

# Local Plan

Topic Paper



## Specialist Housing

February 2020

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# 1 Introduction to Purpose Built Student Accommodation

- 1.1 This topic paper sets out the justification for Local Plan policy H6: Purpose-built student accommodation and Policy H7: Meeting the Needs of Vulnerable Older People.
- 1.2 It sets out the relevant existing local policy, and the London and national policy framework which guides the production of housing policies; and the key evidence base which supports the policies in the new Local Plan.
- 1.3 The topic paper then provides discussion on a number of specific policies/elements of policies, including links to evidence (where relevant) and comments on relevant representations received during previous rounds of consultation.

# 2 Policy framework for Purpose Built Student Accommodation

## National

- 2.1 The National Planning Policy Framework (NPPF) and related Planning Practice Guidance (PPG) sets out national planning policy in relation to housing. It is not a statutory document but it is a material consideration for plan making and decision-taking, and consistency with national policy is one of the ‘tests of soundness’ against which Local Plans are assessed<sup>1</sup>.
- 2.2 The NPPF highlights the importance of providing a sufficient amount and variety of land to significantly boost the supply of homes, and that the needs of groups with specific housing requirements are addressed<sup>2</sup>.
- 2.3 The NPPF<sup>3</sup> states that the size, type and tenure of housing needed for different groups should be assessed. This includes students although the NPPF does not specifically require purpose built student accommodation.
- 2.4 The NPPF<sup>4</sup> identifies that student accommodation is exempt from a minimum requirement for affordable home ownership of 10% on major housing development sites.
- 2.5 PPG provides further detail on assessing the need for student housing<sup>5</sup>.

*“Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.”*

- 2.6 PPG<sup>6</sup> also provides detail on how student accommodation should be counted towards meeting housing supply:

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<sup>1</sup> NPPF (February 2019), paragraph 35

<sup>2</sup> NPPF (February 2019), paragraph 59

<sup>3</sup> NPPF (February 2019), paragraph 61

<sup>4</sup> NPPF (February 2019), paragraph 64a

<sup>5</sup> Paragraph: 004 Reference ID: 67-004-20190722, <https://www.gov.uk/guidance/housing-needs-of-different-groups>

<sup>6</sup> Paragraph: 034 Reference ID: 68-034-20190722, <https://www.gov.uk/guidance/housing-supply-and-delivery>

*“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply based on:*

- the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
- the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

*This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student accommodation may be needed to replace a house which may have accommodated several students.*

*Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published census data, and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling.”*

## London

- 2.7 At the time of writing, the London Plan March 2016 (consolidated with alterations since 2011) is the adopted version. However, the Mayor is in the process of preparing a new London Plan. This has been subject to Examination in Public (EiP) including public hearing sessions. The Inspectors report was published in October 2019 and the Mayor has issued the ‘Intend to Publish’ version of the London Plan<sup>7</sup>.
- 2.8 This section of the topic paper only makes reference to the new London Plan given that it is likely to be adopted prior to the examination of Islington’s new Local Plan.
- 2.9 Policy H15 Part A of the London Plan states that boroughs should seek to ensure strategic and local need for purpose built student accommodation (PBSA) is addressed, dependent on meeting specific criteria including that PBSA contributes to mixed and inclusive communities; that use of accommodation is secured for students from one or more specified higher education institution via a nomination agreement; that 35% of the accommodation is secured as affordable student accommodation; and the accommodation provides adequate functional living space and layout.
- 2.10 Part B encourages boroughs and providers to locate in well-connected locations.
- 2.11 Paragraph 4.1.9 (part of the supporting text for policy H1: Increasing Housing Supply) states that non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio<sup>8</sup>, with two and a half bedrooms/units being counted as a single home. This aligns with the Housing Delivery Test.

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<sup>7</sup> The Mayor of London issued his ‘intend to publish’ version of the London Plan to the Secretary of State on 9 December <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

<sup>8</sup> It is noted that past student accommodation has counted on a 1:1 basis.

### Local adopted policy

- 2.12 The Core Strategy (adopted in 2011) recognised the importance of student accommodation in London but also the huge increase in the development of student halls of residence in Islington – at that time the council had exceeded its targets for student housing many times over. This provided a large number of student bedrooms and created potential for over-concentration of student accommodation. The Core Strategy raised the concern that it can threaten the attempt to achieve a more mixed and balanced and stable population. In addition, the Core Strategy recognised that land for housing and employment uses in Islington was in very short supply and made the delivery of these two uses the Council's absolute priority.
- 2.13 Core Strategy Policy CS12I therefore restricted the development of new student accommodation to two locations; the London Metropolitan University (LMU) campus area and specific City University London sites. These locations were also identified in Core Strategy policies CS4 and CS7. Policy CS4: Highbury Corner and Holloway Road identified the LMU campus as an area for the expansion of university uses and supported an element of student accommodation for LMU students.
- 2.14 Specific sites were designated in the Site Allocations and the Bunhill and Clerkenwell Area Action Plan DPDs adopted in 2013, in line with the locations identified in the Core Strategy;
- 2.15 Core Strategy Policy CS12J identified the affordability of accommodation while attending university as a major disincentive to lower income students with very high rent levels in new student accommodation identified. To address this the Core Strategy requires provision of bursaries for students leaving council care, to provide subsidised accommodation in order to enable disadvantaged Islington residents to continue their education. The approach is intended to widen access to education and help to tackle inequality deprivation, worklessness and social exclusion.
- 2.16 Further guidance on the level of contribution sought is set out in the Student Accommodation Contributions for Bursaries SPD, adopted in June 2013. The funding provided by the development is an annual payment equivalent to 2.4% of the total annual rental income from a development of student accommodation for thirty years or as long as the site is used for student accommodation, whichever is the shorter period of time. To date £544,355 has been collected by the Council.
- 2.17 The Development Management Policies (adopted in 2013) adds further detail to the Core Strategy policy. Policy DM3.9 sets out the requirement for an appropriate site management and maintenance plan and that PBSA should be occupied only by students (and where necessary only by students of a specified educational institution). Policy DM3.9 also has criteria to ensure a decent standard of accommodation and amenity for occupiers, and to prevent significant adverse amenity impacts on the surrounding neighbourhood. It specifically requires that 10% of bed spaces are designed to be wheelchair accessible, fully fitted from completion. The Inclusive Design in Islington SPD sets out additional design guidance for PBSA.

# 3 Background to Purpose Built Student Accommodation

## Need for student accommodation

3.1 Overall the SHMA considers student needs as part of general needs housing and doesn't quantify their needs which are considered transient. The Islington SHMA study notes that students don't qualify for welfare payments so wouldn't qualify for affordable housing. The 2017 London SHMA also considers student need as an element of overall housing need for London<sup>9</sup>. The Islington SHMA considers student numbers using the 2011 census which identified them as a proportion of the different types of households. Student numbers formed the smallest proportion of all household types at significantly less than 5% of total households<sup>10</sup>. They almost entirely resided in the private rented sector, representing 6% of the sector.<sup>11</sup> The SHMA also identifies that the number of student households in private rent decreased since the 2001 census<sup>12</sup>. As noted above the NPPF states that the size, type and tenure of housing needed for different groups should be assessed and includes reference to students although the NPPF does not specifically require the need for purpose built student accommodation to be identified. The PPG goes on to note that needs can be met through PBSA or conventional housing. The London Plan identifies in Part A that boroughs should ensure that strategic and local need is met provided that it contributes to mixed and inclusive communities. The London Plan identifies the overall strategic requirement for PBSA in London which was established through the work of the Mayor's Academic Forum as a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period<sup>13</sup>.

## Student accommodation delivery

3.2 The London Plan 2016 (consolidated with alterations since 2011) was informed by the work of the Mayor's Academic Forum<sup>14</sup>. This group was composed of representatives from the boroughs, universities, private and voluntary sector accommodation providers and students. It was chaired and serviced by the GLA. The forum initially ran from 2013 to 2014; it was then reconvened to discuss the implementation of London Plan 2016 policy on affordable student accommodation, and subsequently the development of new policy for the (then draft) new London Plan.

3.3 The Academic Forum Recommendations<sup>15</sup> noted the following key concern:

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<sup>9</sup> London SHMA 2017 para 8.15 to 8.19 [https://www.london.gov.uk/sites/default/files/london\\_shma\\_2017.pdf](https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf)

<sup>10</sup> Islington SHMA 2017 figure 73

<sup>11</sup> Islington SHMA 2017 para 3.48

<sup>12</sup> Islington SHMA 2017 para 7.17

<sup>13</sup> Student population projections and accommodation need for new London Plan (amended October 2018) [https://www.london.gov.uk/sites/default/files/student\\_population\\_projections\\_and\\_accommodation\\_need\\_for\\_new\\_london\\_plan\\_2017\\_amended\\_oct\\_2018.pdf](https://www.london.gov.uk/sites/default/files/student_population_projections_and_accommodation_need_for_new_london_plan_2017_amended_oct_2018.pdf)

<sup>14</sup> <https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/mayor%E2%80%99s-academic-forum>

<sup>15</sup> Paragraph 4.10, available here: <https://www.london.gov.uk/file/16242/download?token=lOgXKlgT>

*“a more fundamental concern among several boroughs that the ‘historic trend’ approach is no longer tenable in terms of land use. New student housing is no longer accommodated largely on sites considered unsuitable for conventional housing. Rentals for student accommodation, especially that let at £300/week or more, mean that it can compete with conventional housing for scarce land, even in central London and the scale of development in parts of this area is said to be putting pressure on land which boroughs wish to reserve for conventional housing.”*

- 3.4 Subsequent alterations to the London Plan addressed this concern. The London Plan 2016, in policy 3.8 and paragraph 3.53 recognises the conflict between PBSA and conventional dwellings

*“Addressing these demands should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. This may raise particular challenges locally, and especially in four central London boroughs<sup>16</sup> where 57% of provision for new student accommodation has been concentrated.”*

- 3.5 Paragraph 3.53A supports the dispersal of student accommodation to outer London or areas away from existing concentrations:

- 3.6 *“In addressing the need for specialist student housing, the Mayor will support proactive, partnership working by boroughs, universities, developers and other relevant bodies, including through his Academic Forum, to encourage a more dispersed distribution of future provision taking into account development and regeneration potential in accessible locations away from the areas of greatest concentration in central London.”*

- 3.7 Although the new London Plan does not explicitly refer to the dispersal approach, the evidence of the Academic Forum which informed the dispersal approach remains extremely relevant. Islington’s record of student accommodation delivery is significant.

- 3.8 The Academic Forum Recommendations<sup>17</sup> document provides student accommodation completion figures for various London Boroughs between 1999 and 2012. Islington’s delivery is the highest of all boroughs at 4,673 student bedrooms, which is approximately a fifth of the total student bedrooms completed across London in this period.

- 3.9 During the six-year period 2006/07 to 2011/12, there were 3,120 cumulative student bedroom completions, vastly exceeding the relevant NSC housing targets. In 2007/08 alone, over 1,000 units were completed.

- 3.10 As shown in Table 3.1, over the following six-year period, up to and including the latest AMR monitoring year (2017/18) a further 2,448 student bedrooms were completed. These included various completions from consents prior to adoption of the more restrictive approach in the Core Strategy and on sites allocated in the Site Allocations DPD.

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<sup>16</sup> The four boroughs referenced are Islington, Tower Hamlets, Southwark and Camden.

<sup>17</sup> Annex 2, Table 2, available here: <https://www.london.gov.uk/file/16242/download?token=lOgXKlgT>



**Table 3.1: Recent PBSA completion in Islington**

Year	Units Completed
2012/13	453
2013/14	350
2014/15	289
2015/16	475
2016/17	862
2017/18	-3

3.11 A further 257 units at the 295 Holloway Road site have been completed in the 2018/19 monitoring year<sup>18</sup>. There are however currently no further sites under construction, and no sites with planning consent or live applications under consideration. The Local Plan includes one allocation at 45 Hornsey Road, which is expected to contribute around 50 units/bedspaces (based on a 2.5:1 ratio). Of the five sites allocated in the adopted Local Plan (noted in section 2 above), 45 Hornsey Road is the only one that has not been realised and built out its allocation for student accommodation.

#### Cost of accommodation

3.12 The high cost of student accommodation, particularly PBSA, has significant implications for plan-making.

3.13 The NUS/Unipol Accommodation Costs Survey 2018<sup>19</sup> shows that average London rents were £210 per week for a private<sup>20</sup> en-suite and £169 for an institutional<sup>21</sup> en-suite in 2018/19. For a studio the study identified average rents in London to be £310 for private accommodation and £252 for institutional<sup>22</sup>. Compared to rental rates in the 2012/13 NUS/Unipol survey, these rates represent a 19% increase for private en-suite; a 23% increase for institutional en-suite; a 22% increase for a private studio and a 68% increase for an institutional studio.

3.14 The average identified from the collection of data from accommodation websites in Islington<sup>23</sup> shows that the average is higher than the London average at £351 in the borough. The data for Islington shows slightly higher increases over time, albeit over a slightly longer period<sup>24</sup>; increases ranged from 18% to 76% across the nine PBSA schemes analysed. This shows that weekly rents start higher than the London average and have increased at a faster rate than the London average.

3.15 Figure 3.2 below is taken from the report and demonstrates the rate of increase in rent and difference in rents between the capital and rest of country. The report also

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<sup>18</sup> Housing Trajectory 2019, Examination library reference: SD5

<sup>19</sup> Figure 6, available here: <https://www.unipol.org.uk/acs2018.aspx>

<sup>20</sup> Private means operated by a private provider, rather than a HE institution.

<sup>21</sup> Operated by a HE institution.

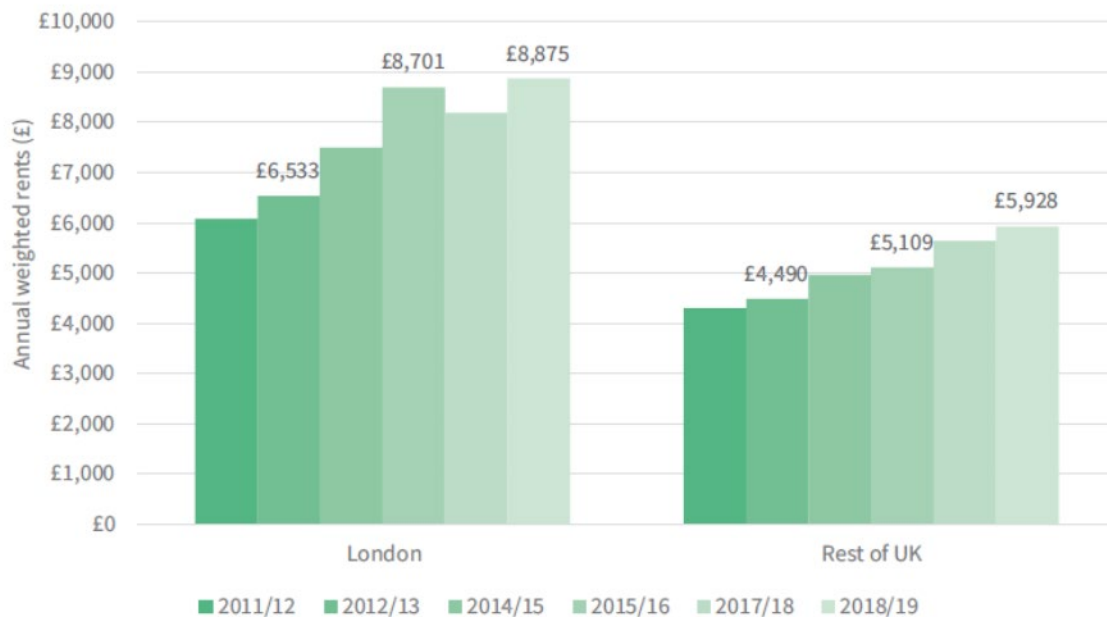
<sup>22</sup> Figure 9, available here: <https://www.unipol.org.uk/acs2018.aspx>

<sup>23</sup> Average of 2019 rents from nine PBSA developments within Islington completed between 2006/07 to 2009/10. See Appendix 1.

