

LBRuT all responses received on the consultation of the draft Affordable Housing Supplementary Planning Document (SPD) (17 June to 1 August 2022)



Comments were received from 7 respondents. Please note, the responses below are exactly as received from the respondents and have not been edited by the Council. They are not alphabetically ordered or in any other order of priority.

Respondent reference no	Name/Organisation
1.	Mark Knibbs, Avison Young on behalf of St George Plc and Marks and Spencer Group Plc
2.	Caroline Brand
3.	Lucinda Turner, Greater London Authority
4.	Nick Dexter, Heathfield Labour Party
5.	Kelly-Marie Tuthill
6.	Wendy Micklewright
7.	Luke Burroughs, Transport for London (TfL) Commercial Development

No.	Name/Organisation	Response
1	Mark Knibbs, Avison Young on behalf of St George Plc and Marks and Spencer Group Plc	<p>These representations have been prepared by Avison Young on behalf of St George Plc ('SG') and Marks and Spencer Group Plc ('M&S'), in relation to the London Borough of Richmond upon Thames (LBRuT) Draft Affordable Housing SPD consultation.</p> <p>As you are aware, SG and M&S are currently in discussions with LBRuT Officers regarding the redevelopment of Kew Retail Park. In addition to this AY, on behalf of SG and M&S made representations in relation to the Regulation 18 draft Local Plan in January 2022.</p> <p>1. Overarching Comment</p>

		<p>In accordance with Annex 2 of the NPPF, the purpose of Supplementary Planning Documents is to add detail to the policies in the development plan. This is in the context that SPDs cannot introduce policy.</p> <p>The draft SPD clarifies at para 1.3 that its purpose is to supplement Policy LP36 of the adopted Local Plan (2018). The Local Plan was adopted prior to the publication of the current version of the NPPF (2021) and the London Plan (2021). The new London Plan introduced a radically different policy approach to affordable housing (Policies H4 and H5), specifically the introduction of the threshold approach to applications and the Fast Track Route. It also introduced revised affordable housing tenure split requirements (Policy H6).</p> <p>Adopted Local Plan Policy LP36 is not consistent with the London Plan on these matters. This inconsistency creates uncertainty and confusion for developers and the public, and in our view one of the key purposes of the SPD should be to identify the key inconsistencies and to provide clear guidance on how these are to be managed for the purposes of decision making.</p> <p>Key to managing such conflicts is s.38(5) of the Planning and Compulsory Purchase Act (2004), which requires that where a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved, or published. Accordingly, as a matter of procedural principle, any conflicts between Local Plan Policy LP36 and London Plan Policies H4-H6 should be resolved in favour of the London Plan (2021).</p> <p>We recommend that the draft SPD is reviewed and updated throughout to account for the above.</p> <p>2. Detailed Comments</p> <p>In the context of the above overarching comment, we set out below more specific recommended changes to the draft SPD, including our reasoning.</p> <p>(i) <u>Definition of Affordable Housing</u></p> <p>The definition of Affordable Housing in the glossary of the draft SPD is not consistent with paragraph 2.4 of the draft SPD, the NPPF or the London Plan. It should therefore be amended to be consistent, otherwise it will create uncertainty in decision making and confusion for applicants and the public. We recommend the following amendments:</p> <p><i>Affordable Housing</i></p>
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~~Social rented, affordable rented and intermediate housing, provided to eligible households Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) and complies with one or more of the following definitions as set out within the NPPF: Affordable housing for rent; Discounted market sale housing; other affordable routes to home ownership. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. The NPPF sets out further the definition of affordable housing.~~

We recommend that the document is reviewed throughout to ensure consistency.

(ii) Threshold/Fast Track Approach

The draft SPD should provide clearer, more explicit guidance on how the Threshold approach will be applied by the Council in accordance with the London Plan. The draft SPD should clarify that the Council accepts the principle of the Fast Track Route, the relevant threshold level, the relevant affordable tenure split and the application of late/mid stage viability reviews.

This means that for the purpose of decision making, planning applications for major development proposals that provide 35% affordable housing (50% on public sector and industrial land) and satisfy the other criteria of Part C of Policy H5 of the London Plan (2021) should be allowed to follow the Fast Track Route. In this scenario, there should be no requirement to provide a viability assessment at the application stage nor should mid or late stage viability reviews be imposed.

