

LAMBETH LOCAL PLAN EXAMINATION OCTOBER/NOVEMBER 2020

Statement of Common Ground between London Borough of Lambeth, the Home Builders' Federation and Coin Street Community Builders

Matter 3.7 - Older Persons' Housing

Context

This is a statement of common ground (SCG) between the London Borough of Lambeth ('**LB Lambeth**'), the Home Builders' Federation ('**HBF**') and Coin Street Community Builders ('**CSCB**') to support the examination of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (the '**Draft Plan**').

Following discussion of Matter 3.7 on older persons' housing (in relation to Policy H8 in the Draft Plan) on 29 October 2020, the Inspector asked LB Lambeth, HBF and CSCB to work towards a SCG to address such matters as: (i) whether to refer to the 70 dpa benchmark from the London Plan policy H13 and Table 4.3; (ii) LBL response to CCSB's Rebuttal Document; (iii) clarifying and potentially expanding part (d) of the policy to underline the importance of older person's housing, and identify clearly the different types of older person's accommodation. This was recorded as Action 9 in the Inspector's list of actions arising from the examination hearings ([INS06b](#)).

LB Lambeth's proposed amendments

LB Lambeth has had regard to CSCB's 'rebuttal document' or supplementary statement on Matter 3 dated 27 October 2020. LB Lambeth and NHS integrated commissioning jointly issued a [response](#) to this document on 6 November 2020, which has been published on-line as a supplement to the Council's original statement on Matter 3. The joint position of LB Lambeth and the NHS, set out in these documents, is that there is no demand for additional nursing home beds in Lambeth over the plan period.

LB Lambeth has also had regard to suggested revisions to the wording of Policy H8 provided by Liz Clegg, Associate Director of Integrated Commission for LB Lambeth and NHS, at the request of the Inspector in response to Action 10 in the Inspector's list of actions arising from the examination hearings ([INS06b](#)). This proposed wording is included in Part 2 of this actions list.

LB Lambeth has further had regard to suggested revisions to the wording of Policy H8 provided by the HBF in their statement on Matter 3 and subsequently by email. These suggest in particular a clearer reference to the need for specialist older persons' housing and to the London Plan indicative benchmark, and that LB Lambeth should include a 'presumption in favour' of older persons' housing schemes where the benchmark for specialist older persons' housing is not achieved for the previous year. Whilst LB Lambeth has no issue with including clearer reference to the need for this type of accommodation and to the London Plan benchmark, LB Lambeth does not consider the inclusion of a 'presumption in favour' of this form of accommodation would be justified or consistent with national policy or in general conformity with the London Plan. The London Plan figure is clearly described as

an “indicative benchmark” in section A(1) of London Plan policy H13, and not as a target. Paragraph 4.13.9 of the London Plan makes clear that the role of the benchmark figure is to inform local level assessments of specialist housing need and makes no suggestion it should be used as the basis for a presumption in favour of this form of development. LB Lambeth has made a commitment in the Draft Plan to monitor delivery against this benchmark figure, which is included in the Draft Plan’s monitoring framework.

Having regard to all of the above, LB Lambeth’s proposed amendments to the wording of Policy H8 and associated supporting text in the Draft Plan are set out in red in Appendix 1 of this statement.

HBF comments

Areas of agreement

In the interests of improving the supply of housing for older people, and in line with national and London Plan policy, we agree that a direct reference to the London Plan indicative benchmark figure of 70 units of older persons housing a year in Lambeth within policy H8 would be beneficial.

Areas of disagreement

Given the non-binding character of the benchmark figures, HBF would like a clause stating that a ‘presumption in favour’ of older persons housing schemes will operate if the indicative benchmark older persons requirement of 70 units per annum has not been achieved in a previous year. This would be very beneficial in helping to meet this need.

CSCB comments

Areas of agreement

There is no express reference to nursing homes in the NPPF 2019.

Lambeth’s strategy is to continue to support people to remain independent for as long as possible in their own home but when this is no longer possible, a fully residential nursing home or care home is needed.

The SCG between LB Lambeth and LB Southwark (SCG08) covers health in section 4.4. It states that:

- health infrastructure planning in Lambeth reflects the priorities of the Lambeth CCG and that this approach has regard to and acknowledges potential movement of patients across the border between the two boroughs
- Southwark Council has worked with the Southwark CCG to ensure the need for new healthcare facilities and the transformation of services are achieved
- Both Lambeth and Southwark are home to regional hospitals that cater to health care needs beyond each administrative boundary.

- Both parties agreed to work collaboratively under the Out Healthier South East London programme
- Both parties acknowledge that there is likely to be cross border movement of patients between each borough but agree there are no known planning reasons why these movements cannot continue
- Both parties agree to work collaborative to plan for strategic cross border health facilities.

Areas of disagreement

Lambeth has stated above 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. Evidence has only been presented 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 Policy H13 and paragraphs 4.13.3 to 4.13.9 of the Intend to Publish London Plan 2019 are not applicable to nursing homes. Paragraph 4.13.14 of the same plan refers to care home accommodation (C2) but does not expressly refer to nursing homes and the expected increase in demand for nursing home beds. There is no policy or paragraph in the Intend to Publish London Plan that expressly covers nursing homes.

In relation to the second paragraph of the 'areas of agreement' above, CSCB consider that it is also important to note that 48% of the demand for care and nursing homes is for nursing home beds.