<sup>24</sup> 2009/10 to 2018/2019 compared to 2012/13 to 2018/19.

identifies that institutional increases in rent levels have been rising the fastest in London at 36% over the period compared to 23% for private providers.

Figure 3.2: Overall weighted annual rents: London vs rest of the UK, 2011/12 – 2018/19



- 3.16 The most recent additions to Islington’s student accommodation include iQ City on Bastwick Street, where an institutional en-suite is £240 per week and an institutional studio is £301 per week<sup>25</sup>; Stapleton House, where an institutional en-suite is £226 per week and an institutional studio is £275 per week<sup>26</sup>; and 295 Holloway Road (where the cheapest private ensuite is £275 and private studios range from £305 to £380<sup>27</sup>).
- 3.17 The Islington Strategic Housing Market Assessment (SHMA)<sup>28</sup> shows weekly rent levels for various sizes of property. This demonstrates that the rent levels for a student bedroom (based on the Islington average shown in Appendix 1) is higher than the market rent for a one bedroom flat and considerably more expensive than the rent level of various affordable housing tenures.
- 3.18 The overall average weekly rent outside London is two-thirds (68 per cent) of the average London level. The average annual rent for 2018/19 is £6,366, up 6% on the previous year and by a third on 2012/13. In London, the average is £8,875 and for the rest of the UK £5,928. The report identifies that one of the reasons for the above inflation rent increases is a shift from standard shared facilities stock to studio rooms, which are overwhelmingly provided in the private sector. The report goes on to say that studios are generally expensive and undermine aims to provide affordable accommodation, and that intervention by planning authorities is overdue with larger minimum size standards recommended alongside consideration that this type of accommodation is considered for alternative uses. The report identifies studio rooms as an investor driven commodity which make less efficient use of land.

<sup>25</sup> <https://www.city.ac.uk/accommodation/postgraduate/iq-city#tab=tab-2>

<sup>26</sup> <https://www.ucl.ac.uk/accommodation/ucl-halls/self-catered-accommodation/stapleton-house>

<sup>27</sup> <https://www.chapter-living.com/properties/highbury-ii>

<sup>28</sup> Islington SHMA 2017, Table 77

- 3.19 The NUS/Unipol report explains that London Plan policy has determined what an “affordable” rent for purpose-built accommodation is in London; this is no more than 55% of the maximum amount of student finance available for London<sup>29</sup>. Outside London the NUS defines affordable rent at 50% of the maximum amount of student finance available. The NUS recommends that providers should ensure that at least a quarter of their portfolio sits within this cap. Currently, of private providers surveyed in London, only 7% sit within this cap; universities, known as institutional accommodation as a whole meet this target. Overall, the change in rent levels has resulted in 2018/19 rents accounting for 73% of the maximum financial support on average.
- 3.20 Half of institutional respondents to the survey in London say they have an affordability policy and there is reference to providers taking steps to address this. Affordability was cited most often as the greatest challenge for the future.

### Student bursaries

- 3.21 Core Strategy Policy CS12 set out a requirement for student accommodation developments to provide funding for bursaries for students leaving Council care who are attending higher or further education. Further details were then provided in the DMP and the Student Accommodation Contributions for Bursaries SPD.
- 3.22 The justification for the CS bursaries policy was multifaceted, and this justification has strengthened in the period since the Core Strategy was adopted.
- 3.23 The 2019 Indices of Multiple Deprivation highlights a number of issues. Islington is the 28<sup>th</sup> most deprived local authority in England (out of 319). Over a fifth of LSOAs fall within the 20% most deprived LSOAs. 48% of children and 33% of older people are affected by income deprivation.
- 3.24 Islington has one of the highest rates<sup>30</sup> of looked after children<sup>31</sup> for a London borough. 26% of primary school pupils and 31% of secondary school pupils attending schools in the borough are in receipt of free school meals – around double the national average for each (14% and 12% respectively). The level of free school meals provision is a key indicator of deprivation, and coupled with the latest IMD data paints a stark picture in terms of child deprivation - nearly half of children resident in Islington and attending schools in the borough can be classed as deprived.
- 3.25 Deprivation has a significant impact on the educational experience and attainment of many children growing up in the UK. According to Department for Education (DfE) statistics, in 2013 37.9% of pupils who qualified for free school meals got five GCSEs, including English and mathematics at A\* to C, compared with 64.6% of pupils who did

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<sup>29</sup> Which in 2018/19 equates to £6,244.70 for students studying away from home in London.

<https://www.gov.uk/student-finance/new-fulltime-students>

<sup>30</sup> One of the highest rates per 10,000 children for a London borough. Islington has 82 children under age of 18 per 10,000 children using latest ONS mid-year statistics

<https://www.gov.uk/government/statistics/children-looked-after-in-england-including-adoption-2017-to-2018>

<sup>31</sup> These are children who are looked after by the local authority either because their parents/carers are unable to care for them, they have been abused or neglected and/or are unaccompanied asylum seekers [http://www.islingtonscb.org.uk/key-practice-guidance/Pages/Children-looked-after-\(CLA\).aspx](http://www.islingtonscb.org.uk/key-practice-guidance/Pages/Children-looked-after-(CLA).aspx)

not qualify. Child poverty is a factor affecting educational attainment with a current upward trend<sup>32</sup> in children living in poverty across the country - compared to the overall population, children remain more likely to be in low income households, also London has the highest rate of child poverty in the country<sup>33</sup>. Research identifies that whilst there is a strong association between poverty and low educational attainment there are other factors which also contribute; sometimes referred to as cultural, social and economic capital. One aspect of this, social capital is particularly relevant to care leavers. Social capital relates to the relationships between people in families, schools and communities. Care leavers are potentially more deficient in this form of capital with problems within families and communities more common meaning that schools serving deprived communities often deal with extra challenges including discipline and welfare issues<sup>34</sup>.

- 3.26 To date £544,355 has been collected by the Council via the adopted Core Strategy policy, with a further £230,849 due to be collected soon from a recently completed student accommodation development; £357,515 of this has been spent to date by the Council's Children, Employment and Skills department. The funding has contributed to a number of initiatives (detailed below).
- 3.27 Islington Councils Independent Futures provides the service to young people who have been looked after by Islington aged 16- 21 who are in the process of making the transition from the care system to independent living.
- 3.28 The Council is responsible for children which have been in its care up to the age of 25. The term 'care leavers' refers to the young adults whom the Council has been responsible for when they were children either in foster care, residential care or some other arrangement. These children have to leave care at some point and the Council has a duty to maintain some form of support for these young adults, similar to the support young adults would get who live with families. Whilst the Government provides a minimum financial support to young adults, this does not equate to the support parents would usually provide their children. As well as advice and support given by the Council Young Person Advisors, there is financial support also available from the Council.
- The following are the various financial tools the Council uses to help support care leavers become independent by continuing their education and development: A Learning Agreement Allowance can be given to care leavers where they are engaged in an agreed programme of education or training which helps to encourage young people to continue in education, up to a maximum £30/week.
  - Up to £150 per year for books, materials, equipment or registration fees or for trips for young people in further education, training or school

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<sup>32</sup> Department for Work and Pensions. Households Below Average Income: An analysis of the UK income distribution: 1994/95-2017/18. See page 8 main findings [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/789997/households-below-average-income-1994-1995-2017-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/789997/households-below-average-income-1994-1995-2017-2018.pdf)

<sup>33</sup> Child Poverty Action Group and <http://www.endchildpoverty.org.uk/poverty-in-your-area-2019/>

<sup>34</sup> Page 5 Roxanne Connelly, Alice Sullivan and John Jerrim (2014), Primary and secondary education and poverty review, London: Centre for Longitudinal Studies. <https://cls.ucl.ac.uk/wp-content/uploads/2017/02/CONNELLY-R-SULLIVAN-A-and-JERRIM-J-2014-Primary-and-secondary-education-and-poverty-review.pdf>

- There is a Higher Education Fund – a bursary, which is for young people studying that is not a degree course which is worth £2,000 and subject to confirmation of attendance
- Support for public transport costs when travelling to school, training or college when these costs are not covered by free student travel in London

### 3.29 Care leavers who go to university get the following support:

- A Higher Education Support Grant is available for care leavers as a contribution towards learning. A total £3,000 per annum is available in addition to the usual students loans (£1,000 per term) and help is provided to ensure that a care leaver accesses and receives all the right fees, maintenance loans and applies for the right bursaries.
- The Council also has a duty to provide accommodation during the university holidays -equivalent to 12 weeks. Generally care leavers don't go to University in London as it is too expensive.
- For accommodation at University care leavers get priority in halls of residence and the Council provides a bursary. Usually care leavers go to University later than other children.
- There are about 40 Islington care leavers currently in higher education, the Council would like to get to 60/70 care leavers in higher education.

### 3.30 There are also other funds available to support young people such as :

- For 16/17 year olds they can access £480/year for clothing.
- For 18 to 21 year olds there is a care leavers fund of up to £200 per annum to help celebrate a birthday or hobby or go on holiday. 16/17 year old care leavers can get £300
- Cost for interviews such as clothing/travel, up to £100 per annum

### 3.31 In terms of the qualitative impact of these schemes, which can operate to the degree they do because of the bursary contributions, the following case studies demonstrate the positive impacts for care leavers who have been supported by the Independent Futures service

- Nathan is a young man who has been in the care of the local authority for several years. He maintained a good relationship with his foster carer and showed great academic potential. As a result of achieving academic excellence, Nathan has been supported to attend a very prestigious University. He is able to follow his desires through being supported with a top up bursary and is supported to stay with his foster carer when he is back in London. Without the additional support from the local authority, he may not have been able to fulfil his potential.
- David and his twin sister Diane came into the care of the local authority just before their 18<sup>th</sup> birthday when the relationship with their mother broke down. David continued to achieve very well academically despite the challenges at home. He achieved top grades and went on to study at a prestigious university. His twin sister, though also very academically able, was not able to focus on academic study at the time but continued to maintain some employment and education. She

was supported to move into her own accommodation. Two years later, she is now ready to begin her first year of University study, which she will be doing in October 2019. Through all the options described above, David and Diane have been supported to financially remain as a family unit despite the breakdown in relationship with their parents. They are a strong support for each other and maintain a high level of contact with David staying with his sister whenever he is in London. David is now in the final year of his course and doing very well.

- Matteo is a former unaccompanied asylum seeking child who came to the UK from Albania. Matteo came to the UK aged 15. He quickly learned English and took a great interest in academic study- he had a strong interest in sciences and was offered a place at a prestigious university to study dentistry. His asylum decision is still not yet made by the Home Office, but because of his academic excellence, he was awarded a scholarship to study if the local authority could cover his accommodation costs for the duration of his course or if he obtains residence before that moment. Without the availability of the funds described above, Matteo would not have been able to fulfil his dream to be a dentist. He is now in his second year of academic study and is doing very well.

# 4 Discussion for Purpose Built Student Accommodation

- 4.1 The rationale for Policy H6 is based on historic delivery of PBSA, the unsustainable built form, and the significant need to deliver higher priority land uses in the borough; namely conventional housing and employment use. There is also concern nationally, but particularly in London, around affordability for renting the new student accommodation.
- 4.2 Islington's universities are an important part of the borough's success and contribute to its economic and social diversity. However, the increased demand for student housing throughout the 2000's and following the recession in the late 2000s resulted in a deluge of PBSA development (at the highest rate of any London borough). The Council subsequently adopted a restrictive policy to control the development of PBSA and protect land for meeting other needs.
- 4.3 The Local Plan makes clear in paragraph 3.14:
- 4.4 'Islington faces an extreme set of circumstances when it comes to need and land supply. Land supply in Islington is constrained, and the borough is small and densely populated. Local evidence demonstrates that the need for new housing in the borough is significant, particularly the need for genuinely affordable housing. The borough faces an acute affordability issue which means that a simple 'supply and demand' model of housing delivery will not address the needs of our growing population. In this context land supply for conventional housing and genuinely affordable housing are considered the top priority because they are the most sustainable use of land in Islington, as they meet a broad range of housing needs.'
- 4.5 As set out in the background section Islington has delivered a significant supply of PBSA between 1999 and 2012. Delivery is the highest of all London boroughs at 4,673 student bedrooms, which is approximately a fifth of the total student bedrooms completed across London in this period. During the six-year period 2006/07 to 2011/12, there were 3,120 cumulative student bedroom completions, vastly exceeding the relevant NSC housing targets. In 2007/08 alone, over 1,000 units were completed. This supply was built to the detriment of other priority land uses – principally residential and the borough was therefore failing to meet wider housing needs.
- 4.6 To address this, policy was introduced in the Core Strategy in 2011 to restrict student accommodation to specific sites. The opportunities presented by the site allocations have now been taken up and have delivered further significant supply of PBSA in the borough in the current plan period to 2018/19.
- 4.7 The extreme set of circumstances which now face the borough mean that the restrictive approach set out in the Core Strategy retains merit and needs to be continued therefore new PBSA will only be supported in one location – a site which lends itself to some form of PBSA.