We therefore propose the following changes to paragraph 4.5 of the draft SPD.

*The London Plan and the Mayor of London's Affordable Housing and Viability SPG set out a threshold approach, which means that schemes providing 35% affordable housing with a tenure compliant mix do not need to provide viability information and are not subject to a late stage review (refer to paragraph 10.3). This is not addressed in the current Local Plan and the new Local Plan will set out the local circumstances to evidence a policy position. Until weight can be given to the emerging policy, **applications for development proposals that provide the threshold level of 35% affordable housing (50% on public sector land and/or industrial land) and satisfy the criteria of London Plan Policy H5 (Part C) will follow the Fast Track Route where***

applications are not required to provide a viability assessment at the application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted. Fast Track applications will not be required to undertake mid or late stage viability reviews. ~~threshold approach will apply on referable schemes; on schemes which do not meet the referable criteria for call-in by the Mayor, the Council will continue to seek to influence site-specific viability discussions and to establish, through discussion with housing and planning officers, whether proposed tenure and affordability will reflect local needs, and if there is a funding opportunity to enhance delivery~~

(iii) Preferred Affordable Housing Tenures

We recommend that paras 2.4 and 2.7 of the draft SPD are updated to be consistent with the Mayor's preferred affordable housing tenures as set out at Policy H6 and paras 4.6.3-4.6.7 of the London Plan. We recommend deleting reference to Starter Homes as this product has effectively been abandoned.

(iv) Affordable Tenure Mix

The tenure mix as set out at paragraph 3.14 of the draft SPD is not consistent with Policy H6 of the London Plan. We therefore suggest this is amended to reflect the 30:30:40 split as required by the London Plan.

*The tenure mix set out in Policy LP36 for affordable housing provided in the borough is 40% housing for affordable rent and 10% intermediate housing. **This is not consistent with London Plan Policy H6 which requires a split of affordable products to comprise a minimum 30% lowcost rented homes (as either London Affordable Rent or Social Rent), a minimum 30% intermediate products which meet the definition of genuinely affordable housing (including London Living Rent and London Shared Ownership) and the remaining 40% to be determined by the borough as low cost rented or intermediate products. Accordingly, the Council's updated requirement is that 70% of affordable homes should be London Affordable Rent or Social Rent and 30% should be intermediate products.** ~~The 40% housing for affordable rent and 10% intermediate housing. The Council This differs from the current London Plan in requiring more rented accommodation, however, it was found to be a sound approach at the Council's Local Plan Examination as it accords with the Council's priorities and evidence base, and the Mayor's~~*

~~Housing SPG (2016) explicitly allows for such local targets.~~

(v) Affordability Criteria for Intermediate Housing and the Council's 'Position' on London Affordable Rent

Paragraph 2.7 refers to the Council's Tenancy Strategy (no date) and the Intermediate Housing Policy Statement (2017) as setting out the Council's position regarding affordable rent levels and affordability criteria for intermediate housing. These are not formal planning documents, and their content is not fully consistent with the adopted London Plan, which as set out above was published more recently.

The London Plan sets out in up to date development plan policy terms how these matters should be managed at Policy H6, and the supporting text at paras 4.6.1-4.6.12. Paragraph 2.7 of the draft SPD should be updated to replace references to the Tenancy Strategy and the Intermediate Housing Policy Statement with the London Plan

Suggested amendments to paragraph 2.7 of the draft SPD are set out below:

Affordable housing includes social rent, London Affordable Rent and intermediate housing (Shared ownership or London Living Rent or Discounted Market Rent)). The Council's position on London Affordable Rent these tenures is as set out in London Plan Policy H6. is set out in the Tenancy Strategy. The Council's position on intermediate housing is set out in the Intermediate Housing Policy Statement (2017). The Policy Statement sets out the priority and income eligibility criteria for intermediate homes within the borough. There is an annual report to the Council's Adult Social Services, Health and Housing Committee, which sets out updates to the Council's affordable housing guidance on affordable rent levels and affordability criteria for intermediate housing.

