

# The Planning Bureau Limited

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24<sup>th</sup> July 2023

Dear Sir / Madam

## **McCARTHY STONE RESPONSE TO THE LONDON BOROUGH OF RICHMOND LOCAL PLAN PUBLICATION CONSULTATION, JUNE 2023**

Thank you for the opportunity to comment on the London Borough of Richmond Local Plan Publication Consultation, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

### **Policy 11: Affordable housing**

#### **Policy 11, point A and B**

Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023 (Publication draft). McCarthy Stone is the leading provider of specialist housing for older people in the UK.

We note that Policy 11: Affordable Housing, Point A, states that *'all new housing developments in the Borough should provide at least 50 per cent of the total number of habitable rooms as affordable housing on site'*. The policy then attempts to request greater than 50% affordable housing from points B1, B2 and B3. This is a higher requirement than the strategic target of 50% of all new homes in London to be 'genuinely affordable' detailed in Policy H4: Delivering affordable housing of the London Plan.

In addition, the Local Plan Viability Assessment, BNP Paribas, April 2023 (LPVA) identifies at para 7.2 that *'The results do not point to any particular level of affordable housing that most schemes can viably deliver and we therefore recommend that the 50% target be retained, and applied on a 'maximum reasonable proportion' basis taking site-specific circumstances into account. This reflects the Council's current practice and also the approach in the 2021 London Plan'*. Requiring an 'at least' level of affordable housing is therefore inconsistent with the Local Plan and advice within the Council's own LPVA.

Our representation to the Draft Local Plan pre-publication consultation noted that the 'Pre Publication Draft Local Plan (Reg 18) was not supported by a Local Plan Viability Assessment (LPVA) and reminded *'the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the LPVA. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period"*.

We are disappointed therefore, given the great need for older persons housing (discussed in our response to Policy 12) in the Borough, that the LPVA has not tested the viability of older person's housing. We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *"The role for viability assessment is **primarily at the plan making stage**. Viability assessment **should not compromise sustainable development but should be used to ensure that policies are realistic, and***

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***that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.....Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.***”(Paragraph: 002 Reference ID: 10-002-20190509).

The Council must therefore ensure that the LPVA is updated to include the older person’s typology of sheltered and extra care housing as a minimum and re-consulted upon. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need and that the typology should be tested at the Local Plan Stage. We would direct the Council towards the Retirement Housing Groups guidance on viability testing entitled ‘A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 (‘RHG Briefing Note’) available from [COMMUNITY INFRASTRUCTURE LEVY \(retirementhousinggroup.com\)](http://retirementhousinggroup.com). that discusses how older persons housing differs from mainstream housing. If older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing.

#### **Recommendation**

**In order for the plan to be consistent with national policy and justified the Council should update the LPVA to include the older persons housing typology of sheltered and extra care housing and re consult.**

#### **Policy 11 point G and Para 17.28 – Review Mechanisms**

Point G of policy 11 G requires sites that do not deliver 50% affordable housing to be subject to a early, mid and late stage review and for sites that meet the 50% target to have an early stage review. This is reconfirmed in para 17.28. Para 17.28 sets the early stage review at 18 months after the decision date.

It appears that the Council intend to burden all development with a review mechanism, even a schemes is already committing to deliver 50% affordable housing. To burden development which has either already committed to delivering 50% affordable housing or has already been found to be not viable at the Local Plan stage with a review mechanism at just 18 months post planning permission is wholly inappropriate and inflexible.

It is considered that, given the more challenging viability position that older persons housing has, this means that as currently written, all specialist housing to meet the needs of older people will have to go through the delay and uncertainty of a review mechanism. This will impact on the number of sites coming forward for much needed older persons housing which is already negligible, particularly for the middle market in the Borough.

Housing for older people, being specialist in nature as defined by Paragraph: 010 Reference ID: 63-010-20190626 of the PPG on Housing for Older and Disabled people, is often delivered on small brownfield sites separate to housing allocations or other development sites of around 0.5 hectares. Schemes tend to be high-density flatted developments located near town centres that have around 35 to 40 units.

Paragraph: 009 Reference ID: 10-009-20190509 of the government guidance on Viability states the following: *‘Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.*

With respect to planning obligations or s106, Para 57 of NPPF states *‘Planning obligations must only be sought where they meet all of the following tests <sup>26</sup>:*

- (a) necessary to make the development acceptable in planning terms;*
- (b) directly related to the development; and*
- (c) fairly and reasonably related in scale and kind to the development’*

In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point.