- 4.8 The site allocation NH10 is adjacent to the London Metropolitan University, yet is distant enough from existing PBSA to retain a local mix and balance to the community. The site is confined, and considered to have little ability to provide amenity space. The allocation notes the proximity to the railway and Holloway Road and considers that accommodation should address and mitigate noise and air quality issues. The allocation also identifies an opportunity for the development of a local landmark building of up to a height of 12 storeys (37m). The site is considered suitable for development for conventional housing as well as student accommodation.
- 4.9 The Local Plan promotes a circular economy approach to development in order to save resources, improve resource efficiency and help improve carbon emissions. Keeping a building in use for as long as possible to ensure resource efficiency is an important principle of this policy and ensuring that buildings are designed and constructed in a way that can be adapted and deconstructed is part of delivering this principle. The design and form of student accommodation is not considered flexible and adaptable for alternative uses for the following reasons:
- Internal room sizes do not meet minimum residential space standards, bedspaces in cluster flats can be as low as 11sqm. Ceiling heights only meet minimum building control standards and not higher standards for conventional housing and bedspaces are always single aspect. There is no mix of unit sizes with flats either built as single bed units in cluster flats or studio units.
  - No private outdoor amenity space is provided, sometimes communal outdoor space is provided but not to the same standard as would be for conventional residential accommodation.
  - The location and orientation of PBSA can be less than adequate in terms of privacy, overlooking and daylighting. A recent appeal in Cardiff highlighted the issue of overlooking between facing windows in a case where existing PBSA was being considered for conversion to conventional residential.<sup>35</sup> The gap was 16.5m between the windows in the two wings overlooking an internal courtyard – in Cardiff the Local Plan standard is 21m between facing habitable rooms windows. Islington applies a standard of 18 metres between facing habitable windows for conventional residential accommodation. The same appeal also identifies a lack of amenity space.
- 4.10 Overall PBSA provides inferior living conditions compared to conventional housing. A radical conversion to conventional housing may be possible by stripping a building back to its frame to address unit mix and sizes but this may not be able to address more fundamental issues of privacy, overlooking and outdoor amenity space.
- 4.11 The alternative uses to which PBSA may be readily converted are large scale HMO and visitor accommodation. However neither land use are supported by policy for similar reasons to PBSA – they meet a narrow and defined need. Employment use would require significant renovation internally although issues of privacy, overlooking and daylighting would not be relevant. Therefore PBSA is not considered a sustainable use of land; the accommodation is inflexible and built to lower standards which is only capable of meeting a narrow and defined need and not the priority need for conventional and affordable housing in the borough.

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<sup>35</sup>Paragraphs 7 and 8 Appeal Decision APP/Z6815/A/19/3234583



## **REPRESENTATIONS**

### London Metropolitan University (Local Plan consultation reference R19.0176)

- 4.12 The response objected to the omission of student accommodation for both NH13: 166-220 Holloway Road, N7 and NH14: 236-250 Holloway Road, N7 6PP and 29 Hornsey Road, N7 7DD. These sites are included as one allocation in the existing adopted Local Plan Site Allocations. The London Metropolitan University (LMU) response was summarised in the Consultation Statement as follows:
- 4.13 'It appears illogical to prohibit London Met from meeting its needs for student accommodation on its own site where surplus space exists, while permitting student accommodation on a neighbouring site. A private development on this site would not be able to offer the support and pastoral care which is critical to ensuring successful learning outcomes, quality of life and in safeguarding students' mental health. LMU note that student accommodation is an integral element to the delivery of their estates strategy and OCOC project and note masterplan work that will be prepared. The approach taken by the council is inconsistent with the London Plan policy H17. The University notes the reference in NH14 that development should provide active frontages along Holloway Road and will be expected to contribute to improving the public realm, particularly the poor physical environment along Holloway Road and Hornsey Road. The current master planning exercise will address this.'
- 4.14 The Council notes that adopted allocation HC3 identifies that for LMU sites (A, B and C collectively), an element of student accommodation may be included. Site C has now delivered close to 900 student bedspaces, which clearly constitutes more than an element allowed across the A, B and C sites as set out in the site allocations. In addition site D has also delivered a further 257 so over 1,100 bedspaces have been delivered immediately adjacent to LMU. The council has retained the remaining adopted student accommodation allocation (NH15, previously site E part of allocation HC3) but we consider that further allocations would undermine the objectives of the plan. We note that the London Plan requires PBSA to secure nomination agreements with HE providers, meaning that NH15 could be utilised as provision for LMU.
- 4.15 To add further detail from the LMU response it was explained that the University released the land at 263 – 269 Holloway Road because they required finances to improve the main teaching campus. The following was stated:
- 4.16 "The University has already reduced its physical footprint with the redevelopment of its former premises at 263-269 Holloway Road for student accommodation following the consent in 2014. This site has now been sold and developed by UNITE to provide some 856 student bedrooms. When this application was made it was explained that the University's Estates Strategy had identified that the estate should be reduced from 111,154m<sup>2</sup> to 85,489m<sup>2</sup>, equating to a figure of 4.8m<sup>2</sup> per student FTE compared with the figure at the time of 6.6m<sup>2</sup> per student FTE. The disposal to UNITE was essential at that time to provide capital receipts that could be invested back in to the main teaching campus at 166-220 Holloway Road. Index House had been vacant for 20 years and other parts of the site were about to be vacated by LMU as it consolidated its teaching facilities."
- 4.17 Index House has been vacant for 20 years which suggests a lack of long-term planning by the University. In addition there is no agreement with Unite over use of any of the accommodation or the level of affordability at Stapleton House – which as landowner and HE provider located next door, the University could have negotiated –

currently bedspaces at Stapleton House are being advertised for UCL. Given the knowledge the University already had in respect of feedback about the lack of University run accommodation this seems surprising. The University response also makes clear that the University had to sell its own accommodation of 811 bedrooms around Holloway Road and Kentish Town for financial reasons between 2006-10. In light of this history, the Council is not clear why further PBSA should be allocated in order to address continuing financial mismanagement on the University's part. The Local Plan is a strategic land use plan and should not be addressing deficiencies in a specific landowner's estate mis-management. LMU have already passed over the opportunity to develop PBSA previously or at least negotiate nomination rights as well as selling its own stock. Moreover, the opportunity to provide student accommodation has now been exhausted with the element of student accommodation allocated in the existing Local Plan already completed both at Stapleton House and 295 Holloway Road which has delivered over 1,100 bedspaces. The existing concentration of student accommodation needs to be considered to ensure mixed and inclusive communities.

- 4.18 There is an opportunity for the University to work with the landowners at 45 Hornsey Road which is allocated for student accommodation and adjacent to LMU owned land. The allocation is based on a legacy decision for that site where location of student accommodation was considered acceptable by a Planning Inspector at appeal. It is therefore considered that this site will help the borough meet local need for student accommodation.

Unite (Local Plan consultation reference R19.0074)

- 4.19 The Unite group made a response which objected on various grounds to the lack of policy flexibility and restrictive approach to provision of student accommodation, the wheelchair requirement, the use of bursaries, the restriction over use of accommodation for short term accommodation and the requirement for 35% affordable rent student accommodation.
- 4.20 The Unite group made an objection asking that the Council take a more flexible approach to PBSA and in doing so, consider the projected increases in student numbers. The response references the London Plan support for student housing on suitable locations and states that 170,000 students are currently living in conventional housing in London.
- 4.21 The Council response in the Consultation Report September 2019 makes clear that the Draft Local Plan limits the development of student accommodation to certain locations. Significant student accommodation has been delivered over 10-15 years and there is a greater need to prioritise conventional housing and employment growth. Delivery has been significant in inner London. Just over 5,500 student bedspaces have been provided in the last 12 years in Islington, over last 7 years, Camden have provided 3,300 units and in Southwark 2,200 units have been provided in last 5 years.
- 4.22 The SHLAA identified that 9,880 PBSA bedrooms would be delivered during the 10 year London Plan period and that 37% of these are in inner London. This capacity identified in the SHLAA is going to be for sites which have existing planning approvals or allocations for student housing and sites where boroughs have identified student accommodation as appropriate given specific location/setting reasons. But many of the sites identified in the SHLAA as capacity for conventional housing may also deliver student accommodation – an issue identified by boroughs. Based on current delivery

identified in the latest GLA AMR for the previous three years actual delivery has comfortably exceeded strategic need for each year - the London Plan identifies a strategic need of 3,500 bed space per annum over the 10 year London Plan period. The current GLA AMR 15 for 2017/18 shows non-self-contained completions at 2,476 units, with 388 completions in Inner London and 4,000 units approved in the monitoring year.

- 4.23 Student accommodation is a less optimal use of land than conventional housing, which can manage the same, if not greater delivery levels but with the benefit of meeting a broader range of needs. The Mayor considers student accommodation meets less housing need with net non-self-contained accommodation for students counting towards housing targets on the basis of a 2.5:1 ratio, with two and a half NSC bedrooms/units being counted as a single home. Islington faces an extreme set of circumstances when it comes to development needs and land supply. Land supply in Islington is constrained, and the borough is small and densely populated. Local evidence demonstrates that the need for new housing in the borough is significant, particularly the need for genuinely affordable housing. The borough faces an acute affordability issue which means that a simple 'supply and demand' model of housing delivery will not address the needs of our growing population. In this context land supply for conventional housing and genuinely affordable housing are considered the top priority because they are the most sustainable use of land in Islington, as they meet a broad range of housing needs.

#### Viability

- 4.24 As part of the evidence base for the Local Plan the effect on development viability in Islington to accommodate the emerging policies in the Draft Local Plan alongside amounts of Community Infrastructure Levy ('CIL') in the Council's adopted Charging Schedule has been tested. The draft Local Plan Viability<sup>36</sup> study takes account of the cumulative impact of the Council's planning requirements, in line with the requirements of the National Planning Policy Framework ('NPPF').
- 4.25 Two aspects of the draft policy will impact upon development viability; the 35% requirement for affordable student accommodation and the bursary payment of 2.4% of annual gross rent for a 30 year period.
- 4.26 The study methodology compares the residual land values of a range of developments and development typologies reflecting the types of developments expected to come forward in the borough over the life of the new Local Plan. The appraisals compare the residual land values generated by those developments (with varying levels of affordable housing and other policy requirements) to a benchmark land value to reflect the existing value of each site prior to redevelopment plus a premium for the landowner. If a development incorporating the Council's emerging policy requirements generates a higher residual land value than the benchmark land value, then it can be judged that the site is viable and deliverable. The Draft Local Plan Viability Study modelled a student accommodation 'typology' (simply referred to in the report as a 'scheme') in the study.

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<sup>36</sup> <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicnotices/20182019/20181219islingtondraftlocalplanviabilitystudydecember2018.pdf?la=en&hash=AD50406978EC98CE3D98D92057AA500333CB0275>

- 4.27 The appraisal of the student accommodation scheme tested the impact of (draft) London Plan policy H17A4 which requires that 35% of student accommodation units should be provided at affordable rent levels, as well as the policy requirement to provide a bursary payment equating to 2.4% of the annual gross rent (rent per annum) for a 30 year period – the viability testing found that both of these policies could be viably provided. The appraisals also included all the other required planning obligations (carbon offsetting, E&T (end user training), E&T (placements), Code of construction practice etc. as well as CIL.
- 4.28 It is notable that the student accommodation scheme is viable at 35% affordable rent levels and also with a bursary payment of 5% of annual gross rent (rent per annum) for a 30 year period.
- 4.29 It is important to note that the policy requirement for 10% of student accommodation to be wheelchair accessible would only have a marginal impact upon the obtainable scheme revenue (Gross Development Value) – the impact of the policy would be a marginal depreciation to the revenue side of the equation (through a slight reduction in scheme efficiency due to 10% of the development being larger wheelchair accessible units). As demonstrated by the Council's Draft Local Plan Viability Study (December 2018), the high development values associated with student accommodation schemes would allow for the policy requiring 10% of units to be wheelchair accessible to be viably delivered whilst also meeting other policy objectives.

#### Student bursaries

- 4.30 The student bursaries contribution is aimed at enabling disadvantaged Islington residents continue their education. This helps some local young people take a step towards improving their employment potential, tackling poverty and worklessness in the long term, including inter-generational worklessness. As set out in the background section the Indices of Multiple Deprivation identify the borough as one of the top 30 most deprived boroughs nationwide with nearly 50% of children affected by income deprivation. In addition, Islington has one of the highest rates of looked after children for a London borough.
- 4.31 Child poverty is a factor affecting educational attainment with research indicating the strong association between poverty and low educational attainment. Other wider social and cultural factors also contribute which may in particular affect children in care and care leavers potential for educational attainment. The policy approach to bursaries is aimed at addressing this by helping increase access to higher and further education and tackle worklessness by providing funding for bursaries for students leaving Council care and other Islington students facing hardship who are attending a higher or further education establishment.
- 4.32 LMU object and consider the requirements are too simplistic an approach and reference where a proposal may come forward from a higher education provider when they might want to provide affordable accommodation for their own students which might be rendered unviable therefore defeating the purpose of the policy. This however is not the case, and the policy as drafted is clear that in such cases, viability is considered and the level of affordable student accommodation must be the

maximum viable amount with the Council making clear that other aspects of the policy should not be affected – bursaries take precedent.

4.33 Unite argue that there is no valid planning policy reason for seeking the provision of bursaries as part of new PBSA. As set out in the background the basis for the bursary approach in policy is rooted in the socio-economic profile of the borough. The vision for the Local Plan is:

- To make Islington fairer and create a place where everyone, whatever their background, has the same opportunity to reach their potential and enjoy a good quality of life.

4.34 This is supported by an objective in the Local Plan which seeks that children and young people get the best start in life, and are enabled to achieve their full potential. The background section makes clear deprivation remains an issue in the borough with young people disadvantaged compared to other parts of London and the rest of the country. The requirement for student accommodation schemes to fund student bursaries is aimed at enabling disadvantaged young people to continue their education. As set out in the evidence section the cost of new PBSA accommodation is beyond the means of Islington's most deprived young people and represent a real barrier to them accessing education and realising their potential.

4.35 The requirement for student accommodation schemes to fund student bursaries is aimed at enabling disadvantaged young people continue their education. This helps them take a step towards improving their employment potential, tackling poverty and the high level of worklessness in the long term. The funds to date have helped support a significant number of Islington young people to continue their education. As set out in the background section the Council is responsible for children which have been in its care up to the age of 25. These children have to leave care at some point and the Council has a duty to maintain some form of support for these young adults, similar to the support young adults would get who live with families. Whilst the Government provides a minimum financial support to young adults this does not equate to the support parents would usually provide their children and the Council therefore provides some degree of extra support, in part funded through bursary contributions which helps to support some young adults into further study.

4.36 The policy is implemented via a s106 planning obligations which is required to comply with the test set out in CIL regulations. The bursary approach accords with these three tests since:

- a. The obligation is necessary in planning terms to make the development acceptable as discussed above. Without the obligation new student accommodation, could potentially exacerbate social inequality in Islington. That is to say new student accommodation would not only take the place of a potential affordable housing site but the cost of the student accommodation provided would be beyond reach of many of Islington's students surrounding such a development. This would be particularly the case for students coming from the council's care.
- b. The obligation payments directly relate to the student bedroom rents on the development.
- c. The obligation is in kind and scale which is fairly and reasonably related to the development. The bursary payment is a small percentage of the rent level charged for the student bedrooms in the development, and thus is related in scale as

set out in SPD. The detail set out in paragraph 3.26 identifies the amount developers have already agreed and paid, which indicates they accepted such an obligation is fair and reasonable in scale and kind.

