

CH2(c) (Chapter 35, CLP) encourages extra care housing in C2 use. This benign use could complement other uses on the site.

3.20.1 Subject to meeting the requirements of Policy CK1, a modest amount of enabling residential development may be acceptable on the site where this provides a greater benefit to social and community provision in the borough. Residential use on part of the site would be appropriate in the respect, including affordable housing unless it could be demonstrated that this was not possible for viability reasons.

Policy CK1 in the Local Plan is supported by the London Plan and the NPPF: London Plan (2016):

The current London Plan (2016) has three policies that are relevant to the loss of local social and community uses:

- Policy 3.1 Ensuring equal life chances for all:
B: Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.
- Policy 3.16: Protection and enhancement of social infrastructure:
B: Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted.
- Policy 3.18: Education facilities:
C: Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand.

NPPF:

The NPPF (2018) seeks to promote healthy communities (paras 92/93) seeks “to guard the unnecessary loss of valued facilities”.

5. The scale of development:

The proposed raft over the Circle and District Lines would greatly increase the area of the site resulting in a development three times the size of the existing buildings. This has greatly increased the impact of the proposal, especially in terms of the scale of construction and the length of the project – it is projected to take nearly 5 years.

The developer seeks to claim benefits from rafting over the railway. We agree with the Council that what benefits there may be accrue almost entirely to the developer – a larger site/development with residents of the scheme being the main beneficiaries.

VRARA's main concerns relate to the impact of raft on:

- the delivery of construction materials, especially the steels, to be used to bridge over the railway line;
- the length of the construction period; and
- the resulting scale of the development.

We are concerned that neither the CTMP nor the CMS indicate the scale of this operation, the means by which these materials would be transported into the site and how the raft would be constructed.

6. Housing mix:

The Local Plan (2015/2018) has a strategic objective (CO6) to have “a diversity of housing, that at the local level, will cater for a variety of housing needs, and is built for adaptability and to a high quality.” This is interpreted as meaning “a better mix of housing types and tenures.

This scheme is a large housing scheme (150 units) almost entirely (142 units) being top-of-the-range, luxury retirement housing aimed at a single demographic – “ultra- high net worth” individuals. This would be catering exclusively to this niche market, with no affordable housing to diversify the mix. This would be an exclusive luxury retirement housing ghetto.

As a housing scheme this development should be providing on-site affordable housing, but, due to claims that is the equivalent of a care home, this scheme contains no affordable housing triggered by the scale of market housing that would be provided. This large, mono-tenure luxury retirement housing scheme provides no diversity of housing and would make little contribution to meeting the borough's housing needs, whilst losing 109 units of student housing.