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 statements. 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. 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, the earliest CSCB's proposed nursing home could be built. Southwark has also said it considers that there would be a demand for the nursing beds proposed by CSCB. Southwark has identified support for further nursing home provision in the Waterloo area.

There is a growing trend to more self-funded care (care and nursing).

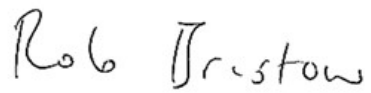
Lambeth consider that there is sufficient nursing home accommodation in Lambeth to meet needs over the plan period and that provision is not expected to change. CSCB consider that there a need for further **affordable** nursing home provision over the plan period to meet the needs of Lambeth (and Southwark) residents.

Nursing homes can be provided via different models and CSCB has a track record of providing affordable community and public facilities and programmes.

CSCB consider that Policy H8 should expressly acknowledge the need for the provision of additional and affordable nursing home beds over the plan period.

Signatures

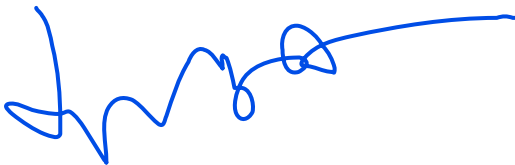
For LB Lambeth



Rob Bristow
Director Planning Transport and Development

Date: 27 November 2020

For HBF



James Stevens
Director for Cities

Date:

For CSCB



Iain Tuckett
Group Director
Coin Street Community Builders

Date: 27 November 2020

Appendix 1

LB Lambeth's proposed amendments to Policy H8 and supporting text are shown in red below:

H8 Housing to meet specific community needs

- a) The council will support the provision of housing to meet specific community needs, across a range of tenures, where it is demonstrated that the accommodation:
 - i. would meet an identified local need;
 - ii. will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and/or care;
 - iii. is of a high design quality, relevant to client needs, including inclusive design and provision of internal and external space;
 - iv. will be accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers;
 - v. makes adequate provision for ~~visitor / carer~~ parking for visiting health and care professionals and, where appropriate, for the safe storage of wheelchairs and mobility scooters, in accordance with London Plan policy H13B;
 - vi. is on a site and in a location suitable for that particular use, having regard to amenity, transport and other environmental impacts; and
 - vii. contributes to creating a mixed, balanced and inclusive community.
- b) The loss of existing housing which meets identified specific community needs will be resisted unless it can be demonstrated that:
 - i. the accommodation is no longer needed and the new accommodation will instead meet another identified priority local need; or
 - ii. the existing floorspace accommodation will be adequately re-provided to an equivalent or better standard on-site or elsewhere in the borough.
- c) The council will support and encourage proposals which provide adaptations enabling residents to live independently and safely in their own homes.
- d) The council will support new specialist older persons' housing as defined in See also London Plan policy H13, where it meets identified need relating to specialist older persons' housing. 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.

Supporting text

5.77. Housing to meet specific community needs in Lambeth can include temporary accommodation for homeless households, sheltered housing with care support, reablement accommodation (intensive short-term), accommodation for victims of domestic abuse and/or violence, staffed hostels, residential-care and nursing-care homes, extra-care

housing, and supported housing provision for children, people with physical and learning disabilities or those with mental health issues who require additional support, older persons and other client groups. These forms of specialist housing often provide essential accommodation for the most disadvantaged and vulnerable residents. Housing to meet specific community needs does not include visitor accommodation. The need for short-term, medium-term and permanent supported and specialised accommodation within Lambeth is assessed in the Lambeth SHMA 2017.

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.

5.80. Proposals for specialist housing should also make provision, where appropriate, for properties with two bedrooms, to provide for live-in carers. The location, internal and external design of the buildings, and their accessibility should help facilitate independence and social integration. External amenity space provision should ~~conform~~ have regard to the Housing LIN Design Principles for Extra Care housing (2009) in the case of sheltered housing schemes; and to the Care homes for older people: national minimum standards (2003) in the case of residential and nursing care homes. Applicants are also advised to have regard to the 'HAPPI' design principles (Housing our Ageing Population Panel for Innovation Report 2009) and the Royal Town Planning Practice Guidance on Dementia and Town Planning (January 2017). Applications should demonstrate that appropriate provision is made on-site for the safe storage of wheelchairs and mobility scooters.

5.81. The council will also seek to ensure that developments make adequate provision for parking with reference to policy Local Plan policy T7, including for visiting health and care professionals, visitors and carers. ~~If appropriate parking provision for carers/visitors cannot be provided on site the council will require an assessment of available on-street parking or justification as to why such provision is not required, having regard to the scale and/or the location of development.~~

5.82. Applications should include detailed information regarding staffing requirements and visitors (including numbers of staff and visiting care professionals, staff working hours, visiting hours).

5.83. London Plan policy H13 sets out specific requirements for specialist older persons' housing, including in relation to delivering affordable housing when the accommodation falls

into the C3 use class (which includes sheltered accommodation and extra care accommodation). Co-housing schemes for older people are encouraged, subject to meeting other policy requirements.

5.84. Local Plan policy H3 sets out the exceptional circumstances in which proposals for change of use from C3 to C2 accommodation may be considered, with reference to the tests in Local Plan policy H8(a). Proposals for change of use from C2 to C3 accommodation must meet the tests set out in Local Plan policy H8(b) and Local Plan policy H5 with regards to external amenity space.

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