#### Affordable student accommodation

- 4.37 The Mayor has introduced the policy requirement for affordable student accommodation seeking at least 35% in line with the fast track affordable housing route. The Local Plan has included this in policy with the proviso that it does not affect bursary contributions, and where it does bursary contributions take priority.
- 4.38 Unite object to the inclusion of a policy seeking 35% affordable rent stating there is no evidence that this level of provision can be secured across London. The evidence set out in the Local Plan viability study makes clear that a PBSA scheme would be viable in Islington with all the policy commitments the Council requires. The viability testing found that both of the policy requirements for affordable accommodation and bursaries could be viably provided<sup>37</sup>. Unite do not provide any justification on viability grounds that this cannot be achieved in the borough.
- 4.39 The Mayor welcomes Islington's requirement that 35% of new student accommodation is to be affordable and observes that achieving this will ensure the threshold for the fast track route is met in accordance with the latest consolidated version of new London Plan Policy. The Mayor goes on to say that boroughs are encouraged to maximise the delivery of affordable student accommodation and Islington should recognise that this might be jeopardised through the prioritisation of bursaries over and above affordable accommodation.
- 4.40 The Council considers that student bursaries make a more meaningful local impact to addressing the extreme inequality in Islington, long term worklessness and other factors as the reason why they are a priority over provision of affordable student accommodation. With the contribution aimed at enabling disadvantaged Islington residents continue their education this helps some local young people take a step towards improving their employment potential and tackles poverty and worklessness in the long term. As set out in the background section the Indices of Multiple Deprivation identify the borough as one of the top 30 most deprived boroughs nationwide with nearly 50% of children affected by income deprivation. In addition, Islington has one of the highest rates of looked after children for a London borough. It is also worth reiterating that the council's evidence demonstrates that it is viable to deliver both the student bursaries contributions and the affordable student accommodation required by the London Plan. It is therefore highly unlikely that the bursaries requirement will jeopardise the affordable accommodation requirement as per the London Plan.
- 4.41 The response from London Metropolitan University makes the point that 75% of the students enrolled at the University come from Greater London, therefore it is assumed student accommodation and affordable student accommodation is less likely to be used by young people who already live in Islington or even London as a whole. They are more likely to remain in their current accommodation than take up more expensive student accommodation which is also not available all year round so whilst positive, affordable student accommodation is less likely to meet much local need for affordable accommodation.

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<sup>37</sup> Local Plan Viability Study page 4 of summary

## Use as short term visitor accommodation

- 4.42 The Council is opposed to the short term use of visitor accommodation for two reasons; amenity impacts and issue of housing supply. The Council has clarified its position on use of student accommodation with detail in paragraph 3.105 which sets out the basis for using PBSA for ancillary purposes for example conference delegates, interns on university placements, and students on short-term education courses.
- 4.43 The London Metropolitan university response highlights the restriction, making a case that the bedspace would be 'wasted' as a valuable source of income for Universities. It is also stated that amenity impacts on long term students can be mitigated through management plans. The response adds that if their representation is not accepted then prohibition of use as visitor accommodation should not include letting to other academic institutions.
- 4.44 The Unite response highlights the restriction, making a link with the levels of Air BnB accommodation use already occurring in conventional housing in the borough and considers using PBSA as short term visitor accommodation has a positive effect on supply of housing by reducing demand for Air BnB accommodation. The response identifies that supply of Air BnB is unmanaged implying that permitting PBSA to be let out as short term visitor accommodation would ease the amount of Air BnB in the borough. This is not supported by any evidence in Unite's response.
- 4.45 Given the limited time PBSA would be available for holiday lettings it would seem unlikely that it would affect long term decisions from property owners of conventional housing around the availability of their property for rent on AirBnB. In any case, given how lucrative short term letting is, property owners of conventional housing would pursue their commercial interest regardless.
- 4.46 Housing supply relates to the principle that student accommodation makes a contribution, albeit less effective than conventional housing. The Mayor already considers student accommodation meets less housing need with net non-self-contained accommodation for students counting towards housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Use as visitor accommodation, albeit temporary, further dilutes this less efficient use of land so affects supply of housing further.
- 4.47 Student accommodation can be booked relatively flexibly for anything from one semester up to the 40 or 42 week academic year and in some instances up to 51 weeks. The potential for use of accommodation for visitor use is potentially more lucrative. Using the standard 42 week academic year would result in 9 extra weeks being available for visitor accommodation. Nine weeks let as student accommodation at £350 per week would return £3,150 for a single bedspace. A standard room at a budget hotel in Islington for one nights stay would cost £100<sup>38</sup>. Based on 50% occupancy for a nine week stay would return £3,200. Any additional visitor nights above this 50% occupancy would therefore provide a significant additional income to the operator. This could lead to a more transient student population with students encouraged or even not given the option to rent for longer periods than the standard

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<sup>38</sup> Premier Inn London Angel Hotel <https://www.premierinn.com/gb/en/hotels/england/greater-london/london/london-angel-islington.html>

academic year. These students may then be forced to seek short term rental accommodation in conventional housing.

- 4.48 Amenity impacts on safety, security and privacy are an important consideration. Existing students who are living and studying in student accommodation should be able to expect a reasonable standard of welfare and be able to live, study and socialise with their peers in a safe and secure environment. Introducing visitor accommodation can impact on this environment by introducing a significantly more transient population with more arrivals and departures, less knowledge for existing residents about who is staying in neighbouring rooms and an increasingly public and busier entrance to the accommodation where members of the general public are more able to access the accommodation without challenge. In particular the more public entrance can potentially lead to safety issues by increasing the opportunity for anti-social and criminal behaviour. Introducing a potentially much more diverse group of visitors will also impact on privacy of existing residents reducing their ability to enjoy existing communal facilities with their peers with potential visitors also potentially able to use communal facilities. Increased comings and goings typically associated with visitor accommodation will also have noise impacts on amenity of existing residents.
- 4.49 A management plan may be able to mitigate some of these impacts to a degree by limiting visitor accommodation to certain floors of a building and controlling doors by card keys for example. However restricting the access more generally to the building for members of the public is unlikely with accommodation usually built with one entrance therefore the issue of safety and security will always be a compromise to a degree. In order to provide some flexibility the council has amended its policy to allow use of accommodation for similar educational users ie for conference delegates, interns on university placements, and students on short-term education courses. These users are considered more akin to students already in occupation.

#### Wheelchair Accessible requirement

- 4.50 Unite object to the 10% requirement for wheelchair accommodation for conventional accommodation being applied to student housing. Unite consider that there is no evidence that 10% of bedspaces in PBSA should be wheelchair accessible. They justify their objection to this policy requirement based on their experience stating that only 0.5% of their London portfolio is occupied by wheelchair users, providing evidence in the form of data from HESA 2017 London and Disability data. They do not consider that conventional housing standards should be applied to student accommodation and consider it an inefficient use of land as fewer standard units are provided. They also refute the fact that the target is making up for a lack of accessible accommodation in private sector stock relating this to the age of the occupants.
- 4.51 Currently mobility impaired students have very little choice of accommodation. The council considers demand for accessible student housing to be one of unmet need and unfulfilled potential. Historically, disabled children have been unable to access mainstream education and so have not obtained the results or dared to cherish the aspirations, common among their peers. It is a fact that:



- disabled people are around twice as likely not to hold any qualifications compared to non-disabled people, and around half as likely to hold a degree-level qualification;
- 20% of working age disabled people do not hold any formal qualification, compared to seven per cent of working age non-disabled people; and
- 14.5% of working age disabled people hold degree-level qualifications compared to 26.8 per cent of working age non-disabled people.

4.52 In Islington, 3.3% of the population claims a disability living allowance (8,710 claimants in 2017<sup>39</sup>), and 15.9% of people claim Attendance Allowance<sup>40</sup> – which is payable to people over the age of 65 who are severely disabled, physically, mentally, or terminally ill, and need a great deal of help with personal care or supervision. The Disability Living Allowance is payable to children and adults in or out of work who are below the age of 65 and who are disabled, need help with personal care or have walking difficulties.

4.53 In addition to benefit claims, as of 2017, there was an estimated 30,600 people in Islington reporting disabilities such as mobility, dexterity and memory loss. These figures are based on a surveyed prevalence of 13% in an inner London Borough<sup>41</sup> 19% of working age adults have a disability<sup>42</sup> and 51% of disabled people have a mobility impairment<sup>43</sup>. These figures for the wider population are included here as indicative of the wider levels of disability in society and form the basis for the wider policy requirement for M4(3) dwellings.

4.54 It is a fact that low numbers of disabled students currently occupy existing accommodation. However, this should not be accepted as evidence of low demand, given the difficulties many disabled students and would-be student face accessing the system or that may cause them to drop out of university. These difficulties were highlighted in a survey undertaken by Trailblazers (c/o MDC) and include:

- sixty percent said there was not enough information for disabled students on university websites regarding accommodation
- thirty percent felt limited in where they could choose to study owing to concerns over their care packages
- three out of four said organising care from their local authority was NOT straightforward to organise
- ninety percent said their disability advisors were helpful
- ninety percent said their university made adjustments to improve access to lectures
- thirty percent said their student unions were not in an accessible and inclusive environment

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<sup>39</sup> State of Equalities in Islington, Annual report, 2018

<sup>40</sup> Source: Department for Work and Pensions, Feb 2019.

<sup>41</sup> Ibid

<sup>42</sup> Family resource survey 2016/17

<sup>43</sup> Family resource survey 2016/17, Table 4.5

- eighty percent said their university careers service did not offer support specifically for disabled students
- seventy percent could not access a disabled students society on campus
- thirty percent said their graduation ceremony was in an inaccessible or non-inclusive setting
- over half said they would feel disadvantaged going through clearing
- just over half have full access to all university teaching rooms, study rooms and libraries
- only 20 percent have suitably adapted toilets with hoists in university buildings
- just one quarter have a freshers' induction for disabled students
- one-third have a society representing disabled students in the student union.

4.55 An earlier survey revealed:

- Problems associated with the Student Loan Company's management of the Disabled Students' Allowance - by the end of 2009, only 4,000 of 17,000 applications had resulted in a payment, taking an average of 20 weeks to be processed (according to the National Audit Office).
- The inaccessibility of college transport and a general sense of exclusion from the wider student experience are also cited as disincentives and or reasons for disabled student drop out - In 2009 the Muscular Dystrophy Campaign found that 40% of university inter-campus transport was inaccessible to disabled students, while 30% of university social and leisure facilities were also not accessible to students with mobility impairment
- The lack of any legal aid to support litigants in Equalities Act discrimination cases.

4.56 Currently mobility impaired students have very little choice of accommodation and disabled students are likely to be at a greater economic disadvantage than their peers and to face greater living costs, associated with the management of their disability. Also, the accommodation available within their pecuniary reach (particularly in London) is unlikely to be accessible or within a reasonable travelling distance of their university.

4.57 One justification for the development of purpose built wheelchair accessible student accommodation is that it fills that gap in the market.

4.58 To achieve this, the proportion of accessible units within a development will exceed the proportion of wheelchair users within the overall student population. It should be conveniently located and designed to increase the confidence of an ever more diverse range of students to engage with further and higher education. The objective is to create a generation of purpose built accommodation that is visitable and supports community cohesion, whilst providing a stock of wheelchair accessible units to meet current and future needs. In view of the relatively short lease lengths these will be fully fitted from the outset.

4.59 To interpret the National Technical Standard for student accommodation LB Islington worked with a group of disabled students, among them representatives of Trailblazers (the youth wing of Muscular Dystrophy UK). The group concluded that:

- all bed spaces (studios, individual en-suite rooms and general needs bedrooms in clusters) should incorporate a wheelchair turning circle;
- living and dining facilities (whether shared by cluster units or by floor) should be fully wheelchair-accessible; and
- where there are wheelchair accessible bedrooms (on the floor or within the cluster) the shared kitchens should also be wheelchair accessible.

4.60 It will not be expected that ensuite facilities in general needs bedrooms are usable or adaptable for use by a wheelchair user. Instead, at least one properly wheelchair accessible WC should be provided within the common parts of each floor of the development and 50% of those WCs should incorporate an accessible shower.

# 5 Introduction to meeting the Needs of Vulnerable Older People.

- 5.1 This section provides justification for Strategic and Development Management Policies H7 (Meeting the Needs of Vulnerable Older People). As well as explaining the council's approach to older persons accommodation, the paper responds to the comments received in relation to this policy area throughout the Local Plan consultation process.
- 5.2 It sets out the relevant existing local policy, and the London and national policy framework which guides the production of housing policies; and the key evidence base which supports the policies in the new Local Plan.
- 5.3 The topic paper then provides discussion on a number of specific policies/elements of policies, including links to evidence (where relevant) and comments on relevant representations received during previous rounds of consultation.

# 6 Policy framework for Meeting the Needs of Vulnerable Older People.

## National

6.1 The NPPF states that the “size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”<sup>44</sup>

6.2 The NPPF sets out a definition of older people in the glossary:

*Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.*

6.3 Planning Practice Guidance (PPG)<sup>45</sup> sets out advice on planning for the housing needs for different groups, with specific guidance provided for housing for older people and disabled people. New guidance released in June 2019 suggests that strategic policy-making authorities need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people. The guidance also suggests that plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people; and provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.

6.4 PPG gives an indication of the different types of specialist older persons housing, namely age-restricted general market housing, retirement or sheltered housing, extra care housing and residential care homes<sup>46</sup>. It is noted in PPG that this is not a definitive list. PPG<sup>47</sup> goes on to state that “plans need to provide for specialist housing for older people where a need exists”, and that “innovative and diverse housing models will need to be considered where appropriate”. However, it then states the following:

*“Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs. Plan-makers will therefore need to identify the role that general housing may play as part of their assessment. Plan-makers will need to consider the size, location and quality of*

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<sup>44</sup> NPPF (February 2019), paragraph 61

<sup>45</sup> Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

<sup>46</sup> Ibid, Paragraph: 010 Reference ID: 63-010-20190626

<sup>47</sup> Ibid, Paragraph: 012 Reference ID: 63-012-20190626

*dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.*<sup>48</sup>

- 6.5 The guidance also considers what evidence is necessary to determine the needs of housing for older people<sup>49</sup>.
- 6.6 Further guidance is also provided on allocating sites, viability and use classes order.
- 6.7 In terms of wider Government policy, the Islington Strategic Housing Market Assessment (SHMA)<sup>50</sup> notes that the Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. Therefore, despite the ageing population, current policy means that the number of care homes and nursing homes may actually decline, as people are supported to continue living in their own homes for longer.
- 6.8 The Government has committed to a policy review of adult social care with a Green Paper expected on the subject. The House of Commons have produced a research briefing paper in the interim<sup>51</sup>. Within that it is made clear that housing is a crucial part of the considerations for care and support and there will be a significant chapter on it in the green paper. In answer to parliamentary questions the Government has stated that *"we want people to be able to live in their own home for as long as possible"*<sup>52</sup>. Further detail on how sustaining people at home as long as possible will be supported is set out in the discussion section below.