There must therefore be a reasonable justification for imposing such a review mechanism. The requirement for a review mechanism at paragraph 17.28 is not supported by any justification, evidence, or process where specific inputs to be included within any review mechanism, could be considered in public examination. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. In addition, certain exemptions should be introduced such as to smaller sites, that are built in one phase, such as older persons housing. The Planning Inspectorate have repeatedly noted that review mechanism for smaller sites, and single-phase developments are unnecessary so this must also be a consideration.

Requiring a small single phased site that would likely to already been found to be not viable when Planning Inspectorate have repeatedly noted that review mechanisms are unnecessary is inflexible and unreasonable and exemption should be provided.

**Recommendation:**

**Delete Policy 11. G as follows:**

~~**G. If a site proposes a non-compliant level of affordable housing and is granted permission it will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion of the development, including an advanced stage review mechanism. Sites that meet the 50% target for affordable housing will not be subject to a late stage review, only an early stage review to incentivise implementation**~~

**Para 17.22 – threshold approach**

We note that Paragraph 17.22 advises that the approach required by London Plan 'Policy H5: Threshold approach to applications' is not applicable in the Borough as *'Richmond's affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.'*

However, the LPVA has shown that many of the variables tested were not viable with the 50% affordable housing target. Setting a more onerous requirement than even the London Plan is not realistic and the total cumulative cost of all relevant policies will undermine deliverability of the plan and will simply require a large amount of planning application to have to be viability tested at the application stage, contrary to PPG Paragraph: 002 Reference ID: 10-002-20190509 that states *'The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan'*. The Council should note that monitoring of the London plan affordable housing delivery rates has shown that since the FTR including 35% affordable housing was introduced affordable housing delivery has in fact increased not decreased.

**Recommendation:**

**The Council should delete paragraph 17.22 and enable scheme promoters to go down the London Plan FTR to deliver affordable housing without the burden of a review mechanism as follows:**

~~**17.22 London Plan Policy H5 has set out a threshold approach where if a site meets 35% affordable housing or 50% in the case of public sector or industrial land, then they will not need to submit a viability assessment at the application stage. This policy is aimed at fast tracking applications through the system that provide the threshold level without being held up by potentially protracted discussions regarding viability. Richmond's affordable housing need is so great and the Borough has such a limited supply of major sites, using the threshold approach would have a detrimental impact on the Council achieving its goal of providing 50% affordable housing across the Borough.**~~

### **Para 17.19 - Vacant Building Credit**

Para 17.19 states that 'In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply'.

However, considering the examinations in public of other London Borough plans, it is likely that this element of the policy has been introduced to the Local Plan to reflect the Draft London Plan. However, the London Plan Examination in Public: Panel Report October 2019 recommended (para 236) that this policy be deleted as it was inconsistent with national policy on Vacant Building Credit and that the departure from national policy on Vacant building Credit was not justified with sufficient evidence. It does not appear that the London Borough of Richmond have any local evidence to justify departure from national policy on Vacant Building Credit and therefore Point M should be deleted.

The second section of para 7.19 should therefore be deleted as it is inconsistent with NPPF para 64 on vacant building credit and a departure from national policy guidance on planning obligations Paragraph: 026 to 028 Reference ID: 23b-026-20190315. No evidence appears to have been published to depart from government policy.

#### **Recommendation:**

Delete the following text from para 17.19:

~~**The affordable housing provision (on site or off site) or any financial contribution should be calculated in relation to gross rather than net development. In London the majority of development is brownfield and does not need to be incentivised, as in many cases the building will only have been made vacant for the sole purpose of re-development, therefore the Vacant Building Credit will not apply. A flowchart outlining the policy requirements and the mechanism for assessing the contributions from individual sites is set out in the Affordable Housing SPD, including how each proposal is assessed to make an adequate contribution towards affordable housing which is directly, fairly and reasonably related in scale and kind to the development proposed. It is considered necessary to make it acceptable in planning terms, and the absence of an obligation will be considered as undermining the Council's housing strategy and harm the provision of affordable housing in the area.**~~

### **Policy 39 – Biodiversity and Geodiversity**

Policy 39 point 5. Requires development 'to provide a measurable 20% net gain for biodiversity, in line with the latest available version of the DEFRA metric'.

The Council should not set a higher biodiversity net gain (BNG) requirement for development in Richmond than that set out in the Environment Act 2021. Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular a greater than 10% requirement is not necessary to make the development acceptable in planning terms. A 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF).

Although we recognise that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or a significant reduction in the developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements.

The Council should therefore not require a BNG of greater than the 10%.

