

Ms C Edwards
EIP Secretariat
GLA
City Hall
The Queen's Walk
London, SE1 2AA

4th December 2018

Dear Ms Edwards

Respondent No 1195, The Retirement Housing Consortium Draft London Plan, Format, Scope and Content of the Plan

Please find enclosed, written submissions as per Regulation 8(5) in respect of Matters 7 and 8 of the Examination in Public of the London Plan.

The submissions are made on behalf of the Retirement Housing Consortium. We are a group of independent and competing housebuilders specialising in sheltered housing for the elderly. Together as a group, we are responsible for delivering circa 90% of England's specialist owner occupied retirement housing.

Each of the aforementioned companies has historically sought to develop a greater presence in London and in so doing has taken steps to actively engage with the Mayor of London and the London Boroughs in the preparation of planning policy. Regrettably, we have collectively felt that our individual representations voicing concerns over emerging policy and protocol have not been given due regard and as such we are increasingly concerned that we will be unable to provide much needed specialist housing for older persons within London.

To assist the Examination this covering letter provides an introduction to the types of and need for specialist owner occupied retirement housing.

What is Specialist Retirement Housing?

Specialist retirement housing is an umbrella term to cover all types of specialist housing for older people from 'age-restricted' housing to 'Extra Care accommodation'. The common features of all types are the age restriction (which is controlled via a planning condition), their specific design to meet the needs of older people, and a range of on-site support services and shared spaces. The HBF's Retirement Home Builders Group (RHBG) defines it as:

- **Retirement Living** – *age restricted accommodation, typically for those aged 60 and above. Formerly referred to as "Category 2 housing" or sheltered housing and consisting of independent flats and / or bungalows with enclosed access, a communal lounge and other communal facilities such as a shared laundry and a guest suite. Importantly, on-site support is provided by a warden or house manager who is dedicated to the running of the development. Developments are typically between 30 and 60 units in size.*

- **Extra Care Housing** – Age restricted accommodation, also known as Assisted Living or Retirement Living Plus, typically for those aged 70 and above. The term is used for a complex of specialised accommodation, including individual apartments for older people and a range of on-site services including care in a style that can respond flexibly to increasing need whilst fostering independence as far as is possible in older age. In most Extra Care accommodation, people enter the unit of accommodation and the care services they receive are delivered into that unit as their needs increase with age or in the short term due to illness, post recuperative care etc. Significant shared services will be provided, such as a residents’ lounge, restaurant with on-site kitchen, function room, laundry, guest suite, well-being centres, hairdressers, and staff rooms, Developments are typically between 40 to 70 units in size.
- **Care Villages / Continuing Care Retirement Community.** Age restricted accommodation typically for those aged 70 and above. Similar to Extra Care but often much larger with some developments being up to 200 units. Schemes typically have higher levels of care which are generally delivered by transfer within the scheme from an independent living unit, in which low to moderate care is delivered, to a specialist unit or care home as resident’s needs progress.

For the avoidance of doubt, the umbrella term of ‘specialist retirement housing’ does not cover traditional forms of residential care such as Care or Nursing homes.

The socio-economic benefits of retirement housing are therefore well-proven and accepted in Government policy. These benefits fall into two key areas:

- **Reducing health and social care costs:** Without the right physical and mental support in place for older people, there is likely to be increased pressure placed on the health service and adult social care due to an increase in slips, trips and falls as people age in accommodation no longer suitable for their changing needs. Key in this regard is loneliness. Specialist retirement housing immediately provides a base for addressing this. Research shows that loneliness and social isolation are harmful to our health: lacking social connections is a comparable risk factor for early death as smoking 15 cigarettes a day¹ and is worse, especially for older people, than well-known risk factors such as obesity and physical inactivity and mental health issues. Alleviating loneliness is vital to enabling older people to remain independent. Lonely individuals are also more likely to visit their GP, have higher use of medication, higher incidence of falls and increased risk factors for long term care.
- **Unlocking the housing chain:** Retirement housing frees up under-occupied housing. Research by Savills identified that for every retirement property bought, three further moves in the housing chain are made possible. Our own research shows that the chains we create typically result in a young person or family leaving the rental market and joining the housing ladder.

The Need for Specialist Retirement Housing

In terms of the specific need for housing for older people, the 2017 London Strategic Housing Market Assessment states the following:

London is expected to experience substantial growth in its older population over the coming years. The number of people aged 65 or over is projected to increase by 73% between 2016 and 2041, and the number of those aged 75 or more by 94%.

While many older people will continue to live in mainstream housing, a growing number are likely to require specialist accommodation. Research commissioned by the GLA identified a total potential demand across all tenures for just over 4,000 'C3' specialist homes for older people over 60 years of age (both extra-care and sheltered housing) every year between 2017 and 2029.

Whilst we do not accept the reference to Extra Care uses under the classification of use class C2 and through the our responses to the Draft Plan and the submissions to the EIP this matter will be explored further, the need for specialist housing for the elderly is clear; a large constituent of London's population mix will be made up of the elderly and a diverse range of accommodation to meet their needs will be required. Further development must also be encouraged and not stifled with overly prescriptive policies and constraints.

Delivering Specialist Retirement Housing in London

Additionally, whilst there is an acknowledged need to provide more housing specifically designed for older people, there are many barriers to its delivery. Good sites for such development are increasingly difficult to find and different economic and viability considerations apply to mainstream housing including generally higher acquisition costs, build costs, slower sales rates and the need to provide non saleable communal areas (as recognised by the current London Plan at Paragraph 3.50c). These all contribute to the challenges in competing for sites against different land uses, and then delivering on the sites that are acquired. This is particularly the case in London

Table 3.38 of the most recent Annual Monitoring Report (AMR) advises that 624 units of specialist older persons' accommodation were approved in 2016/17. However, DLP Policy H15 advises that there is a need to deliver 4,000 units per annum of older persons' accommodation to meet the total potential demand for this form of accommodation (paragraph 4.15.4 of the DLP). There would need to be an increase in output in this sector by **circa 600%** per annum to meet demand.

Meeting the anticipated levels of demand will require a step change in the delivery of these forms of accommodation. It is for these reasons that the Consortium has come together and its submissions are made. An overly prescriptive, onerous or misguided policy environment will further stifle the Consortium's ability and that of other developers like it to deliver on the identified housing need where it is already a struggle to do so

Yours faithfully,

**A J Child
The Planning Bureau on behalf of the Retirement Housing Consortium**

Enc