## London

- 6.9 The London Plan – which is the Spatial Development Strategy (SDS) for Greater London - provides the London-wide planning framework to guide local plan-making. Local Plans must be in general conformity with the London Plan.
- 6.10 This section of the topic paper only makes reference to the new London Plan given that it is likely to be adopted prior to the examination of Islington's new Local Plan.
- 6.11 It is noted that the Mayor's general conformity response to Islington's Regulation 18 Local Plan (November 2018) assessed our plan against the new London Plan, and considered that it was in general conformity with the new London Plan. The Mayor's conformity response provided further comments on specific elements of the Local Plan; these are discussed below where relevant.
- 6.12 The London Plan policy H13: Specialist older persons housing focuses on extra care housing with care homes considered separately. The policy sets out indicative benchmarks used to inform local level assessment of specialist older persons housing need. The benchmark for Islington is 60 units per annum. The policy approach also

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<sup>48</sup> Ibid, Paragraphs: 012 and 013 Reference ID: 63-012-20190626 and 63-013-20190626

<sup>49</sup> Ibid, Paragraph: 004 Reference ID: 63-004-20190626

<sup>50</sup> Islington SHMA 2017, paragraph 7.91

<sup>51</sup> Page 26 Briefing Paper 8002: Adult social care: the Government's ongoing policy review and anticipated Green Paper (England). September 2019 <https://researchbriefings.files.parliament.uk/documents/CBP-8002/CBP-8002.pdf>

<sup>52</sup> Parliament. Department of Health and Social Care. Home Care Services: Written question – 152243. June 2018. <https://www.parliament.uk/written-questions-answers-statements/written-question/commons/2018-06-11/152243>

makes clear extra care housing will be subject to affordable housing requirements. The London Plan Inspectors' Report supports the requirement for extra care housing to provide affordable housing and also notes that benchmarks are not intended as maxima.

Local adopted policy

- 6.13 As set out in the draft Strategic and Development Management Policies (SDMP) Islington is expected to experience growth in its older population as part of the long term trend in population growth.
- 6.14 The adopted Core Strategy in 2011 recognises the needs of older people in the context of space standards and design quality standards with these identified as supporting people to remain in their accommodation longer. The Development Management Policies 2013 set out policy for care homes in Policy DM3.8 which supported the provision of sheltered housing and care homes setting out requirements around level of support, access to local facilities and relationship of site to surrounding facilities. A 10% wheelchair accessibility requirement was included in the policy.

# 7 Background and local evidence for Meeting the Needs of Vulnerable Older People.

## Islington Extra Care Housing (ECH) Needs Assessment

- 7.1 The Council has collaborated with colleagues in the Council's Strategy and Commissioning Team, who have provided further detail on extra care housing need in the borough in the Islington Extra Care Housing (ECH) Needs Assessment (see Appendix 2). This document is intended to inform future planning and commissioning decisions in order to meet the needs of older people locally, in line with Islington, pan-London, and national policy. It is an evolving part of the corporate position in relation to providing for the long term needs of the borough's older population. The key elements of the assessment are discussed below.
- 7.2 There is currently one ECH Scheme in Islington (the Mildmays) which is comprised of 87 studio, one bedroom and two bedroom units, all of which are let at social rent. There is no shared ownership or private ECH in the borough.
- 7.3 The Mildmays is primarily designed as a general needs older people's scheme, however the residents of the scheme have a range of needs. There is currently no specialist provision in-borough, for example, for people with dementia, older people with learning disabilities, or older people with mental health needs.
- 7.4 The Mildmays is a popular option for older people currently – it is well occupied, a relatively consistent rate of referrals, and a waiting list (20 at the time of writing) of interested residents. Demand is more limited for the studio units than for one bedroom flats. This suggests that there would be demand for additional appropriate high quality affordable provision.
- 7.5 More Choice, Greater Voice – a toolkit for producing a strategy for accommodation with care for older people (developed by the Housing Learning and Improvement Network (LIN), the sector body who advise on best practice)<sup>53</sup> recommends 25 units of ECH per 1,000 people aged 75 and over in the population. It recommends that these are divided equally between rent and sale.
- 7.6 Based on Projecting Older People Population Information (POPPI) data<sup>54</sup> on the over 75's, a broad approximation of the level of need for Extra Care in Islington can be projected at various intervals throughout the plan period, as follows:

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<sup>53</sup> Available from: <https://www.housinglin.org.uk/Topics/type/More-Choice-Greater-Voice-a-toolkit-for-producing-a-strategy-for-accommodation-with-care-for-older-people/>

<sup>54</sup> <https://www.poppi.org.uk/>



Table 7.1: Housing need for ECH in Islington to 2035

Year	Population aged 75+	Total Need for ECH
2019	9,500	238
2020	9,600	240
2025	11,300	283
2030	12,700	318
2035	14,800	370

- 7.7 It should be noted that this may be an underestimate of need because it only accounts for need of frail older people and does not include other adult social care client groups, for example Learning Disabilities or Mental Health. These wider needs have also been assessed by colleagues in the commissioning team and are set out in appendix 2. There may be crossover in terms of meeting needs when it comes to providing accommodation which meets more complex health care needs for example older people with learning disabilities and/or mental health care needs. In policy terms their accommodation needs may be provided for through policy H9. The relevant policy to determine a proposal against will be considered on a case by case basis.
- 7.8 Social-rented housing accounts for 42% of all homes in the borough<sup>55</sup>, compared to the London average of 24.1%. In Islington, the gap is even larger for older people, 62% of whom live in social housing<sup>56</sup>. The Housing LIN recommendation of an equal split of rental and for-sale units is therefore unlikely to meet older persons need in the borough, and need for social rent ECH should instead be taken as the 'Total Need for ECH' figures listed above.
- 7.9 The above analysis indicates that Islington is currently undersupplied by 151 social rent ECH units based on full ECH need (238) being taken as social rent, minus the Mildmays (87 units). To address this shortfall and meet future needs Islington will need to develop an additional 231 Social Rented units in-the borough by 2030 and 283 units by 2035.
- 7.10 Analysis of older people's needs on the Housing Register indicates that there is more demand for one bedroom units than two bedroom units. Providers and commissioners consulted with advised that, in their experience, demand for two-bedroom units has been limited and, as a result, they have been hard to fill and left void, with resulting financial losses incurred by providers. In Islington, demand for studio apartments at the Mildmays has been lower than demand for one-bedroom units, which lends support, albeit limited, to this anecdotal evidence. Learning lessons from this, future developments should consist of mostly one-bedroom units, with a small proportion of schemes designated for two-bedroom units, and no studio units.
- 7.11 Soft market testing, commissioner engagement, and a review of current practice indicates that, in order to stack up financially, schemes must include a minimum of 55 units. To avoid an institutional atmosphere and ensure safe delivery, individual schemes should consist of no more than 90 units. Extra Care villages may be suitable

<sup>55</sup> Islington SHMA 2017, paragraph 3.9

<sup>56</sup> Islington SHMA 2017, paragraph 3.29

for accommodating a greater quantum of units, however, it is noted that these are often larger-scale developments which means that there are unlikely to be any opportunities to develop them in Islington given the required site size and the land constraints evident in the borough. This therefore suggests that Islington needs an additional 3-5 schemes to meet needs, based on schemes ranging from 55-90 units. In order to meet this need, the Council is actively investigating use of its own land to develop affordable ECH schemes.

- 7.12 The London Plan recommends that Islington should develop 60 additional units of ECH per year – this would therefore mean the borough should develop 600 additional units over the next 10 years. Given the limited availability of land for development in the borough and the need to meet a range of other development needs, this benchmark is not considered deliverable in the borough. Even if land were to become available, the costs of the required care and support to be delivered could be unviable at a time of ongoing austerity. Also, as demonstrated by the Council’s evidence, older persons need is predominantly for social rented accommodation, therefore, the benchmark does not reflect actual need in Islington.

### Islington SHMA

- 7.13 The SHMA was published in 2017 and included a section on housing for older people<sup>57</sup>. The survey data which underpinned the SHMA considered Camden and Islington together. Based on the survey results, a high proportion of older people (much higher than the average for all households) are in 2 or 3 bedroom owner-occupied houses, with higher than average proportions also in 1 to 3 bedroom flats and 4 bedroom houses. Table 7.2 is extracted from the SHMA<sup>58</sup> and sets out the housing mix and tenure split.

Table 7.2: Existing Housing Mix for Older People Households

Property Size	Property Tenure and Type					Total
	Owner Occupied		Shared Ownership	Private Rent	Social Rent	
	House or bungalow	Flat or maisonette				
Bedsit or room	-	-	-	0.5%	1.2%	1.7%
1 bedroom	-	6.7%	0.2%	6.5%	19.1%	32.4%
2 bedrooms	5.2%	10.9%	0.0%	3.7%	12.9%	32.7%
3 bedrooms	7.5%	7.3%	0.1%	1.2%	5.1%	21.1%
4 bedrooms	6.6%	0.8%	-	0.8%	0.6%	8.8%
5+ bedrooms	3.2%	-	-	-	-	3.2%
<b>TOTAL</b>	<b>22.5%</b>	<b>25.6%</b>	<b>0.3%</b>	<b>12.7%</b>	<b>38.9%</b>	<b>100%</b>
With housing benefit support	-	-	-	8%	39%	46%
Without housing benefit support	-	-	-	17%	37%	54%

- 7.14 The reports makes clear that the survey data considered Camden and Islington together and noted that at the time of the 2011 Census the largest proportion of older persons in Islington occupied social rented accommodation (this explains the difference between the figure of 42% SR cited in paragraph 7.8 above). Therefore the

<sup>57</sup> The SHMA does not identify extra care housing in the survey given the limited amount of ECH in Islington.

<sup>58</sup> Islington SHMA 2017, figure 115

table above may not be a true picture. The survey also identified a high number of older people living in social rent. There are 733 sheltered housing units currently in Islington.

- 7.15 With regards affordability of housing for older people the SHMA<sup>59</sup> considered that half of older people households would be able to afford market rent of the size required, whilst more could afford social rented housing and the largest proportion – three quarters could afford a bedsit or room.
- 7.16 The report notes that the number who actually owner occupy broadly reflects the number who can afford to owner occupy. The report notes that a larger proportion are in owner-occupied flats or maisonettes, which may in part reflect specialist provision such as sheltered housing. Shared ownership is considered to be under-provided and under-utilised by older people, perhaps not surprisingly given it may not be a desirable option for many who currently owner occupy and can afford to do so – the report also notes that there is limited access to mortgage products for older people which means that people in the social or private rented sectors would be unlikely to be able to move to home ownership unless they have access from another source. The report notes that more people than might be expected live in the private rented sector given the proportions who can afford an owner-occupied property of the size needed, with a third receiving housing benefit support.
- 7.17 Social rented properties form the second major tenure for older people households, with 38.9% living in the tenure and 63% being able to afford a property of the size needed. The report notes that for 37% of older people, social rented or private rented with Housing Benefit will be the only accommodation options; even then, it can be expected that those households will not be able to afford a property of the required size. Under-occupation is prevalent across the home ownership tenures.
- 7.18 The SHMA also modelled older people's housing needs. The report identifies that the population in older age groups is projected to increase substantially during the Plan period, with 21% of the overall population growth (7,600 persons) projected to be aged 65 or over and almost 10% projected to be 75 or over (3,400 persons); however the increase in Islington means that the proportion of older people as a total of the population is lower than for London and for England as a whole. The SHMA household survey identified that among older households (where all residents were aged 65+), 42% include a household member with a long standing illness, disability or infirmity; and 22% of all older households have a household member with a long standing illness, disability or infirmity which affects their housing requirements.
- 7.19 The SHMA considered three projections for determining need:
- the Housing Learning and Improvement Network (LIN) Toolkit 2012;
  - the London SHMA benchmarks for London boroughs;
  - a projection of need based on holding the current rate of supply constant for the 2035 population
- 7.20 The Housing (LIN) toolkit and London Plan use a standardised methodology which results in a higher figure compared to projecting the current rate of provision forward.

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<sup>59</sup> Islington SHMA 2017, paragraph 7.73

Over a twenty year period from 2015 to 2035, the total need estimated by the three projections is as follows:

- Housing LIN toolkit - 1,120 units;
- GLA SHMA - 1,800 units; and
- current rate - 373 units.

- 7.21 Within these totals there are needs projected across various tenures / types of accommodation.
- 7.22 The Housing LIN total is based on a similar population projection scenario to that set out in Table 7.1: Housing need for ECH in Islington to 2035<sup>60</sup> (an increase from 8,748 persons in 2015 to a population of 13,212 in 2035) and identifies a total additional modelled demand of 201 units for extra care, 89 for sheltered housing, 268 for conventional sheltered housing, 27 for older people with dementia and 536 for leasehold schemes for the elderly. These are split evenly 50/50 between owned and rented. The Housing LIN applies a benchmark need for particular housing types per thousand people aged 75+, which are based upon a standard proportion of people aged 75+ moving to particular types of housing schemes. The SHMA makes the point that this uses national data which does not necessarily pick up on local nuances, such as different levels of health or affordability in local areas.
- 7.23 The London Plan benchmark figure used in the SHMA report come from the 2016 London Plan benchmarks, set out in Annex 5 Table A5.1. These are higher than those published in the new London Plan<sup>61</sup>, providing an annual total figure for Islington of 90 units split between 50 affordable rent, 10 intermediate and 30 for private sale. The report totals the London Plan benchmarks figures over 20 years giving a total of 1,800 units, which is higher than the 1,120 units from the Housing LIN, however, the London Plan benchmarks are based on the population aged 65+ while the housing LIN are based on the population aged 75+.
- 7.24 The third projection is found by holding the current rate of provision fixed to 2035. This assumes that the projected additional households over 65 require proportionally the same amount of specialist accommodation that is currently available, reflecting the borough's Housing Strategy that includes older people remaining in their own home as a housing option. Projecting the current rate of supply forward does not take into account any increase in supply required beyond maintaining existing rate of provision. This identifies additional demand of 373 units made up of 352 rented and 21 private sale.
- 7.25 The SHMA provides useful context in terms of existing accommodation for older people, however the Council considers the evidence set out by the Council's Strategy and Commissioning team takes precedent in terms of identifying need and prioritising need for affordable ECH. Islington has a finite amount of land, various constraints and a number of competing development needs therefore this affects policy decisions around what needs are prioritised.

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<sup>60</sup> The ECH needs assessment is specific to extra care whereas the 2012 Housing LIN Toolkit models various different types of specialist accommodation. See figure 120 in the SHMA for details. The Housing LIN Toolkit modelled need for extra care is 201 in 2035.

<sup>61</sup> The new London Plan has a total benchmark of 60 units per annum, as noted in section 2 of this topic paper.