#### **Recommendation:**

**Amend Policy 39 point 5 as follows:**

**5. requiring the following development proposals to provide a measurable 1020% net gain for biodiversity, in line with the latest available version of the DEFRA metric:**

## **Policy 48 Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management**

Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

The policy supports the parking standards set out in the London Plan whilst at point F suggests that car free developments may be appropriate in certain situations. The London Plan however promotes car free development in PTAL areas 4,5 and 6.

The Council should note that whilst we can understand the rationale behind car free developments in accessible locations in general housing in London, we consider that a requirement for a car free development for critically needed specialist older persons' housing to be inappropriate and unnecessary given the policy requirement in London Plan policy GG1 for older people to 'be able to move around with ease'. Purpose built older person's housing has residents whose needs are substantially different to users of mainstream housing and therefore should be considered on its own case with respect to car parking. Residents of older persons housing, given their age, tend to be frail and are more likely to have mobility difficulties and in some cases in need of a car to move around with ease. They also tend to have frequent visits from carers who often need to drive and therefore an exemption to this policy of individual car parking standards for older persons housing should be considered.

McCarthy Stone has undertaken research of existing developments that identifies that an average car parking provision of 0.55 spaces per apartment is needed to meet the parking needs of residents, carers, visitors and house managers.

The policy should therefore exempt older persons housing schemes from providing car free developments.

### **Recommendation**

**Add to end of Policy 48 point F a new point 9 stating 'older person's housing schemes, due to the nature of some residents who will be reliant on private transport either for themselves or their carers, are exempt from providing car free developments'.**

### **Policy 4 – Minimising Greenhouse Gas Emissions and Promoting Energy Efficiency (Strategic Policy)**

#### **Policy 6 Sustainable Construction Standards**

Policy 4 and 6 appear to be confused and needs clarification. Policy 4 point D 1. seeks '*to achieve net-zero carbon with a minimum of 60% on-site reduction;*' but what is this reduction measured against? Is it the building regulations or is it the Council's intention to fall in line with the Future Homes Standards? Para16.11 then states '*All development (residential and non-residential) should be net-zero, which means that a certain percentage of regulation carbon emissions has to be achieved on-site (see Table 16.1 above), with the remaining emissions (up to 100%) to be offset through a contribution to the Council's Carbon Offset Fund.*'. Policy 4 then seeks a £300 per tonne contribution for off-site delivery as it is '*considered*' that the London Plan off set price of £94/tonne is too low'. There also seems to be some cross-over with Policy 6 Sustainable Construction Standards that requires developers to complete a Sustainable Development Checklist and to achieve a four star rating under the BRE Home Quality Mark Scheme.

The Council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable. However, currently it appears that the Council is aiming to achieve this through having mandatory standards from adoption of the plan that may go beyond government targets but this is not clear. However, it is our view that any requirement should be 'stepped' in line with Government targets and the proposed changes to the Building Regulations. This is more desirable as there is considerable momentum from Government in preparing enhanced sustainability standards as it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years. Aligning the Council's requirement for carbon neutral development with those of Government would therefore be pragmatic and more achievable without adding additional cost through carbon off-set.

It is therefore recommended that requirements are stepped in line with government targets and the Council consider combining policies 4 and 6.

**Recommendation:**

- **That the policy is re-worded and stepped in line with emerging government targets**
- **Policy 4 and 6 are combined for clarification. or**
- **The policy is deleted as Net Zero Carbon development is to be dealt with via the Building Regulations.**

**Policy 12 - Housing Needs of Different Groups**

Thank you for the opportunity to comment on the draft London Borough of Richmond Local Plan Publication Consultation, June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing as confirmed within Paragraph 60. The NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

*"The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**" (emphasis added).*

Paragraph 003 Reference ID: 63-003-20190626 recognises that:

*"the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support."*

Thus, a range of provision needs to be planned for. Paragraph 006 Reference ID: 63-006-20190626 sets out:

*"plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."*

**Benefits of Housing for Older People**

Older Persons' Housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

**Economic**

A report *"Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living"* by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.

- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

A further report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)*" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

### Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

### Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

### Extent of Older Person's Housing Need

Para 17.33 of the Publication draft plan identifies that the needs for specialist housing for older people has been assessed by Housing LIN entitled '*Assessment of need for specialised housing and accommodation for older people in Richmond*', December 2021. This assessment concludes at para '4.02 Housing for older people (retirement housing and contemporary '*sheltered housing*'). *The estimated net need for specialised housing for older people to 2039 is c.1,070 units of which c.800 for sale and c.270 for social/affordable rent*' and at '4.03 *Housing with care (extra care housing). The estimated housing with care net need to 2039 is c.420 units of which*

*c.210 for social/affordable rent and c.210 for sale*. Policy 10 identifies that the 'Boroughs ten year housing target is 4,110 homes'. The need of specialist housing to meet the needs of older people totals 1,490 (retirement / sheltered and extra-care housing) to 2039, over a ten year period **this would make up almost 20% of total housing need**. This is a substantial proportion of housing need. **Given the substantial need, and benefits specialist housing to meet the needs of older people brings, developers of older person's housing schemes should not be required to demonstrate need**. In light of the urgent need to significantly increase the delivery of specialist older persons' housing in the Borough and across Greater London, we consider that the Plan should provide a more positive framework to ensure delivery. Point B. should be amended accordingly.

#### Accessibility

We note that Point B 2. States that *'All residential uses should demonstrate how higher standards of accessible and inclusive design have been met'*. It is not clear if this is suggesting a higher accessibility standard than that required under Policy 13 – Housing Mix and Standards or the same.

It is common for Local Authorities to conflate the needs of 'wheelchair users' with the needs of older people in the community. The Council are respectfully reminded that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the substantial housing needs of older people. Adaptable houses do not provide the on-site support, care and companionship of specialist older persons' housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. Housing particularly built to M4(3) standard may serve to institutionalise an older persons' housing scheme reducing independence contrary to the ethos of older persons.

#### Deliverability

We would remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *"The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the Council's planning obligations and building requirements should therefore be robust.

The viability of specialist housing for older people is more finely balanced than 'general needs' housing. We are strongly of the view that these housing typologies should be robustly assessed through the Local Plan process. However currently the LPVA has not assessed specialist housing to meet the needs for older people. To do so would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period*. Without such a viability assessment and evidence it is difficult for the Council to justify requiring specialist provider to deliver policy requirements to a higher standard than mainstream housing when viability is potentially worse.

The Council must therefore ensure that an up date to the LPVA is undertaken to inform the future plan. The new viability assessment must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the delivery of much needed older persons housing. Point B.2 should therefore be deleted as it is not clear and instead rely on the requirements of policy 13 – Housing Mix and Standards.

In addition, given our comments to Policy 11 Affordable Housing, and given that the Council has not yet tested the specialist housing to meet the needs of older people for viability reference to requiring developers to meet the affordable housing requirement should be deleted together with supporting paragraph 17.45 as the affordable housing requirement is not justified or consistent with national policy.

**Recommendation:**  
**Delete point B.1.**

~~1. All residential uses are expected to contribute to the highest priority affordable housing needs as set out in Policy 11 'Affordable Housing (Strategic Policy) ', and contribute to creating mixed, balanced and inclusive communities. The highest priority is for on-site general needs affordable housing.~~

Delete Policy 12 point B2:

~~All residential uses should demonstrate how higher standards of accessible and inclusive design have been met.~~

Amend Policy 12 point B. 3. To ensure that housing needs are supported and that our views detailed in our response to Policy 11 Affordable Housing are translated into policy 12.

B. 3. Proposals which provide adaptations and alterations to enable residents to live independently and safely remaining in their existing property will be supported. Proposals for new specialist older persons' housing will be assessed against London Plan Policy H13.7 The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. ~~where it meets identified local need as set out in the Council's Local Housing Needs Assessment, housing and commissioning strategies, including how an affordable housing contribution has been maximised. Applicants for specialist older persons' housing should demonstrate how the design will address the needs of people with dementia and other long term health conditions, and be informed by discussions with providers and demonstrate accordance with the Council's commissioning and housing strategies. An Operational Management Plan will be required to secure minimum levels of care and eligibility restrictions to prioritise local needs.~~

Delete para 17.45

~~17.45 However, as identified in the LHNA, the need for affordable homes remains substantial and is therefore a higher priority to those identified above. Where proposed residential provision does not itself meet the NPPF definition of affordable housing, affordable housing policy requirements as set out in Policy 11 Affordable Housing will be applicable to all site proposals for accommodation considered under this policy and it is expected that schemes will be designed to accommodate the priority needs for affordable housing alongside other types of housing for specific groups. As set out in Policy 11 Affordable Housing the threshold approach to fast track applications providing lower levels of affordable provision in proposals to meet the needs of different groups, such as affordable student accommodation or specialist older persons housing, is not considered appropriate in the Borough context given the significant land constraints and high level of general affordable housing need.~~

Thank you for giving us the opportunity to comment.

Yours faithfully



Natasha Styles  
Group Planning Associate