Furthermore, the requirement (at para. 4.2) that two thirds of intermediate applicants' household incomes should be under £50k is not consistent with the London Plan nor otherwise justified by planning policy (the Council's Intermediate Housing Policy Statement is not policy). Paragraph 4.2 should therefore be amended to reference London Plan Policy H6 para 4.6.8. In addition to this, the income and eligibility restrictions as set out at para 4.2 of the draft SPD should be consistent with those set out within the London Plan.

We therefore suggest the following amendments are made to paragraph 4.2 of the draft SPD:

*Housing provided on a shared ownership basis must be affordable to households on a low to moderate income. ~~The current Intermediate Housing Policy Statement (IHPS)~~ **London Plan Policy H6 supporting paragraph 4.6.8** sets out the Council's position with regard to the prioritisation of applicants for intermediate housing and the income eligibility range. In response to the rising cost of intermediate housing, an upper cap, in line with the GLA cap of £90,000 household income, will be permitted. Regard will be had to the periodic review of figures set out by the GLA. ~~The Council would however expect that two thirds of scheme applicants have incomes under £50,000 and these households should be prioritised. These caps are not static and are subject to change; the Intermediate Housing Policy Statement is reviewed periodically and there is an annual report to the Council's Adult Social Services, Health and Housing Committee, which sets out updates to the Council's affordable housing guidance on affordable rent levels and affordability criteria for intermediate housing.~~ The Council requests that there is early engagement from Registered Providers and developers to make sure the right affordable housing is provided at the right level. ~~The Council's Intermediate Housing Policy Statement also sets out guidance on the marketing of shared ownership homes by Registered Providers to help prioritise sale to local people and monitor the take up of units by local residents. In relation to London Living Rent, which is another intermediate housing product, the Council expects that these homes will be subject to the same criteria as Shared Ownership or any other intermediate policy save for the income cap is set at £60,000 and the rents can be no more than those published annually by the GLA by ward and number of bedrooms within the property.~~*

(vi) Approval of a Registered Provider

The requirement for developers to obtain Council's approval of a Registered Provider is more onerous than London Plan requirements as set out under London Plan Policy H5 supporting paragraph 4.5.11. Paragraph 3.10 of the draft SPD should therefore be amended to be consistent with the London Plan as the most up to date part of the development plan as set out below:

*In addition, the Council will expect all developers to **engage with** ~~identify and get the Council's approval of a Registered Provider to support the delivery of affordable housing on site. In this way negotiations on viability will allow the resources available to the Registered Provider to be considered early in the planning process. Viability appraisals will need to demonstrate how~~*

affordable housing is being maximised with Registered Providers, optimising their use of all resources including borrowing and grant as and when it is available. The values used for affordable housing within the financial viability assessment should be informed by these discussions.

(vii) Unit of Measurement (for Calculating Affordable Housing %)

Affordable housing should be calculated on a habitable rooms basis as required by London Plan Policy H5 supporting paragraph 4.5.3, therefore we recommend that paragraph 3.13 is amended as suggested below:

*Generally, ~~t~~The percentage of affordable housing is calculated on the number of **units habitable rooms**. Paragraph 9.3.6 of the Local Plan (2018) states that where affordable housing involves dwellings with larger numbers of habitable rooms per dwelling, or different sizes of habitable rooms with different tenures, it may be more appropriate for the calculation of the affordable housing proportion to be in terms of habitable rooms or floorspace. The affordable housing provision (on-site or off-site) or any financial contribution should be calculated in relation to gross rather than net development, i.e. it should be based on the total number of **units habitable rooms** proposed in the final development. Calculations, including determining the level of financial contributions in lieu of affordable housing units, should always relate to the specific scheme which is the subject of the planning application and not a hypothetical alternative scheme.*

(viii) Car Parking

Paragraph 7.5 needs to be amended so that is made clear that there is no obligation by a developer to provide car parking spaces (excluding wheelchair spaces) to a Registered Provider free of charge (on the basis that there is not up to date planning policy requirement for this), therefore we suggest the following amendments:

*Where parking is provided, any differentiation in the proportion of spaces allocated to affordable homes compared with other housing would need to be accompanied by evidence. **As with the market sale homes, owners of affordable homes should be able to purchase parking spaces from the developer.** The Council will endeavour to ensure that for all wheelchair accessible affordable housing there will be dedicated parking within the scheme that provides inclusive access for future residents. The Council may seek the removal of resident permits in*