# 8 Discussion for Meeting the Needs of Vulnerable Older People.

## The London Plan Benchmark

8.1 As noted in section 6, the London Plan includes a benchmark which indicates an amount of specialist older persons accommodation that should be delivered by each borough. The approach to identifying the benchmark is based on the Retirement Housing Group (RHG) Model, which models potential demand for specialist older persons housing and is based on a propensity to move. The assumption is that 15 to 20% of older person households (aged 75 and over) would live in specialist older persons housing if it were available. The model in this case has used a lower end estimate – 15% of households aged 75 and over - because the stock of general needs flats in London is higher than the national average. General needs flats are more attractive to older people compared to houses because they are generally considered more accessible and therefore it can reduce demand for specialist accommodation. A small proportion (2.5%) of households below age 75 have been added too as it was recognised that they already live in specialist housing and should be included. The model suggested that, to 2029:

- Extra Care housing is needed across all three tenures – rent, sale and shared ownership;
- There is potential demand for sheltered housing for sale and shared ownership and for market rent;
- There is no need for additional provision of sheltered housing for affordable/social rent; and
- The total potential demand for specialist older persons housing across London adds up to just over 4,000 units a year.

8.2 The total number identified differs from the previous evidence produced in 2014<sup>62</sup> showing a small increase across London. Most boroughs show a small increase with a number showing a small decrease, like Islington. There is no explanation given for the changes in various boroughs figures, but they are likely due to changes in assumptions over existing home ownership and levels of affordability, as well as changes in assumptions over the supply of specialist accommodation in boroughs.

8.3 The benchmark is not a binding target. It can be viewed as an aspirational component of the overall housing target which boroughs should look to address. Where local

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<sup>62</sup> This is the explanation of the calculation in the 2014 study – which is not included in the 2017 study: *'Calculations are based on the assumption that 15% of households aged 75 and over and 2.5% of households 65-74 require specialist older persons housing, that 50% of the affordable rented older persons housing stock is not fit for purpose but all the sale stock is fit for purpose. Affordable and private renters require an affordable rented product. 80% of home owners require a sale product and 20% require a shared equity product. We calculated potential demand in 2015 and 2025 and compare this with current supply. We then take the average of the surplus/deficit for 2015 and 2025 to derive an annual target for provision of retirement housing by each Borough.'*

evidence of need exists, as it does with Islington, this is considered to take priority over the London Plan figures, which are very high level and include a number of broad assumptions.

- 8.4 The Mayor of London commented on policy H7 in his Regulation 18 conformity comments, noting that the policy comprehensively follows and builds on the guidance set out in Policy H13 of the new London Plan, but also that it should reflect the annual borough benchmark for specialist older persons housing set out in Table 4.4 of the new London Plan.
- 8.5 This response is contradictory. The Council's approach is to meet older persons housing needs through general needs housing designed to be adaptable, with a proportion of affordable ECH. This is clear in policy H7 and has been discussed directly with GLA officers. If this approach '*follows and comprehensively builds*' on policy H13, then there is no sense in reflecting the benchmark. The policy is openly taking a different approach. Given that the Mayor's Regulation 19 response did not follow up this point or raise any other issue regarding policy H7, we consider that the policy is in line with the London Plan.
- 8.6 This is an important point to keep in mind when considering the Regulation 19 response from the Home Builders Federation (HBF) (Local Plan respondent reference R19.0106).
- 8.7 The HBF responded to both Policy H1 Part L and H7 stating that the policy is unsound as it will fail to cater for the need for older persons housing as required by national and regional policy and guidance. They stated that the Local Plan will need to be revised to refer to the new London Plan older persons benchmarks, and that the policy should introduce a 'presumption in favour of schemes involving older persons housing' in the policy if the benchmark target is not achieved in both of the previous two years after the plan has been adopted. The presumption would dis-apply as soon as the benchmark target is achieved in the current year.
- 8.8 The HBF also consider that the statement in paragraph 3.18 to not usually support applications for older people to be unsound and unjustified. The HBF response states 'that the Council will reject applications for older persons housing...; the effect of Islington Council's decision not to provide any older persons housing would be to shift the burden of responsibility onto other boroughs. They would be faced with greater demands for older persons housing in their own areas as to make-up for those homes not being provided in Islington – in the order of 60 units a year'.
- 8.9 The HBF response to policy H7 stated that the Policy should be revised by the Council to support the provision of older persons housing – both C2 and C3 – using the indicative benchmark in the London Plan as the basis for monitoring provision against needs.
- 8.10 The HBF response went onto say the Council's rejection of older persons' housing on the basis that it requires more communal space is mean-spirited. Communal areas are an essential part of housing for older people. Islington Council should avoid developing a reputation as borough that is only interested in housing the young and able-bodied. HBF quote research by WPI which argues how the provision of specialist older persons housing will help reduce the cost to the public purse in terms of reduced health and social care dependency.
- 8.11 The Council notes that the policy does not preclude specialist older persons housing – in fact it puts in place criteria against which proposals for older persons

accommodation (be that ECH or care homes) will be assessed. In terms of the strategic point, and the prioritisation of conventional housing adaptation as the prime method of meeting the need for older peoples accommodation, this is justified on two levels.

- 8.12 Firstly, Islington has a lack of developable sites. The Local Plan includes a number of sites which will assist in meeting various development needs, including for housing and employment uses, but it is quite simply not possible to meet all needs. By focusing on general needs housing which can be adapted over its lifetime to accommodate ageing occupants, this makes the best use of land that is available in the borough. It also has potentially significant benefits in terms of sustainability, particularly with regard to the circular economy, as it means that buildings can be re-used and utilised by different occupants and is likely to reduce the need for significant redevelopment and/or demolition in future.
- 8.13 The second key point to note is that the Council's approach is consistent with research, people's aspirations, national policy and guidance (as noted in section 2) and reflects the direction of travel in terms of the Government's Health and Social Care agenda.
- 8.14 The following references all point towards the importance of helping people to remain in their own homes for as long as possible:
- The Market Assessment of Housing Options for Older people identified that a wider choice and availability of mainstream housing might reduce the need for more specialist housing with some older people preferring to have larger mainstream dwellings with no communal space and lower costs<sup>63</sup>. The report recognised there was limited choice for older people moving home to accommodate support needs. It also analysed the accessibility issues of the existing housing stock and the minor improvements necessary to make existing stock more accessible.
  - A Report by Future of London<sup>64</sup> identified three priorities including, improving the mix of tenures and choice of properties and financial models as well as optimising the existing stock through upgrading homes and facilitating adaptations.
  - The report of the Parliamentary Select Committee on Intergenerational Fairness and Provision<sup>65</sup> heard evidence from various parties including Age UK who identified that the focus should be on a wider range of housing options for older people, including properties built to higher accessibility standards and encouraging the development of integrated age friendly homes and communities that bring younger and older generations together.
  - The Mayor of London's Housing Strategy identified the importance that London's housing has in enabling older and disabled Londoners to lead independent and fulfilling lives. The strategy identifies that there needs to be a range of options

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<sup>63</sup> Market Assessment of Housing Options for Older people. Shelter and Joseph Rowntree Organisation 2012. [https://www.npi.org.uk/files/5213/7485/1289/Market\\_Assessment\\_of\\_Housing\\_Options\\_for\\_Older\\_People.pdf](https://www.npi.org.uk/files/5213/7485/1289/Market_Assessment_of_Housing_Options_for_Older_People.pdf)

<sup>64</sup> Are we ready for the boom? Housing Older Londoners. Future of London. 2018.

<https://www.futureoflondon.org.uk/2018/03/27/housing-older-people-report-launch/>

<sup>65</sup> Para 109 Tackling Intergenerational Unfairness. House of Lords Select Committee April 2019

<https://publications.parliament.uk/pa/ld201719/ldselect/ldintfair/329/329.pdf>



available, particularly as more older people are choosing to remain in their own homes rather than move into residential institutions<sup>66</sup>. This is supported by evidence provided to the previous London Plan examination.

- Contributing to the reform of social care debate is the Health and Social Care and Housing, Communities and Local Government Committees' joint report into Long-term funding of adult social care which identified the importance and link between social care and housing. The report identified the negative effect that poor quality, unsafe and poorly-adapted housing can have on health and wellbeing and knock on effect on hospital admissions and delayed discharges and that well-maintained, appropriately adapted and safe housing will help keep people healthy and independent. The report recommended that amongst other things the adult social care review should consider how, through improvements, adaptations and wider access to specialist housing, we can ensure that the home environment better aids health and wellbeing and the delivery of social care.
- The Communities and Local Government Committee *Housing for older people* second report published in February 2018<sup>67</sup> found that a quarter of people who moved into extra care housing with social care needs (or went on to develop them) experienced an improvement in health care needs within five years, and were less likely to be admitted to hospital overnight and had fewer falls – based on Research by the International Longevity Centre-UK. The report identified the benefits of building to higher standards of accessibility, such as M4(2) and M4(3) which would “age proof” new development<sup>68</sup>. The report also identified the concerns about the cost of and costs associated with specialist housing and its resale value. Purchasers of some forms of ECH are required to pay regular service charges for the upkeep of the facilities and for the shared services<sup>69</sup>. The report identified that ECH was generally more expensive than average flats and that in some cases the resale value was lower than the purchase price<sup>70</sup>.

8.15 The Council has identified that the luxury aspect of extra care housing referenced by evidence in the CLG committee on housing for older people<sup>71</sup> is the type of product not supported in the borough because it undermines the provision of affordable housing. The provision of services and space which residents do not need as part of a care package is superfluous and unnecessary and should not be a priority in land use terms. Provision of high end restaurants, swimming pools and cinemas are not necessary to meet care needs and will have a significant impact on viability. Specialist older people's housing is more expensive to develop than mainstream general needs housing, principally because it provides more communal space which requires more land per unit but does not generate revenue. A sensible provision of communal facilities is necessary to provide for health care needs but over provision of facilities which are not necessary affects scheme viability and overall delivery of affordable housing. Given the finite quantity of land in the borough there is a need to make best possible use of land to meet higher priority uses such as affordable extra care and any

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<sup>66</sup> Para 5.8 Mayor of London. London Housing Strategy May 2018

[https://www.london.gov.uk/sites/default/files/2018\\_lhs\\_london\\_housing\\_strategy.pdf](https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf)

<sup>67</sup> Page 41 para 88 <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/370/370.pdf>

<sup>68</sup> Ibid para 81 page 37

<sup>69</sup> Ibid para 93 page 42

<sup>70</sup> Ibid para 95 page 43

<sup>71</sup> Ibid para 96 page 43



potential negative impact on this is not supported. Using market extra care to provide affordable extra care will not maximise the amount of affordable extra care provided. Conventional housing will deliver the maximum amount of affordable housing and affordable extra care home accommodation will be sought as part of this in line with the Councils evidence of need. It is considered that larger housing sites such as Holloway Prison offer a particular opportunity to deliver this kind of accommodation.

- 8.16 In addition considering the low level of home ownership amongst older people in Islington there is already a lower level of need for this type of 'retirement living' accommodation. PPG recognises that people may wish to stay in their own accommodation and that plans only need to provide for specialist housing for older people where a need exists. Whilst need may exist for low levels of market specialist accommodation for older people it is not the priority and adaptations to conventional housing are considered the best approach for meeting this need. PPG supports provision of homes which can be adapted to meet changing needs and Policy H4 aims to provide sufficient numbers of accessible and adaptable homes to help meet these needs. Further explanation is provided in the housing topic paper in relation to provision of accessible and adaptable housing.
- 8.17 We also reiterate the response from the Mayor, which, despite containing an internal contradiction, can be taken as support for the policy. Policy H7 would therefore assist in meeting strategic need for older persons' accommodation, albeit this would not be specialist accommodation (leaving aside any affordable ECH that comes forward). London is classed as a single housing market for the purposes of strategic plan-making, but it is nonsensical to suggest that this precludes individual boroughs developing their own policies relating to meeting housing need, and reflecting their own local circumstances, where justified.

### Adaptations to Housing

- 8.18 The current Islington Housing Strategy 2014 – 2019 sets out four priorities with a number of key goals aiming to help deliver these priorities. One of these is the goal to look at new ways of working together to increase support and choice for older people to deliver better housing options and services. This will include using the disabled adaptations programme<sup>72</sup> to encourage independent living and help to reduce accidents in the home. Another goal was to increase levels of independence and provide disabled facilities grants to occupants of private sector homes and housing association homes to enable people to remain in their homes. The Housing Strategy is in the process of being updated and will continue to include similar priorities with regard to independent living.
- 8.19 The Housing Strategy provides important support to the Local Plan approach by committing Council resources to improving housing conditions and enabling older people to stay in their own home. The Mayor of London's Housing Strategy also notes the importance of enabling older Londoners to lead independent and fulfilling lives<sup>73</sup>.
- 8.20 The Local Plan in policy H4 introduces the potential in paragraph 3.74 to accept a S106 contribution in lieu of Category M4(3) wheelchair user dwellings on site where there is a supply /demand imbalance identified for wheelchair accessible units. The

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<sup>72</sup> Grants are available from the Council as a Disabled Facilities Grant (DFG)  
<https://www.islington.gov.uk/housing/private-sector-housing/grants/disabled-facility-grants>

<sup>73</sup> London Housing Strategy, paragraph 5.8, available here:  
[https://www.london.gov.uk/sites/default/files/2018\\_lhs\\_london\\_housing\\_strategy.pdf](https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf)

intention is that this funds the development of new and adapted wheelchair accessible units elsewhere in the borough where demand is more acute. This fund could potentially support future adaptations of the existing housing stock.

