

29th March 2021

Lambeth Council
Planning Policy
PO Box 734, Winchester
SO23 5DG

By email : localplan@lambeth.gov.uk

Dear Sir/Madam

Main Modifications to the Draft Revised Lambeth Local Plan 2020 Representations on behalf of Coin Street Community Builders (CSCB)

On behalf of Coin Street Community Builders (CSCB), we submitted representations to the Submission Version of the Revised Lambeth Local Plan 2020 and appeared at the Examination in Public in relation to Main Matters 3: Housing and 9: Places and Neighbourhoods, especially in relation to Policy H8 and PN1 respectively.

Our comments to the Main Modifications to the Draft Revised Lambeth Local Plan focus on Policy H8 and also Policy Q26.

Policy H8

In relation to Policy H8, we note that the published Main Modifications propose to amend section (d) to read:

*'The council will support new specialist older persons' housing as defined in London Plan policy H13, **where it meets identified need**. The requirements of London Plan policy H13B will apply and 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.'* [my emphasis in bold]

The supporting text is also proposed to read:

5.78. The council is working towards reducing the reliance on residential care provision. Residents in Lambeth will be supported to live independently in their own homes or in the right supported housing environment. However, they should also be able to access specialist housing if they need extra support.

*5.78a The need for specialist older persons' housing in Lambeth over the plan period is set out in the Lambeth SHMA 2017 and reflected in the London Plan indicative benchmark of 70 additional units per annum (IND5 in the monitoring framework of this Plan, see Annex 8). Provision will be monitored against this indicative benchmark. This need is for the types of specialist accommodation identified in paragraphs 4.13.3 to 4.13.9 of the London Plan and does not include nursing homes. **There is sufficient nursing home accommodation in Lambeth to meet need over the plan period**: the priority is to continue to support people to remain independent for as long as possible in their own home whilst also maintaining the stock of existing nursing home accommodation.*

5.79. Proposals for the provision (or loss) of housing to meet specific community needs will be assessed having regard to Lambeth's Housing Strategy and associated client group sub-strategies as well as the advice of the Council and NHS integrated commissioning service for adult health and social care.



Proposals for the development of specialist housing should demonstrate that there is a local need for such accommodation.

[my emphasis in bold]

The following paragraph is also proposed to be deleted, further to the above changes:

5.85. Provision of specialist older persons' accommodation will be monitored against the London Plan annual borough benchmark (2017-2029).

Lambeth has stated that the joint position of LB Lambeth and the NHS is that there is no demand for additional nursing home beds in Lambeth over the plan period. However, Guy's and St Thomas's NHS Foundation Trust has welcomed Coin Street's proposal for a nursing home at Princes' Wharf/Gabriel's Wharf. At the Examination, Lambeth only presented evidence that the NHS Commissioners of London Borough of Lambeth & NHS South East London CCG consider that there is no demand for additional nursing home beds in Lambeth over the plan period, not other parts of the NHS.

CSCB consider that the fragility of the nursing home market is a relevant consideration when planning for future provision and evidence of this has been provided in CSCB's previous statements to the Examination. This is backed up by the Third Report of Session 2019-21 of the House of Commons Health and Social Care Committee on Social Care: funding and workforce, published October 2020, and referred to in CSCB's evidence to the Examination. CSCB consider that there is a real and likely prospect of loss of access to existing nursing homes to local authority funded older persons.

CSCB, based on research by an experienced consultant, and using methodology which is generally accepted in this field, state that there is demand for nursing care beds from both Lambeth and Southwark which would increase by 2027. Southwark has also identified support for further nursing home provision in the Waterloo area. CSCB especially consider that there a need for further **affordable** nursing home provision over the plan period to meet the needs of Lambeth (and Southwark) residents.

Paragraph 4.13.14 of the new London Plan 2021 emphasises the importance of care home accommodation and does acknowledge uncertainty as to the future position, stating:

*'Care home accommodation (C2) is an important element of the suite of accommodation options for older Londoners and **this should be recognised by boroughs and applicants**. To meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. The provision of Care Quality Commission rated Good or Outstanding care home beds is growing at around 3,525 bed-spaces a year in London and provision of dementia-capable bed spaces at a rate of 2,430 places a year. **If the rates of supply and demand remain constant it should be possible to meet potential demand for both care home beds and dementia care home beds.**'*

It should also be noted that the evidence base which led to these conclusions is now 4 years old and also that this policy refers to care homes and not specifically **nursing** homes. Notwithstanding, London Plan Policy H12 does reference *'reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation'*. The need for such accommodation was confirmed in CSCB's discussions with Guy's and St Thomas'.

In summary, the provision of nursing home accommodation is in a state of flux especially in relation to funding and affordability. The revised Lambeth Local Plan cannot predict with accuracy the future need across the plan period. It is therefore important that the Plan is sufficiently flexible to be fit for purpose going forward. CSCB consider that future changing needs should be acknowledged and request the following change to the Lambeth Local Plan:

'5.78a Lambeth's priority is to continue to support people to remain independent for as long as possible in their own home whilst also maintaining the stock of existing nursing home accommodation. Needs for additional nursing home accommodation in Lambeth will be monitored over the plan period'



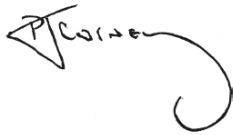
Policy Q26/Annex 11

In response to final changes to the London Plan, 2021, amended text is proposed to define a 'tall building' and to make it clear where they are appropriate (ie in line with Annex 11 or on site allocations).

CSCB made representations to the Submission Version of the Lambeth Local Plan in relation to the appropriate height of a building at Doon Street. As you are aware, the Doon Street site is the subject of detailed planning permissions, which have been lawfully implemented. The Secretary of State who determined the appeals carefully considered the visual impacts of the Doon Street scheme including in relation to heritage assets, having regard to very detailed information presented to the Inquiry. We attach a summary of these comments for ease of reference. On the basis of the detailed evidence base presented at the Inquiry and the Secretary of State's comments it is very clear that any reference to the acceptable height on the Doon Street site should be the height of the permitted scheme. In comparison, the evidence base used for the Local Plan preparation is rudimentary (tall buildings topic paper para 5.8) and states that applications would be needed for final decisions on heights (tall buildings topic paper 5.9). Where such an appeal decision exists, it is misleading to use less reliable evidence which leads to different guidance.

If you have any queries in relation to the matters raised above, please do not hesitate to contact us.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P Carney', with a long, sweeping flourish extending to the right.

Paula Carney
Director
CarneySweeney