		<p><i>Controlled Parking Zones (CPZs) when they are oversubscribed and membership of car clubs for any new units; see Local Plan Policy LP 45 for more details on policy requirements related to parking.</i></p> <p>It is our view that the changes as recommended above are necessary to ensure that the draft SPD is consistent with the development plan. We therefore respectfully ask that the necessary changes are made in line with our comments.</p> <p>We trust that this representation is clear and can be registered and consider accordingly by the Borough. Please do not hesitate to contact me should you require any additional details or wish to discuss further.</p>
2	Caroline Brand	<p>Why does not the Council consider selling land to actual people who want to live in the home their build. They could have a clause they aren't for private rent (a bit like South Lodge in Whitton)</p> <p>I know we don't have the luxury of spare land in the Borough but other Councils (like site below) sell to individuals in order to maintain Community.</p> <p>https://www.gravenhill.co.uk/</p>
3	Lucinda Turner, Greater London Authority	<p>Thank you for consulting the Mayor of London on the draft Revised Affordable Housing Supplementary Planning Document (SPD). As you are aware, all Local Development Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). While the draft Supplementary Planning Document is not a Development Plan Document, it is considered to be a Local Development Document. As such the Mayor may give an opinion as to the general conformity of the Local Development Document with the London Plan under section 24(5) of the PCPA 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.</p> <p>This letter provides advice and sets out where you should consider making amendments so that the draft document is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021 and now forms part of the London Borough of Richmond Upon Thames' Development Plan.</p> <p>The threshold approach</p>