- 8.21 The wider context for supporting people in older age is recognised by the public health role of the Council. Camden and Islington Public Health produced a report in 2018<sup>74</sup> which explain how Healthy Ageing can be supported in both boroughs. This covered quality of life, environment and social determinants, managing major life changes and supporting health and care needs. The report identifies, amongst other projects and programmes, the Care Closer to Home Integrated Networks (CHINs)<sup>75</sup>. CHINs are being developed across both Camden and Islington, as part of a programme of work focused on 'care closer to home' across North Central London. CHINs or 'neighbourhoods' in Camden are networks of services based around clusters of GP practices that are delivering more coordinated, person-centred care in response to the particular needs of the local population of around 50,000 residents. Frailty is one of the focus of CHINs with improved early identification and diagnosis through to proactive management and social prescribing for frail people being considered.
- 8.22 Older age is characterised by a steady rise in risk of falls and frailty as people get older, which is linked to physiological changes and risk factors. Falls are the single largest cause of emergency admissions and hip fractures in older people, with as many as 6% of all falls in Camden and 9% of all falls in Islington resulting in a hospital admission in 2016. Those who experience a fall are likely to fall again, with between 60% - 70% of people having recurrent falls<sup>76</sup>. The Local Plan approach to accessible and adaptable housing, an emphasis on safe and accessible built environment / public realm and an approach to the design of development that is integrated within its environment and underpinned by a set of design principles in Policy PLAN1 all contributes to reducing some of the risk factors that contribute to falls.
- 8.23 Most people with dementia want to continue living in their own homes for as long as possible. Remaining at home benefits the individual with dementia, through greater quality of life, and society, by reducing costs of care. An example of local services supporting people with dementia is the Memory Service run by Camden and Islington NHS Foundation Trust and has some of the highest diagnosis rates for dementia in the country. While early diagnosis may potentially enable people living with dementia to plan care, it is likely that the most significant shifts towards people with dementia being able to stay in their home for longer may come from technological advances. Technology is already enabling people with dementia to stay at home for longer, through telecare (remote sensors used to mitigate risks, such as risk of leaving the gas on that might previously have necessitated a move to a care home). Research<sup>77</sup> is seeking to harness recent advances in artificial intelligence, engineering, robotics and sleep science to create new technologies that will deliver the highest quality dementia care in the home. Researchers will develop a range of devices that allow them to track a person's behaviour and health at home. They will harness the power of artificial intelligence to understand an individual's behaviour and predict when problems might arise – and also develop ways to quickly identify medical complications that may arise

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<sup>74</sup> See here:

<https://democracy.islington.gov.uk/documents/s17645/Appendix%20%20Healthy%20Ageing%20Report%20FINAL%20FEB%202019.pdf>

<sup>75</sup> Ibid page 93

<sup>76</sup> Ibid page 82

<sup>77</sup> UK DRI Care Research & Technology centre based at Imperial University <https://ukdri.ac.uk/centres/care-research-technology>

in the home. Other research is helping improve and develop the way care workers can better help people with dementia live at home longer through developing training for home care workers to support them in delivering person-centred care. Home care organisations and care workers enable people to live at home longer<sup>78</sup>.

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<sup>78</sup> UCL Alzheimer's Society Centre of excellence <https://www.alzheimers.org.uk/research/our-research/research-projects/nidus-project>

# Appendices

## Appendix 1: PBSA rental changes between 2010 and 2019

Planning Ref.	Completion date	Address	Room types	Weekly rent min-max range for 2010	Weekly rent min-max range for 2019 (% increase)	Information Source
P043220	2006/07	Piccadilly Court 457-463, CALEDON IAN Road, N7 9BA	en-suite studio	£194 £279	£245 (26%)	<a href="https://www.staffordhouse.com/ugc-1/1/5/0/london_-_piccadilly_court_-_2019.pdf">https://www.staffordhouse.com/ugc-1/1/5/0/london_-_piccadilly_court_-_2019.pdf</a>  (previously Unite)
P050529	06/2007	Charles Morton Court 37-43, Green Lanes, N16 9BS	en-suite premium studio	£180 £219	£230 (27%) £299 (36%)	<a href="https://www.collegiate-ac.com/uk-student-accommodation/london/charles-morton-court">https://www.collegiate-ac.com/uk-student-accommodation/london/charles-morton-court</a>  (previously Unite)
P053035	09/2007	Willen House 8-26, Bath Street, EC1V 9EL	Studio Study Rooms < 17m <sup>2</sup> to > 23m <sup>2</sup>	£171 £191	£248 (45%) £275 (43%)	<a href="http://www.willenhouse.com/index.php?id=30&amp;action=faq">http://www.willenhouse.com/index.php?id=30&amp;action=faq</a>
P052070	12/2007	Liberty House, 214-222, St John Street, EC1V 4PH	Studio	£230 £315	£343 (49%) £431 (36%)	<a href="https://www.libertyliving.co.uk/student-accommodation/london/liberty-house-st-john-street/">https://www.libertyliving.co.uk/student-accommodation/london/liberty-house-st-john-street/</a>
P061963	06/2008	Therese House 29-30, Glasshouse Yard, EC1A 4JN	Standard en-suite Premium studio	£180 £275	£317 (76%) £365 (32%)	<a href="https://thestudenthousingcompany.com/locations/london/therese-house">https://thestudenthousingcompany.com/locations/london/therese-house</a>  previously University of London Housing Services. According to website refurbished in 2017
P052794	01/2008	Nido King's Cross 200 Pentonville Road London N1 9JP	Single studio en-suite (size 16m <sup>2</sup> to 20m <sup>2</sup> )	£245 to £295	£399 (62%) £464 (57%)	<a href="https://www.chapter-living.com/properties/kings-cross">https://www.chapter-living.com/properties/kings-cross</a>  Previously Nido Student Living. Note bigger and more expensive studios available up to £509
P061450	08/2008	Canto Court 122-128, Old Street, EC1V 9BD	Studio	£264 to £459	£325 to £545  23% to 18%	<a href="https://cantocourt.com/">https://cantocourt.com/</a> <a href="https://www.accommodationforstudents.com/student-hall/1823">https://www.accommodationforstudents.com/student-hall/1823</a>  Previously Unite.

P070059	2009	Elizabeth Croll House 27 Penton Rise Kings Cross London WC1X 9EJ	En-suite  studio	£279  £289 to £335	£395 to £435 36% to 30%	<a href="http://www.unite-students.com/student-accommodation/london/elizabeth-croll-house?">http://www.unite-students.com/student-accommodation/london/elizabeth-croll-house?</a> <a href="https://www.unilodgers.com/uk/london/elizabeth-croll-house">https://www.unilodgers.com/uk/london/elizabeth-croll-house</a>  No longer appears to do en-suite accommodation with shared facilities
P072869	Due 2010	Wedgwood Court 309 Holloway Road Islington London N7 9DS	En-suite  studio	£205  £279	£284 (38%)  £380 (36%)	<a href="https://www.chapter-living.com/properties/highbury">https://www.chapter-living.com/properties/highbury</a>  Previously Unite
This is not a comprehensive list due to lack of information being available but it does give a clear indication of the rent levels being charged in new student halls of residence in Islington			Range in rent	£171 to £459	£230 to £545	
			Average rent overall Average rent: (en-suite) (studio)	£255 (£216) (£289)		

## Appendix 2: Islington Extra Care Housing (ECH) Needs Assessment

## Extra Care Housing Needs Assessment

### 1. Purpose

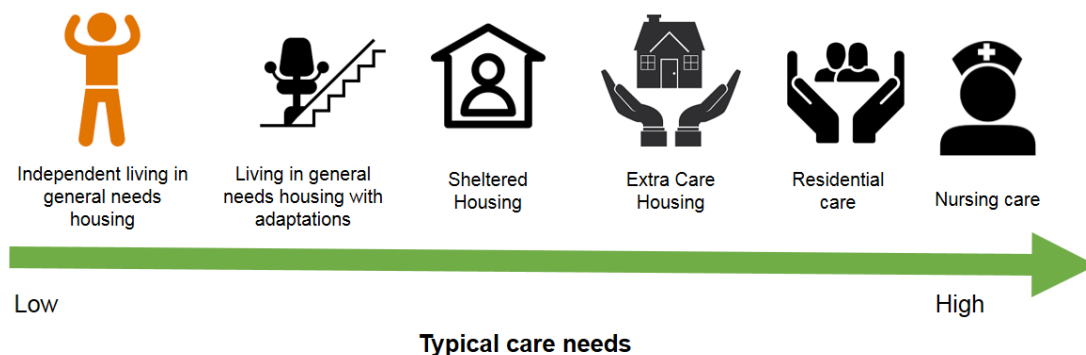
- 1.1. This paper sets out the background to, and findings of, the Islington Extra Care Housing (ECH) Needs Assessment. It is intended to inform future planning and commissioning decisions in order to meet the needs of older people locally, in line with Islington, Pan-London, and national policy.

### 2. Background

- 2.1. The Islington ECH Needs Assessment is the culmination of work undertaken by Islington health and social care commissioners, in partnership with residents, professionals, and providers between July and November 2019.
- 2.2. In addition to engagement with key stakeholders, local and national best practice research, data analysis, and benchmarking have informed findings.
- 2.3. For further information about the background to this work, please see Appendices One and Two.

### 3. What is Extra Care Housing?

- 3.1. Extra Care Housing is specialist housing designed to meet the needs of older people, people with long-term conditions, and people with disabilities who may struggle to remain in their own home.
- 3.2. ECH can be understood to be part of a spectrum or continuum of accommodation and housing-related solutions for these groups, illustrated below:



Please note, the above is illustrative of interventions which may be appropriate in line with changing circumstances (and in conjunction with other interventions e.g. domiciliary care) and does not represent a linear set of responses to a set profile of needs. Decisions about housing, care, and support should be taken on an individual and personalised basis, with a view to maximising independence.

3.3. There is no single model of ECH, however, there are defining features which distinguish it from other forms of housing or accommodation for older people, such as sheltered housing or care homes, and general needs housing. These are:

- It is first and foremost a type of housing. It is a person's individual home not a care home. This is reflected in the nature of its occupancy through lease or tenancy, and people having their own front door and ability to come and go as they please.
- Care and support is accessible on-site 24 hours per day, seven days per week, 365 days per year. This offers peace of mind and security as issues arise and flexibility to change the intensity and type of care and support in line with changing needs.
- In addition to accommodation units, there are communal (e.g. lounges, gardens, etc.) and professional (offices, meeting rooms, etc.) facilities on-site to promote inclusion and community development.

3.4. ECH is underpinned by three principles:

- Promoting independence.
- Promoting empowerment.
- Accessibility as default.

#### **4. Policy context**

- 4.1. Local, regional, and national health, social care, and planning policy promotes the importance of identifying and meeting the housing and care needs of older people and the benefits of doing so.
- 4.2. The Care Act (2014) duty to promote wellbeing makes reference to provision of 'suitability of accommodation' – ECH forms part of that.
- 4.3. Ministry for Housing, Communities, and Local Government (MHCLG) guidance released in June 2019 suggests that strategic policy-making authorities need to determine the needs of people who will be approaching or reaching retirement over the Local Plan period, as well as the existing population of older people.
- 4.4. The London Plan includes specific commitments to developing specialist older people's housing, with borough-level benchmarks for additional provision – detailed below.
- 4.5. The Islington Local Plan set out that older people's housing needs will primarily be met through development of high quality, adaptable general housing, with a recognition that some specialist provision will be required. The need for this specialist housing is set out in this documentation.

#### **5. Extra Care Housing – benefits**

- 5.1. The London Borough of Islington (LBI) is committed to supporting Older People to live healthy, purposeful, independent, connected, and fulfilling lives. ECH can contribute to this in a variety of ways:



- ECH's ethos of promoting independence and empowerment – doing with, rather than doing for, wherever possible – should enable older people to continue to live as independently as possible, for as long as possible, improving their quality of life and experience of older age in Islington.
- ECH schemes provide an opportunity to reduce social isolation with activities and communal facilities offered on-site for residents. This can also benefit local communities, for example, when facilities are opened up for use by voluntary organisations or when schemes undertake intergenerational work.
- Bespoke and flexible packages of care and support can enable ECH residents to maintain good health and manage long-term conditions well. In addition to on-site services, ECH schemes can benefit from wraparound health input e.g. from designated GPs and multi-disciplinary teams (MDT).
- Developing additional in-borough ECH provision means more Islington residents can be cared for and supported closer to home and in their community, rather than out of borough.

5.2. In addition to benefits for individuals and communities Extra Care Housing is strategically advantageous to LBI and public sector partners:

- The empowering and independence-oriented ethos of ECH aligns better with the Council's strengths-based working agenda than traditional accommodation-based provision (i.e. care homes). This should reduce reliance on costlier formal care and support services – contributing to cost containment across the local health and care economy in a climate of increasing need and demand.
- Developing additional ECH units in-borough contributes to local commitments and targets related to increasing supply of genuinely affordable social rent housing.
- Unlike care home placements, residents of ECH can claim Housing Benefit to pay for rent and intensive housing management support. This is paid for by central government and therefore ECH placements represent better value for money for LBI investment.
- Developing additional ECH provision will create jobs in-borough, both in construction and in the care and support sector. In line with LBI commitments, these posts will be paid London Living Wage (LLW) or above, contributing to LBI's Inclusive Economy agenda.

## **6. Current Extra Care Housing provision**

6.1. There is currently one ECH Scheme in Islington, the Mildmays, which is comprised of 87 studio, one bedroom, and two bedroom units, all of which are let at social rent. There is no shared ownership or private ECH in-borough.

6.2. The Mildmays is primarily designed as a general needs older people's (age 55+) scheme, however the residents of the scheme have a range of needs. There is currently no specialist

provision in-borough, for example, for people with dementia, older people with learning disabilities, or older people with mental health needs.

- 6.3. The Mildmays is a popular option for older people currently – it is well occupied, has a consistent rate of referrals, and a waiting list (20 at the time of writing) of interested residents. Demand is more limited for the studio units, than for one bedroom flats. This suggests that there would be demand for additional appropriate high quality affordable provision.

## 7. Projected Extra Care Housing needs

### Older People:

- 7.1. More Choice, Greater Voice – a toolkit for producing a strategy for accommodation with care for older people (developed by the Housing Learning and Improvement Network (LIN), the sector body who advise on best practice) recommends 25 units of Older People’s ECH per 1,000 people aged 75 and over in the population.
- 7.2. Based on Projecting Older People Population Information (POPPI) data on the over 75’s, a broad approximation of the level of need for Older People’s ECH in Islington can be projected as follows:

Year	Population aged 75+	Total Need for ECH
2019	9,500	238
2020	9,600	240
2025	11,300	283
2030	12,700	318
2035	14,800	370

LB Islington is committed to the Fairness Agenda, including increasing the supply of genuinely affordable housing. On this basis, projections are premised on the assumption that ECH units will be let for social rent.

- 7.3. The above analysis indicates that Islington is currently undersupplied by 151 social rent Older People’s ECH units. To address this shortfall and meet future needs, Islington will need to develop an additional 283 units in-borough by 2035.
- 7.4. Analysis of older people’s needs on the Housing Register indicates that there is more demand for one bedroom units than two bedroom units. Providers and commissioners consulted with advised that, in their experience, demand for two-bedroom ECH units has been limited and, as a result, they have been hard to fill and left void, with resulting financial losses incurred by providers. In Islington, demand for studio apartments at the Mildmays has been lower than demand for one-bedroom units. Learning lessons from this, future developments should consist of mostly one-bedroom units, with a small proportion of schemes designated for two-bedroom units, and no studio units.

7.5. Soft market testing, commissioner engagement, and a review of current practice indicates that in order to stack up financially, each ECH scheme must include a minimum of 55 units. To avoid an institutional atmosphere and ensure safe delivery, individual schemes should consist of no more than 90 units. Extra Care villages may be suitable for accommodating a greater quantum of units, however, it is noted that these are often larger-scale developments, for which there are unlikely to be any opportunities evident in the borough. This therefore suggests that Islington needs an additional 3-5 schemes to meet needs, based on schemes ranging from 55-90 units. In order to meet this need, the Council is actively investigating use of its own land to develop affordable ECH schemes.

