## **Assael Architecture comments**

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## Assael Architecture Response to Policy H15 Specialist older persons housing

We believe that Policy H15 in the new London Plan is a missed opportunity to encourage the growth of a large mid-market downsizer housing sector in London.

The benefits of a substantial downsizer sector should not be underestimated. It would set off a 'property chain reaction' freeing up homes that are currently under-occupied by older people, making these available for young families and therefore helping to correct a dysfunctional property market. The best way to achieve this is through purpose-designed aspirational retirement accommodation which encourages those in larger homes to relocate to suit their changing lifestyle.

In our view, the definition of C2 is too narrow. We disagree with the proposal that age restricted 'sheltered accommodation' and 'extra care accommodation' should be defined as Use Class C3. All Londoners would benefit from a time-limited classification of Use Class C2 for all types of housing for older people. This would incentivise a substantial ramp up in delivery with follow-on benefits for the wider property market.

We believe the case for numbers set out in Section 4.15.1 and Table 4.4 is unrealistic. Extrapolating from AgeUK data, we are projecting an increase of an additional 370,000 people over 65yrs in London through to 2029, and therefore the total requirement of 50,000 homes over this period is inadequate.

Finally, we propose that there should be a much stronger commitment to harnessing 'Intergenerational Opportunity', either through promoting the co-location of housing for different ages, or through re-locating housing for older people into our urban centres, driving renewal and revitalising high street life.