		<p>Richmond’s current Local Plan was adopted in July 2018 and the draft SPD supports the affordable housing approach set out in that Plan. Local Plan Policy LP 36 is not consistent with the Mayor’s threshold approach to affordable housing which is set out in Policies H4 and H5 of the LP2021. Instead the policy promotes and relies on the use of viability testing to determine the maximum reasonable amount of affordable housing that can be delivered on a case by case basis.</p> <p>It is noted that paragraph 3.6 of the draft SPD currently reads,</p> <p>“The Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to the strategic borough-wide target set out in the Local Plan and the individual circumstances of the site, including the financial capacity to contribute towards affordable housing.”</p> <p>Consequently, it is clear that the intention of the draft SPD is to continue to promote the maximum reasonable approach to affordable housing delivery by viability testing all major residential proposals (over ten dwellings) on a case-by-case basis. This approach has consistently led to low levels of affordable housing delivery in London and is the reason why the Mayor has developed an alternative threshold approach for the delivery of affordable housing which embeds affordable housing requirements into land values.</p> <p>Policy DF1 part A of the LP2021 is clear that the use of viability evidence to underpin affordable housing delivery should be limited only to those instances where there are clear barriers to its delivery. Aligned with this, the Mayor’s threshold approach seeks to limit the use of viability evidence to those situations where schemes genuinely cannot deliver 35% or more affordable housing without grant on privately owned land (or 50% on publicly owned land and on industrial land where it would lead to a loss of industrial capacity).</p> <p>The Mayor notes paragraph 4.5 of the draft SPD which states that</p> <p>“Until weight can be given to the emerging policy, the Mayor’s threshold approach will only apply on referable schemes; on schemes which do not meet the referable criteria for call-in by the Mayor, the Council will continue to seek to influence sitespecific viability discussions...”</p> <p>This would mean that the Mayor’s threshold approach would not apply to major planning applications below the referral threshold- resulting in fewer numbers of affordable homes being delivered.</p>
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	<p>In Richmond over the period between 2016/17 and 2018/19 major developments contributed an average of 22% affordable housing. In contrast, the report, Affordable Housing in Planning Applications Referred to the Mayor of London (March 2022)¹ clearly illustrates the positive effect the threshold approach is having on the delivery of affordable housing across London. In 2021 the average level of affordable housing per scheme was 43 per cent by unit and 45 per cent by habitable room. The analysis indicates that the proportion of affordable housing secured in referable applications has increased significantly in recent years. 82% of referable schemes approved in 2021 will provide 35% or more affordable housing (by habitable room). For each of the last three years, 35% or more affordable housing has been secured in more than three quarters of referable applications. In 2021, 61% of eligible schemes followed the Fast Track Route, up from 52% in 2020 and 38% in 2019.</p> <p>The LP2021 was formally published in March last year and therefore forms the most up-to-date part of Richmond’s Development Plan. Furthermore, the Council’s use of the maximum reasonable approach has resulted in low numbers of affordable housing while the threshold approach is seeing consistent increases across London. In light of this, Richmond should give the Mayor’s threshold approach set out in Policy H5 the full weight accorded the Development Plan under S38(6) of the Planning and Compulsory Purchase Act 2004 – and this should be applied to all major development proposals. Through the application of the threshold approach to all major residential proposals Richmond is far more likely to deliver more affordable housing.</p> <p>In addition, Richmond should also note that the threshold approach would speed up the planning process and would be less resource intensive than viability testing all major residential proposals (apart from those referred to the Mayor) under the policy target of achieving 50% affordable housing.</p> <p>The draft document should also make it clear that public sector landowners with a portfolio agreement with the Mayor, such as Transport for London, may provide 50% affordable housing across their portfolio of sites - provided at least 35% affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35%.</p> <p>Tenure mix</p> <p>The proposed tenure mix set out at paragraph 3.14 of the draft SPD reflects the mix set out in the current Local Plan. This is for 80% affordable rent and 20% intermediate housing. While the Mayor recognises and understands that there is a greater need for affordable rented housing in London the proposed affordable housing tenure mix diverges from the requirement in Policy H6 of the LP2021. Policy H6 sets a requirement that at least 30% of affordable housing should be for low-cost rented homes and at least 30% should be for intermediate products. The policy gives boroughs considerable flexibility allowing boroughs to allocate the remaining 40% requirement according to borough but should be based on local and up-to-date</p>
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		<p>evidence. The minimum level of intermediate housing should therefore not be less than 30% to be consistent with Policy H6 and it should be amended accordingly.</p> <p>Build to rent housing Paragraph 5.4 of the draft SPD states that “...private rented sector schemes that do not contribute to the higher priority need for affordable housing are unlikely to be supported due to the overriding need for affordable housing...”.</p> <p>It should be recognised that Build to Rent housing differs from traditional private rented sector housing. The Mayor supports boroughs in taking a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes and paragraph 4.11.1 of the LP2021 sets out how this housing product can be beneficial in London, for example by providing better management standards and better quality homes than much of the mainstream private rented sector. The draft SPD should differentiate between build to rent and private rented housing and should be consistent with Policy H11 of the LP2021.</p> <p>Build to Rent housing proposals are required through Policy H11 of the LP2021 to provide affordable housing so paragraph 5.4 of the draft SPD is incorrect. The Mayor’s threshold approach to affordable housing applies to Build to Rent housing and this should be made clear in the draft SPD. Policy H11C of the LP2021 is clear that to follow the Fast Track Route (see Policy H5 of the LP2021), schemes must deliver at least 35%, or 50% where the development is on public sector or industrial land (where residential development would result in a loss of industrial capacity). Richmond should also note that the LP2021 at paragraph 4.11.10 makes it clear that boroughs can require a proportion of low-cost rent on Build to Rent schemes in accordance with Part A of Policy H6. Low-cost rent homes must be managed by a registered provider.</p> <p>With respect to paragraphs 6.1 and 6.2 regarding industrial land, the correct approach to proposed residential development on industrial land is set out in Policy E7 of the LP2021. That policy seeks to protect industrial ‘capacity’ as opposed to industrial ‘land’ and in some circumstances residential development within industrial areas may be considered appropriate where it meets the requirements of that policy. Within Locally Significant Industrial Locations the Mayor would support co-location with residential uses where the requirements set out in Policy E7B of the LP2021 have been met through a plan-led or a masterplanned approach. It should also be noted that the LP2021 could support residential development proposals on non-designated industrial land where it meets the requirements of Policy E7C.</p> <p>Summary</p>
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		<p>As currently written the draft SPD is not in general conformity with the LP2021 due to the failure to apply the Mayor's threshold approach to affordable housing to all major residential proposals set out in Policy H5 and for a failure to apply the minimum affordable housing tenure requirements set out in Policy H6 of the LP2021.</p> <p>I hope these comments help to positively inform the ongoing development of Richmond's Draft Revised Affordable Housing SPD.</p> <p>-----</p> <p>¹ https://www.london.gov.uk/sites/default/files/affordable_housing_in_planning_applications_referred_to_the_mayor_2011-2021.pdf</p>
4	Nick Dexter, Heathfield Labour Party	<p>I make the following comments on this draft SPD on behalf of Heathfield Labour Party.</p> <p>What were the choices available in drafting the SPD either to increase or decrease the scope for the Council to give planning permission in the future for affordable housing? In this respect, why is the draft different from the current SPD, and why is it different from any other London borough's?</p> <p>Assuming by "prioritise the delivery of affordable housing" the SPD is aimed at increasing the amount of affordable housing, by how much and over what time period is that increase to be expected?</p> <p>In what specific way has the SPD been drafted to meet the new 1,000 affordable homes target?</p>
5	Kelly-Marie Tuthill	<p>My feedback is all the while affordable housing is considered 80% of market value it cannot be considered affordable.</p> <p>Most people aged under 35 are on £30k or less as opposed to the under £50k parameters set in the document.</p> <p>Central and local government need to massively rethink this!</p> <p>Especially considering inflation and the costs rising from energy, food, tax so on and so forth.</p> <p>Until then these policies are nothing but a talking shop that sounds good but in reality achieves nothing.</p>
6	Wendy Micklewright	<p>Subject:mental illness is a lie - BLACK LIVES MATTER - please include this in your work around housing</p>