Learning Disabilities (LD):

7.6. There is currently no LD specialist ECH in-borough.

7.7. Based on POPPI data on people with LD aged 65 and over, a broad approximation of the anticipated level of need for LD specialist ECH can be projected as follows:

Year	Population aged 65+	Total Need for ECH
2019	453	11
2020	459	11
2025	526	13
2030	624	15
2035	722	18

Commissioners also anticipate that an additional 5 ECH placements will be required for people with LD aged under 65 by 2035.

As with general needs Older People’s ECH, it is assumed that LD specialist ECH units will all be delivered at social rent.

7.8. Projections of need above are based on the assumption of developing 25 units per 1,000 people with LD age 65+. This estimate is based on commissioner expertise and reflects the fact that although life expectancy in people with LD is increasing, people living with LD have a significantly lower life expectancy than the general population. The provision of ECH is therefore likely to be required by a younger cohort (age 65+) than in the general needs population.

Commissioners anticipate three main cohorts within the LD population will require and benefit from specialist ECH:

- People moving out of residential care or hospital with complex needs.
- People who need to leave the family home due to ageing family carers no longer being able to provide support.

- People who need to move out of general needs accommodation due to increasing needs.

7.9. The above analysis suggests that Islington is currently underserved by 11 units of LD specialist ECH. To address this shortfall and meet future needs, Islington will need to develop 23 units by 2035. To accommodate the needs of people with LD who require live-in carers or who want to continue living with an ageing family carer, provision of more two-bedroom units than is required for general needs older people's ECH may be required.

7.10. Owing to the needs of the client group assumptions around scheme size and viability set out for Older People's ECH do not apply for LD specialist provision, which, if developed as a standalone scheme would need to be smaller. Most ECH for people with LD could, however, be provided in the context of a larger mixed ECH scheme, assuming that the staff had the required specialisms to work with this cohort.

#### Mental Health (MH):

7.11. There are no national datasets comparable to POPPI for people with serious mental illness (SMI) and personal care needs. Baseline information and projections for this group are therefore based on local data and intelligence.

7.12. Camden and Islington Foundation Trust (CIFT) are currently undertaking strengths-based reviews of 82 Islington residents with SMI who reside in high support MH schemes and out of borough placements. Within this cohort, approximately 40% of residents are estimated to have personal care needs, due to comorbid physical health conditions. Traditionally, these residents would have been transferred to residential care homes, and some are still likely to move to nursing care settings. Of the cohort not requiring nursing care, it is expected that many could benefit from the less restrictive and more empowering (than residential care) option of specialist MH ECH provision.

7.13. Assuming the above, Islington would require circa 30 specialist MH ECH units. This may be an underestimation of need, as the current programme of service user reviews has only included a particular cohort of residents within the MH accommodation pathway to date. Commissioners will monitor this on an ongoing basis, but it is expected that demand for MH specialist ECH will increase further as there has been an historic 20-year mortality gap between those with SMI and the general population, which health and social care services are trying to close. If successful, this would mean that people with SMI will live longer but with serious physical health conditions requiring personal care, which could be provided in an ECH setting.

7.14. As with LD specialist ECH, owing to the needs of the client group, assumptions around scheme size and viability set out for Older People's do not apply for MH specialist provision, which, if developed as a standalone scheme would need to be smaller. As with Older People's and LD-specialist ECH, it is assumed that MH specialist ECH units will be delivered at social rent. Unlike Older People's ECH and LD ECH, it is likely that residents with SMI will require smaller one bedroom or studio units, in line with their needs.

#### Total projected Islington ECH needs:

7.15. Based on the above the total projected need for social rent ECH across different client groups is estimated as follows:

Year	Older People's	Learning Disabilities	Mental Health	Total
2019	238	11	30	279
2020	240	11	30+ (expected increase)	281 (+ MH)
2025	283	13	30+ (expected increase)	326 (+ MH)
2030	318	15	30+ (expected increase)	363 (+MH)
2035	370	18	30+ (expected increase)	418 (+ MH)

Islington projections and the London Plan:

7.16. The London Plan recommends that Islington should develop 60 additional units of specialist older persons housing per year – this would therefore mean the borough should develop 600 additional units over the next 10 years. The Council cannot commit to do so due to limited availability of land for development in the borough and, even if land were to become available, the costs of the required care and support to be delivered could be unviable at a time of ongoing austerity.

**8. Specialist Extra Care Housing needs**

8.1. In addition to general needs Older People's, LD, and Mental Health ECH requirements outlined above, there may be additional gaps in and need for specialist-ECH provision, including:

- Dementia
- Complex physical health needs (requiring nursing care)
- Substance Misuse

8.2. In line with client group needs, specialist Schemes are likely to be smaller than the minimum 50 units specified above and may have bespoke design and location requirements different to the considerations set out below. Some specialist provision may form part of larger mixed Schemes.

**9. Design considerations**

9.1. There is no single 'model' design for ECH – the specifics of each site, scale and size of developments, and availability of capital funding will determine the brief in each instance.

9.2. Building design should utilise the site's potential, for example, locating individual dwellings toward quieter parts of the site, making a focal point of an existing tree, providing a stimulating view of street life for residents who may spend a large proportion of their day within the scheme, etc.

9.3. The design of accommodation, selection of equipment, signage, internal colour and finishes, and landscaping should enable the independence of people who have mobility problems, people living with Dementia, people with Autism, people with LD, people who are physically frail, or people who may have a visual, hearing, or cognitive impairment, while maintaining a homely feel and without appearing or feeling clinical.

9.4. Developments should embrace the ten key design elements of the Housing our Ageing Population Panel for Innovation (HAPPI) reports 1 and 2:

- New homes should have generous internal space standards, with potential for three habitable rooms and designed to accommodate flexible layouts.
- Care is taken in the design of homes and shared spaces with the placement, size, and detail of windows to ensure plenty of natural light, and allow daylight into circulation spaces, including for those in wheelchairs.
- Building layouts maximise natural light and ventilation by avoiding long internal corridors and single aspect flats, and apartments have balconies, patios, or terraces with enough space for tables and chairs as well as plants.
- In the implementation of measures to ensure adaptability, homes are designed to be 'care ready' so that new and emerging technologies, such as tele-care and community equipment, can be readily installed.
- Building layouts promote circulation areas as shared spaces that offer connections to the wider context, encouraging interaction, supporting interdependence and avoiding an 'institutional feel', including the imaginative use of shared balcony access to front doors and thresholds, promoting natural surveillance and providing for 'defensible space'.
- In all but the smallest developments (or those very close to existing community facilities), multipurpose space is available for residents to meet, with facilities designed to support an appropriate range of activities – perhaps serving the wider neighbourhood as a community 'hub', as well as guest rooms for visiting friends and families.
- In giving thought to the public realm, design measures ensure that homes engage positively with the street, and that the natural environment is nurtured through new trees and hedges and the preservation of mature planting, and providing wildlife habitats as well as colour, shade, and shelter.
- Homes are energy-efficient and well-insulated, but also well ventilated and able to avoid overheating by, for example, passive solar design, the use of deciduous planting supplemented by external blinds or shutters, easily operated awnings over balconies, green roof, and cooling chimneys.
- Adequate storage is available outside the home together with provision for cycles and mobility aids, and that storage inside meets the needs of the occupier.

9.5. In addition, for ECH the Local Plan sets out the following design issues in Policy H7 which have to be considered and addressed:

- The proposal is for provision of self-contained units (or at least en-suite private rooms which meet or exceed minimum space standards) which addresses other requirements for private internal space;
  - There is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms;
  - Appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided;
  - Appropriate wheelchair accessibility is provided in line with policy H4;
  - Good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
  - Servicing access and a safe drop off point is within 50m of the main entrance in line with Policy H4; and
  - Provision of suitable charging points for mobility scooters is included on-site – with a minimum standard of secure scooter storage and charging facilities equivalent to 25% of dwellings.
- 9.6. Scheme designs should be co-produced with relevant stakeholder groups including local older people, people with LD, people with SMI, and their carers and families, as well as neighbouring residents, who are routinely engaged within the Planning process.
- 9.7. Buildings should have a logical layout that can easily be understood by residents, staff, and visitors.
- 9.8. Subject to suitability of the location in planning terms – the Local Plan sets the relevant policy framework for design considerations, there is no restriction on the number of storeys for ECH. In developments with more than three stories, the number of lifts (including accessible lifts) to be provided and the emergency evacuation/fire strategy needs to be agreed with LBI at the earliest opportunity. The building should not identify itself as housing for older people by its appearance.
- 9.9. Schemes should provide appropriate and flexible communal and community facilities. ECH developments may present an opportunity to enhance, consolidate, replace or rectify a deficiency in local amenities, for example, by provision of a base for clinical services. Schemes should not enter into competition with existing local amenities, for example, shops, cafes, salons, etc. Providers should think creatively about how the development can develop links between residents and existing local provision e.g. making links with local spiritual leaders to deliver in-reach for those who can't leave the scheme, partnering with the mobile library service rather than placing a library area on site, etc.
- 9.10. Schemes must provide appropriate office and changing space for care, support, and housing management staff. This should be designed in such a way that encourages collaboration as far as possible, while maintaining compliance with legislative and regulatory standards.

## **10. Location considerations**

- 10.1. Location is of considerable importance in the development of ECH scheme and can mean the difference between a scheme and its residents being part of an external community, or remaining segregated and isolated. The location of a scheme may influence the degree of community involvement, it may limit or enhance its attractiveness to staff to work in depending on accessibility, and it may discourage or encourage relatives or friends from visiting for similar reasons.
- 10.2. Sites selected for ECH should be located appropriately to the needs of the intended occupiers and should be:
- Served well by public transport – bus stops, train stations, etc.
  - Accessible – preferably a relatively flat neighbouring topography with drop kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users, and mobility scooters.
  - Close to local amenities – including libraries, health services, postal facilities (i.e. a post box or post office), banks, leisure facilities, cafes and restaurants, places of worship, and shops.
  - Well-lit, safe, and considered a safe neighbourhood.
- 10.3. Where possible, sites should overlook outdoor space to provide a stimulating view for residents who may spend a large proportion of their day inside the scheme.
- 10.4. Location-related noise pollution (e.g. due to proximity to a busy road) needs to be considered from the outset and mitigated accordingly through good acoustic design. The Local Plan has further guidance on this issue. The ability to understand a normal conversation can be reduced by high levels of background noise.
- 10.5. Consideration should be given to accommodating vehicles for visiting –medical or emergency personnel and a safe drop off point within 50m of the main entrance should be possible.
- 10.6. Current provision is based in the Mildmays ward – the rest of the borough is under-served. When asked, local residents reported that they would like to stay as close to their current homes as possible. The Finsbury Park, Hillrise, and Junction wards are home to the highest numbers of older people in the borough – it may therefore be desirable to identify sites for development in these wards, however, given the scarcity of land in Islington, opportunities throughout the borough should be considered.

## **11. Appendix one: engagement**

LBI Joint Commissioning are grateful to all of the residents, professionals, and providers who contributed to the development of this needs assessment, detailed below:



Stakeholder	Role/Team
<b>LBI/ICGG Strategy and Commissioning</b>	
Commissioning SMT	Senior Management Team
People DMT	Directorate Management Team
Marisa Rose	Assistant Director, Integrated Care
Jill Britton	Assistant Director, Joint Commissioning
Ben Gladstone	Interim Head of Adult Social Care Commissioning
Nikki Ralph	Senior Commissioning Manager, Integrated Care
Wil Lewis	Commissioning Manager, Housing with Care and Support
Josie Melrose	Commissioning Officer, Older People
Christine Weekes	Contracts Officer
Ray Murphy	Joint Commissioning Manager, Older People
Alice Clark	Joint Commissioning Manager, Mental Health
Rosie Ryan	Joint Commissioning Manager, Learning Disabilities
David Jump	Contracts Team Manager
Colm Rogan	Resources Team Manager
Tim Yellowhammer	Data and Finance Officer
<b>LBI Adult Social Care Operations</b>	
Adults SLT	Senior Leadership Team
North Team	ASC Operational Team
<b>LBI Housing</b>	
Hannah Bowman	Head of Housing Strategy, Improvement, and Partnerships
Anna Vincini	Service Improvement and Strategy Manager
Ruth Peacocke	Principal Housing Policy and Projects Officer
<b>LBI Planning</b>	
Ben Johnson	Team Leader, Planning Policy Team
Michael Carless	Deputy Team Leader, Planning Policy Team
Linda Aitken	Design and Conservation Principal Urban Designer
<b>Islington Resident Groups</b>	
Voice for Change	Older People's engagement group
Residents at Mildmays ECH	Current residents at the borough's only ECH scheme
Islington Carers Partnership Pathway Board	Carers engagement group, facilitated by Age UK
Islington BAME Carers Group	BAME carers support group
Islington Carers Group	Carers support group
<b>Providers</b>	
Linda Strong	Assistant Director, Notting Hill Genesis
Jackie Millar	Scheme Manager, Notting Hill Genesis
Iain Shaw	Assistant Director, Peabody
Sheila Goss	Senior Development Manager, Peabody
Andrew Forbes	Head of New Business, Peabody
Sarah Lanham	Director of Business Development, One Housing
Fiona Lovering	Senior Development Manager, One Housing
Christopher Holley	Chief Executive, HCHA
Sarah Porter	Executive Assistant to the CEO, HCHA
Usman Sheikh	Director, Care Support

Sian Davenport	Business Development Lead, Mears
Peter Smith	Housing 21
Alison Bearn	FLIC Programme Manager, SHP
Toni Warner	Deputy Director, SHP
<b>Commissioners</b>	
Mark Blomfield	Senior Joint Commissioning Manager, LB Hounslow
Katrina Bell	Assistant Joint Commissioning Manager, LB Hounslow
Preeti Virk	Joint Commissioning Manager, LB Richmond and Wandsworth
Laura Palfreeman	Commissioning and Transformation Lead, LB Hammersmith and Fulham
Phil Darby	Strategic Commissioner, LB Camden
Aphrodite Asimakopoulou	Commissioning Manager, LB Haringey
Sujesh Sundarraj	Commissioning Officer, LB Haringey

## 12. Appendix two: bibliography and data

What is ECH

- [The Extra Care Housing Toolkit – Care Services Improvement Partnership](#)

Policy Context

- [Housing and the Care Act – Housing LIN](#)
- [MHCLG Guidance: Housing for Older and Disabled People](#)
- [The London Plan – Policy H13 – Specialist Older Persons Housing](#)

Current ECH provision

- Mildmays waiting list – NHG

Projected ECH needs

- [More Choice, Greater Voice: a toolkit for producing a strategy for accommodation with care for older people – Housing LIN](#)
- [POPPI: Projecting Older People Population Information](#)
- [Healthy Ageing: Working Together to Improve Wellbeing in Later Life – Camden and Islington Annual Public Health Report 2018](#)
- Islington Mental Health Accommodation Review – 2019

Design and Location Considerations

- [The design and build of successful extra care housing – Housing LIN](#)
- [Kent County Council Extra Care Design Principles](#)
- [Older People’s Housing Design Guidance – Royal Borough of Kensington and Chelsea](#)

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