older persons' housing for each London Borough but crucially broke this figure down by tenure.

Table 4.4 does not include a tenure breakdown unlike Annex 5 of current LP. LPA's are generally unaware of tenure requirements for retirement and in our experience there is a danger they will continue to apply normal open market tenure requirements as is currently normal practice. We have provided table below which compares the annualised housing targets in both Table A5.1 of the Adopted London Plan and Table 4.4 of the DLP.

London Boroughs	Annual indicative requirement benchmarks				
	Table A5.1 of Annex 5 of the adopted London Plan				Table 4.4. of DLP
	Total	Private Sale	Intermediate Sale	Affordable rent	Total
Barking and Dagenham	70	50	15	5	70
Barnet	225	155	60	10	275
Bexley	135	90	45	0	145
Brent	175	105	35	35	230
Bromley	205	140	65	0	210
Camden	100	65	20	15	105
City of London	0	0	0	0	10
Croydon	195	140	55	0	225
Ealing	180	135	40	5	200
Enfield	170	120	50	0	195
Greenwich	85	65	20	0	105
Hackney	55	25	10	20	40
Hammersmith & Fulham	60	45	15	0	70
Haringey	100	80	20	0	110
Harrow	150	110	40	0	165
Havering	185	135	50	0	185
Hillingdon	155	115	40	0	180
Hounslow	145	95	30	20	135
Islington	90	30	10	50	60
Kensington & Chelsea	100	60	20	20	85
Kingston upon Thames	95	70	25	0	105
Lambeth	75	55	15	5	70
Lewisham	115	65	25	25	100
Merton	110	80	30	0	105
Newham	75	55	15	5	85
Redbridge	120	75	45	0	155
Richmond upon Thames	135	105	30	0	155
Southwark	115	45	15	55	65
Sutton	105	79	35	0	100
Tower Hamlets	70	25	10	35	45
Waltham Forest	90	65	25	0	110
Wandsworth	105	80	25	0	120
Westminster	110	70	20	20	100

London Total	3900	2620	955	325	4,115
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The omission of Annex 5 of the DLP is a retrograde step as the quantum of provision needs to be split by type and tenure. The Consortium made the point repeatedly in our representations to the DLP that the removal of Annex 5 was both ill-advised and unhelpful in identifying and addressing needs.

It is our view that the current London Plan Annex 5 approach should be duly retained and repeated either in Table 4.4 or as a revised annex.

The rationale for removing tenure breakdown for older persons' housing in the DLP has not been justified. At face value however we consider that the rationale behind removing the tenure split undermined the MoL's approach for seeking affordable housing contributions from these forms of housing.

In Table A5.1 the tenure split clearly identifies that in a significant number of the London Boroughs the need is predominantly weighted towards the delivery of units for private sale. A tenure split in accordance with Table A5.1 would be private sale (67%), intermediate sale (24%) for affordable housing (8%). The affordable housing requirement of 50% as per Policy H7 of the DLP does not reflect the tenure needs of older Londoners.

By removing tenure targets for older persons' housing from the DLP, the MoL seeks to provide ambiguity on a matter that is clear in the current London Plan. We can only assume that the rationale behind this is that it is helpful in asserting an ideologically based affordable housing requirement that is at odds with the tenure needs of older Londoners.

j) Should the target be for longer than 10 years given that the plan period runs to 2041?

No. The Consortium share the view of the HBF that lengthening the Plan period will not aid the deliverability of the Mayor's Strategy. We therefore support the response of the HBF in this regard.

j) How and where is the shortfall between the identified need of 66,000 additional homes a year and the total annualised average target of 64,935 to be made up? Will LPAs outside London in the wider south east be expected to deal with this on an ad hoc basis and is this realistic?

The Consortium shares the view of the HBF that there is no effective strategy for meeting unmet need and has not attempted to find a solution in this respect. The DLP cannot be considered to be either positively prepared or effective and is unsound as a consequence.

We therefore support the response of the HBF in this regard.

k) Does paragraph 4.1.8A adequately explain how Boroughs are to calculate a target beyond 2028/29?

No. The Consortium share the view of the HBF that the approach proposed in paragraph 4.1.8A is both ineffective and contrary to national policy. The approach is considered to be unsound as a consequence.

We therefore support the response of the HBF in this regard.

l) What will be the implications for London Boroughs if the Plan targets are adopted which increase the requirement in recent development plans?

The Consortium shares the view of the HBF that a new Local Plan will need to be prepared by each of the London Boroughs.

Plan preparation is a time consuming and costly process and many of the London Boroughs have yet to update their Local Plans against the targets of the 2016 London Plan. This further decreases the likelihood of meeting the DLP's housing targets.

The London Boroughs have made little progress in, and in many cases little attempt to, boost the delivery of specialist older persons' housing. Table 3.38 most recent Annual Monitoring Report identifies that there is a shortfall of 3,276 units against the annualised target in Annex 5 of the adopted London Plan.

Table 4.4 of the DLP further increases the annual benchmark for the delivery of these forms of accommodation by an addition 215 units per annum. Despite this however the DLP imposes a prescriptive development management and developer contribution regime on the London Borough's that gives little consideration to these forms of housing.

In summary the DLP has increased the London Borough's annualised targets for the delivery of specialist forms of older persons' accommodation above levels which they are already falling substantially short of. In tandem with the above, the DLP also significantly limits the scope of the London Borough's to prepare a local planning policy framework that will meaningfully increase delivery.