		<p>Hope you are good + thank you for all you do....</p> <p>I forgot to mention community land trusts - universal basic income - people assemblies - participatory budgeting ...</p> <p>Mental illness is a lie – which causes untold suffering + distress....</p> <p>Please see our website (which includes FOI requests / research) + UTUBE detailed below...</p> <p>Please include this in your work</p> <p>Emotional CPR: Heart-Centered Peer Support</p> <p>Website – Emotional CPR</p> <p>Restraint, segregation and seclusion review: progress report</p> <p>Out of sight- who cares?</p> <p>I do not attend online meetings generally – in solidarity – with many people I know who are digitally excluded for many reasons...</p> <p>I am not a big fan of surveys – ask certain questions get certain answers....</p> <p>When are people going to listen to us – not paid researchers?</p> <p>The problem is poverty – not individuals being "gaslighted" into thinking they are mentally ill..</p> <p>I think it is important to stress hearing voices is not an illness...</p> <p>I understand the conflict between working in the system + challenging the system – it is however important to stress if people do not want the drugs they should be supported to come off the drugs...</p>
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This information maybe useful to you?

[Sedated, How Modern Capitalism Created our Mental Health Crisis - James Davies +](#)

[Cracked : why psychiatry is doing more harm than go](#)

Jeremy Howick – [We don't know whether most medical treatments work, and we know even less about whether they cause harm – new study](#)

[Jock McLaren – The Biopsychosocial Model is a Mirage, Time for a Biocognitive Model?](#)

[Combatting Structural Racism and Classism in Psychiatry: An Interview with Helena Hansen](#)

[How Western Psychology Can Rip Indigenous Families Apart: An Interview with Elisa Lacerda-Vandernorn](#)

[Suman Fernando's book Institutional racism in psychiatry + clinical psychology](#)

[Whiteness as a chemical restraint in statutory guidance of the Mental Health units \(Use of Force\) Act 2018 – a tribute to Seni's law + Aijibola Lewis](#)

Blog by Colin King via NSUN

[A straight-talking introduction to Psychiatric drugs – the truth about how they work + how to come off them – Joanna Moncrieff](#)

[People deprived of liberty due to misapplication of Mental Health + Capacity Acts](#)

[Half of people with a learning disability and autistic people reluctant to provide feedback on care](#)

[Women disproportionately affected by soaring Mental Health Act detentions](#)

[Report Finds Monitoring of Electroshock Treatment Unsafe](#)

