

The Planning Bureau Limited

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Local Plan Team,
Place Directorate,
Waltham Forest Town Hall,
Fellowship Square,
Forest Road,
London,
E17 4JF

Via email: localplanconsultation@walthamforest.gov.uk 18th September 2023

Dear Sir / Madam

McCARTHY STONE RESPONSE TO THE LOCAL PLAN PART 1 MAIN MODIFICATIONS CONSULTATION

Thank you for the opportunity to comment on the Local Plan Part 1 Main Modifications Consultation. McCarthy Stone is the leading provider of specialist housing for older people in the UK.

MM40 and MM41

We support the deletion of MM40 and MM41 and the deletion of the policy on downsizing.

MM30

We note that 'Policy 13 - Delivering Genuinely Affordable Housing' requires specialist housing for older people to go through the Viability Tested Route in line with the London Plan and then be subject to a corresponding Review Mechanism. We also note that para 6.41 of the 'London Borough of Waltham Forest Part 1 Local Plan 2020-2025 (LP1) Viability Study, BNP Paribas, April 2021 states that *'The results of our appraisals testing older persons' accommodation demonstrate that the viability of retirement/sheltered housing and particularly Extra Care schemes in the Borough are challenging (see Appendix 10), except where schemes achieve higher sales values and come forward on sites with lower existing use values'*. Whilst we welcome that the Council have tested sheltered housing at the Local Plan making stage, in line with the PPG on viability, paragraphs 10-001-20190509, 10-002-20190509 and 10-004-20190509, given that older persons housing has been found to be challenging in terms of viability we feel that the older persons housing typology should have been given an exemption from the affordable housing requirements and the corresponding review mechanism in order to assist delivery, given the large need for older persons housing.

Waltham Forest is not exempt from needing older persons housing. However, the uncertainty and economic risk involved with review mechanisms brought in by the London Plan and its SPG in 2018 has resulted in providers of older persons housing, such as McCarthy Stone, being unable to commit the risk associated with sites in Greater London and therefore the VTR policy approach in the London Plan and corresponding Affordable Housing and Viability LPG is compromising sustainable development and undermining the deliverability contrary to advice within PPG on Viability. This lack of delivery of older persons housing can be shown by a simple search for planning application delivering older persons housing or retirement housing schemes across London which would show there have been very few over the last 5 years and a long way off the 4,112 annual requirement for London.

4th Floor, 100 Holdenhurst Road, Bournemouth, Dorset, BH8 8AQ

We ask that given the small size and single-phase delivery of the majority of the much-needed older person's housing schemes we recommend that flexibility is provided that exempts much needed specialist housing to meet the needs of older people from the complex review mechanism under the VTR route once viability has been assessed at the application stage. This would ensure that the plan is setting '*a level of requirement that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable*' in line with PPG Paragraph: 002 Reference ID: 10-002-20190509. If this flexibility is not provided there will continue to be a lack of delivery of specialist older persons housing within Greater London impacting on the health and wellbeing of Londoners. The flexibility could be provided to say specialist housing for older people under 100 units.

Thank you for the opportunity for comment.

Yours faithfully

N. Styles

Natasha Styles
Group Planning Associate