

Bexley Local Plan: EIP Technical Note

Action arising from Matter 4 – providing London Plan evidence of older persons specialist housing benchmarking and establishing the need in Bexley

HBF comments

We have considered the technical note provided by Bexley Council. This considers the two approaches to assessing the need for older persons housing – the GLA on one hand, and Bexley Council on the other. This is a helpful note and HBF appreciates the effort being made by the Council to support the supply of older persons housing through its new local plan even though we disagree on the quantum and type needed. HBF is keen for Bexley Council to adhere to the policy of the London Plan.

The two sources of evidence are:

1. Evidence to support the London Plan: Three Dragons GLA *Older Persons Housing Needs Assessment Report 2017* (OPHNA).
2. The Bexley 2021 SHMA (SD6) provides evidence of the need for specialist older person accommodation based on a combination of demographic modelling and a review of current older persons provision derived from Elderly Accommodation Counsel (EAC) data.

The London Plan requires Bexley to provide 145 units of generally C3 type specialist older persons (see supporting paragraphs 4.13.4 and 4.13.5 for a more detailed description of the types of housing this policy is trying to support). This is a 'benchmark' figure for each year for the period 2017 to 2029. It is not a prescriptive target, merely an aim. This contrasts to Bexley's local evidence that points to 81 units of both C2 and C3 types of accommodation.

Both approaches to assessing the need have their merits. However, as the HBF has argued at examination, because London is a single housing market area, the London Plan assesses the need for older persons C3 type accommodation on a London-wide basis, using a uniform method. Consequently, jettisoning this London-wide approach in favour of a local one would result in a mismatch in methods deployed across London for assessing the need for older persons housing of this type, resulting in the potential for an undersupply of older persons housing across London owing to local authorities adopting lower requirements or different mixes of types based on their own evidence. It is our view, that a single consistent approach needs to be followed across London as a whole, as with planning for housing. If each borough is allowed to adopt its own method to assessing housing need, including the need for older persons housing, then the effectiveness of cooperation across London for planning for housing is undermined.

Logically, if the Council considers that its local approach to assessing the need for older persons housing is more effective, then this argument would follow for planning for housing needs more generally. Bexley's SHMA 2020 indicates a level of housing need that far exceeds the London Plan figure of 685 dpa. As the report observes at paragraphs 5.34:

Having applied the standard method to the Borough, the level of household growth and affordability pressures results in a need for housing which ranges between 1,540 and 1,837 dwellings each year over the period 2020-2030 depending on the household projections being applied.

HBF has not argued that locally assessed housing requirements for Bexley's Local Plan should supplant the London Plan figure, and nor do we elsewhere in London. We support conformity with the housing requirements contained in London Plan because we consider that this is the most efficient way to plan for the needs of Greater London.

We note also that the Council uses a different timeframe for assessing need running to 2038, compared to the London Plan which is based on the period 2017-2029. This adds to the risk of inconsistencies.

The Council is at risk of conflating extra care housing and specialist older persons housing. As it states towards the bottom of page 2:

The 2021 SHMA identifies an annual need for 81 units over a longer time period to 2038 which is broken down to C2 and C3 use classes.

These are distinct in terms of how they are to be planned for by the London Plan. Extra care accommodation is addressed by Policy H12. Policy H13 of the London Plan relates to C3 type accommodation that does not provide “an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy.” (see paragraph 4.13.5 of the London Plan.

It may be necessary to quote the London Plan at greater length to illustrate the distinction. Supporting paragraph 4.13.4 to Policy H13 of the London Plan states:

“This policy contains requirements for ‘specialist older person housing’. It does not apply to accommodation that has the following attributes, which is considered ‘care home accommodation’:

- personal care and accommodation are provided together as a package with no clear separation between the two*
- the person using the service cannot choose to receive personal care from another provider*
- people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold*
- likely CQC-regulated activity will be ‘accommodation for persons who require nursing or personal care’*

Therefore, to ensure a consistent approach to planning for housing in London, reflecting the fact that London is a single housing market area, HBF would prefer Bexley Council to defer to the evidence of the GLA supporting the preparation of the London Plan and adopt the benchmark figure of 145 units of specialist older persons housing a year.

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