		<p>New Study Finds ECT Ineffective for Reducing Suicide Risk</p> <p>Repeal provisions for Community Treatment Order</p> <p>Provide Tapering Strips for People Who Want to Withdraw Safely from Psychotropic Drugs</p> <p>Petition by James Moore</p> <p>Tapering strips</p> <p>Long-term antipsychotic use linked to breast cancer</p> <p>NICE Guideline Update Acknowledges Severe Antidepressant Withdrawal</p> <p>Council of Europe Releases Report to Promote Voluntary Mental Health Treatment</p> <p>Healthy foundations: integrating housing as part of the mental health pathway</p> <p>Mental Health Act reform: race and ethnic inequalities</p> <p>Coronavirus and depression in adults, Great Britain: January to March 2021</p> <p>ONS</p> <p>“Almost 4 in 10 adults earning less than £10,000 a year experienced depressive symptom compared with around 1 in 10 earning £50,000 or more”</p> <p>The data shows what we know to be true: struggling with your mental health doesn’t happen in a vacuum.</p> <p>Why not Diagnose Social Conditions Instead of Individual Symptoms?</p>
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[The WHO Calls for Radical Change in Global Mental Health](#)

Our work is cited as best practise by the WHO...

Hope we have a good week

In love + solidarity

Wendy Micklewright

FOR INFORMATION

To quote Andy Burnham...

If we wait for the "powers that be" we will wait forever? so best if we just do it ourselves?

Citizen control	Degree of citizen power
Delegated power	
Partnership	
Placation	Degree of tokenism
Consultation	
Informing	
Therapy	Non participation
manipulation	
Old power	New power
Currency	Current
Held by few	Made by many
Pushed down	Pulled in
Commanded	Shared

		<table border="1"> <tr> <td>Closed</td> <td>Open</td> </tr> <tr> <td>transaction</td> <td>relationships</td> </tr> </table> <p>From Paternalism to Human rights YOUTUBE - https://www.youtube.com/channel/UCgiAtYMh6O_Vv13Lf7v7wNg</p> <p>Friendship group website - https://e-voice.org.uk/friendship-group/</p>	Closed	Open	transaction	relationships
Closed	Open					
transaction	relationships					
7	<p>Luke Burroughs, Transport for London (TfL) Commercial Development</p>	<p>Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning may provide a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</p> <p>Tfl broadly welcome the document but suggest the following alterations:</p> <p>Development on Public Land Paragraph 3.7 of the draft document states <i>“in line with the London Plan Policy H4, the Council will expect that sites on public sector land deliver at least 50% affordable housing. Marketing for the disposal of public sector land should clearly set out this requirement. For public sector land, the applicant/developer will need to provide strong justification as to why a scheme would not be able to meet the 50% policy requirement.”</i></p> <p>London Plan Policy H4 (Delivering Affordable Housing) states <i>“The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include: ...public sector land delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio”</i></p> <p>Supporting paragraph 4.4.7 goes on to identify that <i>“Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 per cent”</i></p>				

		<p>The draft document does not make reference to public sector landowners with a portfolio agreement with the Mayor, such as Transport for London. It should identify that those public sector landowners with portfolio agreements may provide 35 per cent affordable housing on individual sites with the required affordable housing tenure split on the initial 35%.</p> <p>Threshold Approach Paragraph 4.5 states <i>“The London Plan and the Mayor of London’s Affordable Housing and Viability SPG set out a threshold approach³, which means that schemes providing 35% affordable housing with a tenure compliant mix do not need to provide viability information and are not subject to a late stage review (refer to paragraph 10.3). This is not addressed in the current Local Plan and the new Local Plan will set out the local circumstances to evidence a policy position. Until weight can be given to the emerging policy, the Mayor’s threshold approach will apply on referable schemes; on schemes which do not meet the referable criteria for call-in by the Mayor, the Council will continue to seek to influence site-specific viability discussions and to establish, through discussion with housing and planning officers, whether proposed tenure and affordability will reflect local needs, and if there is a funding opportunity to enhance delivery”</i></p> <p>TfL CD do not support this approach and believe that in line with London Plan Policy H5 (Threshold Approach to Applications) any schemes meeting the criteria set out in the policy should qualify for the threshold approach. It is would not be compliant with the London Plan to only apply this policy to referable schemes.</p> <p>Concluding Remarks We hope that these representations are helpful but if you require any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forward.</p>
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